

Exhibit G

Mirant Canal, LLC
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October 29, 2003

Ms Sharon Zaya
Massachusetts Office of Ecosystem Protection
U.S. EPA Region I
One Congress Street (CMA)
Boston, MA 02114-2023

Delivery: FedEx



Subject: Canal Station NPDES Permit No. MA004928
Response to Request for Information

Dear Ms. Zaya:

As requested by EPA in the letter dated April 30, 2003, attached please find the information submitted pursuant to the Section 308 of the Clean Water Act for Mirant Canal L.L.C (Mirant Canal) [NPDES Permit No: MA0004928].

The information is being provided in the form of the following attachments to this letter:

Attachment A- Comprises the NPDES permit renewal application Form 1 (Attachment A.1) and Form 2C (Attachment A.2).

Note that in our final review of the Form 2C analytical results, it was discovered that a grab sample was taken at Outfalls 001 and 002 instead of a composite samples. We have notified our contracted analytical lab and have made arrangements for applicable composite samples to be collected. These results along with an updated Form 2C will be forwarded to EPA as soon as possible. Please be advised that Attachment A-3 contains the analytical results for permitted outfalls 001, 002, 010, 011 and 012. It should be noted that outfalls 010, 011 and 012 are internal monitoring points that are neutralized before ultimately discharging through outfall 001. We therefore believe these outfalls do not need to be included in the updated NPDES permit.

For this submittal, Mirant Canal has conducted the representative storm water sampling, but is awaiting the sample results. Therefore, Form 2F will follow after we receive the sampling analytical results from the lab. In regard to us submitting a Form 2F, per a conversation with EPA Region 1 (Ann Wearmouth phone conversation with Sharon Zaya, August 12, 2003) it is our understanding that EPA's request to submit Form 2F is to provide data, but the EPA does not intend to include stormwater monitoring in the Station's NPDES renewal permit. We request that the Canal Station be allowed to continue to operate under the current Multisector General Permit (MSGP) MAR05B927, as it is renewed from time to time.

Attachment B - Comprises the Canal Station's data and information to support granting a request for continuation of the Canal Station 316(a) Thermal Variance.

The Canal Station employs a diffuser system to ensure rapid mixing of the thermal discharge. Massachusetts has a maximum temperature criteria of 85 degrees F. The Canal Station's 316(a) thermal variance allows a maximum thermal discharge of 86 degrees F (i.e. 1 degree F above the State maximum criterion). Analysis of temperature data and associated hydrodynamics demonstrate that the Station does not exceed the 86 degree F variance. The interagency Technical Advisory Committee used in-situ bioassay studies conducted by the Massachusetts Division of Marine Fisheries as the basis to conclude that pelagic fish inhabiting the Cape Cod Canal would not be stressed in the plant discharge unless temperatures exceeded 90 degrees F. Thus the 86 degree F variance does provide a margin of safety.

Also, Mirant Canal's thermal discharge ranges between 1 to 3 degrees F above ambient and therefore at times exceeds the Massachusetts' criteria not to exceed 1.5 degrees F. However, much larger naturally occurring temperature fluctuations of up to 17 degrees F occur in the Cape Cod Canal as a result of tidal transport of water between the relatively warm Buzzard's Bay at the southern end of the canal and the relatively cool Cape Cod Bay at the northern end of the Canal. These naturally occurring temperature fluctuations dwarf the relatively small 3 degree F increase over ambient both in terms of magnitude and duration. This circumstance combined with compliance with the 86 degree F criteria make Canal Station's increase above ambient insignificant from a biological impact perspective ensuring the continuation of a "balanced indigenous population".

Attachment C - Comprises Canal Station's information responsive to EPA's request for information to address Section 316(b) of the Clean Water Act. This information consists of:

C.1 - A narrative report summarizing impingement and entrainment data collected at Mirant Canal, including a quantification of estimated mortalities due to impingement by species and adult equivalents, abundance and distribution of affected species with emphasis on representative important species (RIS), appropriate quantitative modeling to place the impact of plant losses in perspective with estimates for both extensively studied and secondary species, conditional mortality rates due to plant operations in the absence of other mortality sources and equivalent adult losses via entrainment of larval and other early life stages.

C.2 - A report presenting a detailed description of the cooling water intake structure with an analysis of the costs, feasibility and effectiveness of various alternative intake technologies and screening devices to reduce impingement and entrainment at the Station.

C.3 - The information table/matrix and associated back-up information EPA requested by reference to the April 21, 2000 to Mr. Norm Cowden for overall 316(a) and (b) decision making.

C.4 - 316 (a) and (b) References.

Mirant believes that based on the relative high cost of alternative intake technologies in comparison to the small benefits, the existing cooling water intake structure should be considered Best Technology Available.

Attachment D

Contains the information EPA requested on the facility's chlorination system relative to the June, 1999 impingement incident, including:

D.1 – Response to EPA's request to explore chlorine alternatives.

D.2 – Final Report on Evaluations of Mexel 432 Antifoulant Treatment

Attachment E

This attachment includes three components of the supplemental information EPA requested as follows:

E.1 – A description of existing conditions at the plant including narratives of process and equipment operations.

E.2 - Volumetric flow rates and flow schematics of all water sources and waste streams.

E.3 – A chemical inventory

Please note the detailed description of the cooling water intake structure is included in Attachment C.2.

Should you have questions regarding the above information please feel free to contact me at (781) 982-9370 extension 102.

Sincerely,



Shawn Konary
Director, Environmental Affairs

Attachment

Cc: P. Koopman
File 1.2.1.2