



**GROUP AGAINST SMOG & POLLUTION**

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January 28, 2011

VIA FEDEX

Lisa P. Jackson, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building, Mail Code 1101A  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Petition for Objection to Orion Power Midwest, L.P. Permit # 0054, for Operation of the Cheswick Power Station, an Electric Generating Unit Located in Springdale, Allegheny County, Pennsylvania**

Dear Administrator Jackson:

I have enclosed a Petition requesting that the Administrator of the Environmental Protection Agency ("EPA") object to the Title V Operating Permit No. 0054 (the "TVOP") issued to Orion Power Midwest, L.P. ("Orion") for the operation of the Cheswick Power Station (the "Plant"), an electric generating unit in Springdale, Allegheny County, Pennsylvania. The Petition is timely submitted by Citizens for Pennsylvania's Future ("PennFuture") and the Group Against Smog and Pollution ("GASP") (collectively, "Petitioners") pursuant to section 505(b)(2) of the Clean Air Act, 42 U.S.C. § 7661d(b)(2), and 40 C.F.R. § 70.8(d). Petitioners are filing the Petition with the EPA Administrator, and serving copies on the Allegheny County Health Department, GenOn Power Midwest, L.P. (as successor-in-interest to Orion Power Midwest, L.P.), and EPA's Region III Air Permit Section Chief.

I have also enclosed a CD-R that contains the exhibits to the Petition, which are voluminous.

As fully explained in the Petition, Petitioners respectfully request that the Administrator must object to the issuance of the TVOP, for the following reasons:

- The TVOP does not include applicable requirements, including restrictions requiring the operation of a flue gas desulfurization system and compliance assurance monitoring for that system and the Plant's electrostatic precipitator;

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- The TVOP does not impose limitations on emissions of mercury, as required by ACHD's rules and regulations;
- The TVOP does not, but should, apply to the Ash Disposal Site associated with the Plant; and
- The TVOP does not impose testing requirements and other conditions needed to ensure that the Plant's ash handling, storage, and processing operations comply with the TVOP's emissions limitations and other operating restrictions.

Thank you for your consideration of the Petition.

Very truly yours,

John K. Baillie, Senior Attorney  
Charles McPhedran, Senior Attorney  
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/s/

Joe Osborne, Legal Director  
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Cc (w/encl): Sean M. Garvin, Regional Administrator  
U.S. Environmental Protection Agency  
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Diana Esher, Director  
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