

From: Hal Wackman <halwackman@gmail.com>  
Sent: Thursday, February 14, 2013 5:06 PM  
To: Airpermits, AOC (DDOE)  
Cc: ATD EOM3  
Subject: Capitol Power Plant Proposed Air Quality Permits

Dear Mr. Ours:

I am writing to you to comment on the above mentioned permits. I am a resident of Capitol Hill, where my wife and I have lived since 1974. All my children and grandchildren also live in the neighborhood.

Firstly, I want to thank you for extending the public comment period on these permits, and also for being so helpful at the recent community meeting chaired by Councilman Tommy Wells on this matter.

You are receiving many comments on this project, so I will not repeat the background information that is well known to you. By way of my own background, I worked for many years as a staff member and manager with the World Bank on international energy projects. I have carefully reviewed the permit applications and accompanying supporting documents from the Architect of the Capitol (AOC). My main concerns and proposals regarding the proposed addition of power generating capacity and emission limits at the CPP are as follows:

1. Adding electricity generation capacity at the CPP seems hard to justify. The proposed units are small, and despite the use of cogeneration technology, I wonder if the unit costs of generation can compete with the costs of importing from the grid, which is based on large scale generating units. This should be questioned by your department, as the planned power generating capacity additions are the reason for seeking higher SO<sub>x</sub>, NO<sub>x</sub> and particulate emission limits.

2. The emission limits proposed for the total plant are based on a 2007-9 base line when higher levels of coal firing were being used, but when weather conditions are contended to be more typical than more recent years. This may be allowed by the current regulations but does not seem justified. The objective is to reduce or eliminate the usage of coal. The technology to be adopted is supposedly modern, but it is not clear that it is the best available. I wonder why the emission limits to be set under the new permits are not based on estimates of projected emissions from the plant rather than referring to past levels. If adequate gas-fired plant capacity for heating, cooling and electricity generation is installed to meet peak demand and allow for equipment outages, then why should there be any future dependence on coal? I contend that the argument made to support the emission limits in the application are not sound, and that the application should be rejected and/or the permitted limits revised to lower and more reasonable levels. Adequate natural gas fired plant capacity and the emission limits established should eliminate the need for the future use of coal.

3. Mention is made of monitoring emissions from the plant. Provision should also be made as part of the project for monitoring ambient conditions in the vicinity of the plant, and the relevant information should be made publicly available. The cost of such monitoring should be included in the project.

4. Suitable emission controls should be part of the project. This is especially critical given the health risk to tens of thousands of nearby residents, and given that the stack height at the plant is rather low.

5. The President of the country has just announced his intention to tackle climate change. The Mayor of the City is launching an environmental initiative for DC. The AOC promised to Capitol in his letter of 2009 to then Speaker of the House of Representatives Nancy Pelosi. Surely the plan of the nation's Congress to continue to operate the largest point polluter and carbon producer in the District flies in the face of these initiatives. I believe it is incumbent upon your office and these leaders to develop a long term plan for meeting the energy needs of the Congressional Complex with the greenest technology available. This

would include geothermal heating and cooling, solar and wind energy, and drastic energy efficiency improvements. I suspect that it would be feasible to virtually eliminate green house gasses and other polluting emissions, and eventually close the plant. What political leadership that would be! I propose that a careful long term study of these options be carried out, and that your office should seek agreement on that as part of the permitting process. For your information, the recently renovated nearby Hill Center at 9th St. And Pennsylvania Ave. SE is entirely heated and cooled with a very successful geothermal system, and uses no fossil fuels.

Finally, these are complicated technological and political matters. In view of the legitimate concerns of the community about this harmful plant and its proposed expansion, I strongly request that you and City leaders seek a dialogue with the AOC, the City, and a few members of the community to discuss the issues and options, and find a way forward satisfactory to all.

Sincerely yours

Hal Wackman  
306 5th St. SE  
Washington DC 20003

Tel. 202-547-2525

Sent from my iPad