



ANC 6B
Capitol Hill / Southeast

February 15, 2013

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Executive Director
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OFFICERS

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Secretary
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Nichole Opkins

RE: Architect of the Capitol Application for Capitol Power Plant Proposed Air Quality Permits for Plantwide Applicability Limits for NOx and PM2.5, Installation of a Cogeneration Facility, and Operation of Existing Boiler #3

Mr. Ours:

At its regularly scheduled, properly noticed meeting on February 12, 2013, with a quorum present, Advisory Neighborhood Commission (ANC) 6B, approved by a vote of 8-0 these comments, which are submitted as the official position of ANC 6B.

COMMISSIONERS

SMD 1 *David Garrison*
SMD 2 *Ivan Frishberg*
SMD 3 *Philip Peisch*
SMD 4 *Kirsten Oldenburg*
SMD 5 *Brian Pate*
SMD 6 *Nichole Opkins*
SMD 7 *Sara Loveland*
SMD 8 *Chander Jayaraman*
SMD 9 *Brian Flahaven*
SMD 10 *Francis Campbell*

Since the Capitol Power Plant operates within the boundaries of ANC 6B, our official comments to the District of Columbia Department of Energy (DDOE) fall under the “great weight” provisions of DC law. This case is of particular interest to our commission as the plant operates within 200 feet of residential areas and 650 feet of a neighborhood school, Capitol Hill Day. As such, the Capitol Power Plant, though operated by the federal government, has a direct economic and health impact on our constituents.

The Commission is supportive of many of the benefits that would result from the changes assumed under the application. The switch from primarily coal-fired boilers to more efficient co-generation units will reduce emissions. The addition of electricity generation from those units will reduce dependence on regionally produced energy, 41 percent of which is currently generated from coal fired plants that contribute to regional air quality problems.

Cogeneration based on natural gas in the new boilers will reduce particulate matter that has the most immediate impact on the community as well as reduce other emissions that contribute to global warming and ground level ozone pollution.

The Architect of the Capitol has made significant improvements in the plant’s energy efficiency and is aggressive about the purchase of renewable energy credits

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ANC 6B Letter to Stephen S. Ours, DDOE

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and renewable sources for purchasing its electricity supply (a total of 19% renewal energy credit or purchase). These investments reduce region wide emissions and are admirable. However, the AOC has been unsuccessful in establishing local renewable resources through their facilities, which increases the burden on the Capitol Power Plant and raises the import of the questions we have about the pollution limits in the application.

Establishing new plant wide limits is a new safety standard that does not currently exist for the plant. We note however that the proposed new limits have been set at a level benchmarked to peak years of energy production from coal, and as such set an upper limit for emissions from the plant that we believe may be unnecessarily high and has not been demonstrated to factor in the immediate health impacts on the local community. Consideration of the health impacts in the immediate neighborhood is particularly important given the proximity of other sources of air pollution from the CSX rail line and the abutting highway.

Specifically, the applicant has applied to use the years 2007 and 2008 as the benchmark for the emissions rather than the two most recent years, which is the typical standard for setting new emission levels.

We ask that DDOE make a full technical evaluation of these proposed limits and benchmark years being chosen by the applicant and whether this is justified by the operation of the new cogeneration boilers. We also ask that DDOE ensure that the health impacts of the higher limits have been adequately studied and that any permit will not create a public health risk for the immediate neighborhood.

In light of the higher emission levels applied for, we have concerns about the applicant's ongoing use of coal as a power generation source outside of a national security situation. In public statements, the AOC has stated its intention to be 100% coal-free for its generation, even with considerations of peak load from extreme weather. Yet the application maintains the presence of the existing coal fired generators and has set a plant wide limit based on years that had peak levels of coal-based production.

We urge the DDOE to address the concerns raised in this letter in any permit issued by the agency. Please contact ANC 6B's Executive Director Susan Eads Role if you have questions or need further information. Thank you.

Sincerely,



Brian Flahaven
Chair