

Re: Case 00-F-1522- Application of Astoria Generating Company, L.P. for a Certificate of Environmental Compatibility and Public need to Construct and Operate a 1,816 megawatt Natural Gas-Fired Combustion Combined Cycle Turbine Electric Generating Plant in the City of New York, Queens County, New York

Dear Secretary Deixler:

Albany, New York 12223-1350

Attached please find 11 copies of Exhibit 15.7.5-1, Marley Cooling Tower Manufacturers Guarantee that the cooling tower drift rate will not exceed 0.0002%. Please insert this exhibit behind the existing exhibits in Volume 2 of the Article X Application filed on October 26, 2001.

Sincerely,

ENVIRONMENTAL SCIENCE SERVICES, INC.

Matthew Dowling **Environmental Scientist**

Attachments: Exhibit 15.7.5-1

C: Janine Whitken, Orion Power Robert Svendsen, Orion Power Liam Baker, Orion Power George Claypoole, Orion Power Scott Truner, Nixon Peabody Attached Distribution List

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EXHIBIT 15.7.5-1 Manufacturers Guarantee

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-> Environmental Science Services ; Page 4 3/30/01 10:00; Received:

MAR 30 2001 10:02 FR PB POWER INC

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P.04/09



Marley Cooling Tower A United Dominion Company

108 Corporate Park Drive White Plains, New York 10804 Tel 914-697-5030 Fax 914-697-5039

911 EV.7 4440

March 20, 2001

PB Power, Inc. One Penn Plaza New York, NY 10119

Dugald Morrison Attn:

Subject:

Orion Power New York Astoria Re-Powering Project Cooling Tower Drift Rate

Gentlemen:

We are pleased to confirm that Marley Cooling Tower is able to furnish a cooling tower for the Astoria re-powering project with a drift rate not to exceed 0.0002%. This drift rate is expressed as a percentage of the total circulating flow rate through the cooling tower.

The stated drift rate is a guaranteed value and not an estimate. Verification of the guarantee would be achieved by measuring the drift rate after start up in accordance with the Cooling Tower Institute Test ProcedureATC-140.

This drift rate will be achieved by installing two layers of our Xcel Plus Drift Eliminators in this cooling tower. The best available drift rate for a single layer of this eliminator is 0.0005%. For applications requiring a lower drift rate, we add a second layer of the Xcel Plus Drift Eliminator.

The Xcel Plus Drift Eliminator is a cellular type eliminator, which is the most efficient eliminator available in the cooling tower industry today. Each layer is a three pass design, which means that the air makes two directional changes within each pack. Each time the air makes a directional change the heavier water droplets are stripped out of the exit air stream and drained back into the cooling tower. With a double layer of eliminators the air will be forced through six separate passes before exiting the cooling tower.

You will find attached a catalog cut sheet, which describes the Xcel Plus Drift Eliminator in more detail. In addition, I have included a schematic drawing from a similar project showing the location of the drift eliminators within the cooling tower structure.

The Marley Xcel Drift Eliminator has been in use for more than fifteen years so we offering a proven product for this application and not a prototype. Marley has a four acre testing facility in Kansas City, Missouri where all of our product testing is performed. In addition the drift elimination performance for the Xcel Plus Eliminator has been independently verified through third party testing.

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Page 5

P.05/09

Please let me know if I can furnish any of the information on this subject.

Very Truly Yours,

E'F

Jim Van Garsse General Manager, Eastern Region The Marley Cooling Tower Company

cc: Darren Baugher Marley Cooling Tower Headquarters Overland Park, KS

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Mariey developed the first cellular drift eliminator 20 years ago when eliminator designs were primarily blade type configurations and not very effective. Next, Marley patented the XCEL generation of eliminators in the early 80s. No other eliminator could come close to XCEL eliminator's low drift rate and low pressure drop. Now, virtually every eliminator is a nesting cellular PVC type design.

Introducing XCELplus, a more advanced design that meets or exceeds today's demanding specifications for drift emissions, without sacrificing fan horsepower. Now you can have drift rates half of the original XCEL with equivalent pressure drop. The eliminator discharge angle is important enough to warrant two separate eliminator designs for crossflow and counterflow towers. Tests show the air direction leaving the eliminator is extremely important imperfect designs create additional work for the fan. This means either increased fan horsepower—or reduced cooling tower performance. The crossflow version features dreinage slots within the eliminator pack to insure trapped drift is returned to the wet side of the cooling tower.

Low drift rate is the primary goal of eliminator design. XCEL*plus* boasts typical drift rates of .001% of the total GPM. Drift rates of .0005% and lower are available depending upon tower configuration. Drift rates with the original XCEL eliminator were so low that a better measurement method than the Sensitive Paper technique was required. The Hot Bead Isokinetic Drift Measurement (HBIK) method pioneered by Marley 20 years ago is now the endorsed CTI standard test procedure, ATC-140, for drift measurement today.

Considering low drift rates and low pressure drop, XCELplus is the most effective cooling tower drift eliminator available in the market place today.









Suggested Specification:

Drift eliminators shall be of cellular type, Marley XCEL plus or approved equal. The eliminators shall be thermoformed from 17 mil (.017) PVC (polyvinyl chloride) material into a configuration providing at least three changes of air direction and solvent welded into multiple sheet packs.

Eliminators used in crossflow towers must provide a discharge angle" (as defined by the angle of the last section of the eliminator itself) of at least 42° from the horizontal when installed. The mass drift quantity, determined by the CTI Drift Test Code ATC-140 shall not exceed _____% of the total GPM and shall be guaranteed for all operating conditions.

The eliminator packs shall be able to span 66" unsupported for counterflow configurations and 72" for crossflow, with minimal deflection at design conditions. Eliminators shall be FM approved.

Eliminator packs shall measure up to 24" wide, 5.75" in depth and up to 12'-0" long.



Marley Cooling Tower A United Dominion Company

The Mariey Cooling Tower Company 7401 W 129 Street • Overland Park, KS 66213 • 913.664.7400 email: info@marieyct.com • www.marleyct.com In the Interest of technological progress, all products are subject to design and/or material change without notice.



