

DEC 26 2012



Capitol Hill Day School

Stephen S. Ours, Chief, Permitting Branch, Air Quality Division
District Department of the Environment
1200 First Street NE, 5th Floor
Washington DC 20002
Stephen.ours@dc.gov

RE: Capitol Power Plant Proposed Air Quality Permits for Plant-wide Applicability Limits for NO_x and PM_{2.5},
Installation of a Cogeneration Facility, and Operation of Existing Boiler #3

Dear Mr. Ours,

I am writing on behalf of Capitol Hill Day School, a PreK-8th Grade school located several blocks from the Capitol Power Plant. I am the Head of School and have worked at the School for 15 years.

It has come to our attention that the Architect of the Capitol (“AOC”), as owner and operator of the Capitol Power Plant (“CPP”), is seeking air quality permits pertaining to the plant-wide limits for various emissions at the plant. While the AOC states that it primarily uses natural gas as a fuel source, it nonetheless maintains three fuel sources, including coal, allegedly to provide emergency or back up fuel sources. In addition, AOC is seeking a permit for a new cogeneration facility which it claims will be more efficient, reduce coal usage at the CPP, and trigger overall lower emissions limits on the CPP.

The students at Capitol Hill Day School are in close proximity to the CPP, in the classroom, when using nearby parks and playing fields, and when exploring the Capitol area on daily field trips. In all kinds of weather, students are outdoors multiple times a day for recess, breaks, Physical Education, and After School programs. Summer Camp students also spend considerable time outside in June, July, and August.

It is well documented that coal-based plant emissions are significant contributors to asthma, chronic bronchitis, and other health problems, not to mention the environmentally detrimental consequences of greenhouse gas emissions generally. The American Lung Association already rates the air in the District of Columbia at below passing rates (see <http://www.stateoftheair.org/2012/states/district-of-columbia/district-of-columbia-11001.html>).

CHDS strongly urges DDOE to require the AOC to reduce and phase out the use of coal as a fuel source at the CPP. The permits under consideration do not seem to accomplish that goal. In addition, CHDS asks that DDOE limit CPP emission limits for oxides of nitrogen (NO_x) and fine particulate matter (PM_{2.5}) to the lowest level possible under applicable law and regulation. The health of our children and the community demands no less than DDOE’s vigilant protection and oversight.

Sincerely,

R. Jason Gray
Head of School