

From: Ellis, H. Gene
Sent: Monday, February 18, 2008 8:27 AM
To: Shirley Williamson
Cc: Wendy Bley (E-mail) Ellis, H. Gene
Subject: FW: FW: Requirements For Narrows Generating Units 2 & 4
Attach: Fwd_ FW_ Requirements For Narrows Generating Units 2 & 4.msg

Shirley, I don't know if you have the time to read this before our call this morning. If so, we can discuss it then. If not, what is your availability this afternoon?

From: BLEYLVA
Sent: Friday, February 15, 2008 5:06 PM
To: Ellis, H. Gene
Subject: Fwd: FW: Requirements For Narrows Generating Units 2 & 4

I just pulled out and studied the RSA language again. Technically, the RSA doesn't actually say that the aeration must be "on" whenever the unit is operating. And since Unit 4 was completed before the RSA, technically it doesn't say anything specific about the operation of Unit 4. Sooooo, technically, I think operating Unit 4 below 40% gate without aeration on is OK from a strict compliance perspective. However, I'm certain that NCDWO would have a problem with it if they knew. And despite the final wording of the RSA, we know that the intent was that aeration would be "on" whenever the units were operating. Will DWO ever notice? Possibly. It may be that the result of not having aeration on during these low gate periods will show up in the DO monitoring data (ie, the DOs may drop when flows through project are very low). On the other hand, as I recall, Shirley/PB investigated this low flow business before, and determined that there is a lot of "natural" aspiration through Unit 4 when it is run at a very low gate setting, which resulted in some increase in DO. Will it be enough to "hide" the fact that the aeration valves are not on? who knows.

I guess we'll need to discuss and ponder this some more. I'll do nothing more until you let me know what (if anything) you want to do right now. -W

Wendy Bley
Long View Associates

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