

From: rauch.net@gmail.com on behalf of Jesse Rauch <jesse@rauch.net>
Sent: Tuesday, January 29, 2013 12:49 PM
To: Airpermits, AOC (DDOE)
Cc: Ours, Stephen (DDOE)
Subject: Capitol Power Plant Proposed Air Quality Permits

With regards to the Capitol Power Plant, Plant-wide Applicability Limits (PALs) Permit. The limits for things like NOx and PM2.5 seem to be _significantly_ higher than similar facilities like the GSA heating plant, and based on useful energy output, much higher than local Pepco facilities. By using their bad past pollution as the baseline for future pollution, to allow themselves to purchase the smallest possible co-generation equipment possible.

You should take into consideration where their level should be based on the size of the facility, and where they would be with an appropriately sized new co-generation equipment when setting future PAL limits.

With the correct sizing of the new equipment they should be able to meet the majority of their power requirements with minimal pollutants and only need the use of boiler units 1-3 during a co-generation system outage or when both gas and fuel oil are completely unavailable. The PAL limits on a rolling 12 month window would give them this flexibility, but only if the limits are set low enough to force the behavior. With the current high PAL limits and the minimally sized co-generation facility they will continue to produce far more pollutants than other facilities. Please revise the PAL limits to be based on a co-generation capacity combined with boiler 4-7 operations to meet anticipated loads, Please revise the boiler 3 permit to be only used to meet unforeseen peak low temperatures, and set PAL limits low enough that boiler units 1 and 2 could only be used in the most dire emergencies where exceeding PAL limits would be justified.
thank you,

Jesse Rauch
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