

From: Suellen Lazarus <suellen@lambertlazarus.com>  
Sent: Saturday, February 09, 2013 3:10 PM  
To: Ours, Stephen (DDOE)  
Cc: ATD EOM3  
Subject: Comment: Capitol Power Plant Proposed Air Quality Permits

COMMENT TO  
DISTRICT DEPARTMENT OF THE ENVIRONMENT  
RE: CAPITOL POWER PLANT  
PROPOSED AIR QUALITY PERMITS

Mr. Stephen S. Ours  
Chief, Permitting Branch  
District Department of the Environment  
1200 First Street NE, 5th Floor  
Washington DC 20002

Sent via email to: Stephen.Ours@dc.gov

Subject: Capitol Power Plant Proposed Air Quality Permits

Dear Mr. Ours:

I am writing to comment on the proposed air quality permits for the Capitol Power Plant now being considered by your Department. Thank you for extending the applicable comment period.

I urge you to reject the permits in the form proposed by the Architect of the Capitol in order to protect the public health of all DC residents including the more than 230,000 citizens who live within three miles of this plant. The operations that would be allowed by these permits are detrimental to the public health and inconsistent with the requirements of the law. For the past 30 years, I have lived within three blocks of this power plant and watched as it spilled pollutants on my children's school (Capitol Hill Day School) which is one block away, on the playground at Garfield Park, and on my house and gardens, first at 510 Third Street, SE and now at 415 G Street, SE. I have worried about the health of my children as we wiped black soot from the windowsills. In the past two years, I was diagnosed with breast cancer and cannot help but wonder if the cause has something to do with the pollutants coming from the power plant. I was hopeful when the power plant was rebuilt that the use of coal would stop. Instead, they wish to make it higher than ever.

As the materials provided by DDOE and the Architect clearly state, these proposals would allow the plant to emit significantly more than twice the amount of pollution in the form of NOx and particulate matter than was generated in 2011. (DDOE Chapter 2 Technical Memorandum, November 15, 2012, p. 4; Architect of the Capitol, "Capitol Power Plant Cogeneration Project" fact sheet at p. 2). This dramatic increase in emissions would clearly be harmful to the public health.

These emissions limits are not consistent with the legal requirements for new construction like this. The calculations use an unreasonably high emissions baseline of February 2007 through January 2009, a time when the plant used over 50% coal and when the emissions were much higher than they are today.

Emissions have been lower in recent years because the Architect has started to reduce unnecessary use of coal in this plant, as it promised Congress it would do. There should and could be continuing progress until coal is never used in this plant and emissions are further reduced from what they are today.

However, instead of requiring the Architect to achieve this result, these permits would make things even worse than the dirty old days of 2007. They would reverse the progress that has been made, and allow a future that is much dirtier than the pollution we have had in the past.

I am surprised and disappointed that the Architect would even ask for permission to do this. Surely the District government will not give them permission to put the health of DC residents further at risk, particularly when it is not consistent with the law.

In addition, the Architect has never been forthcoming with the community about its emissions or its plans for expansion. The District government has no emissions monitoring equipment located at the plant. The Architect can do better, and it is your job to enforce the law and require them to do so. Please consider these facts and legal issues and either deny these permits or make them conditional on better emission limits, monitoring, and information flow to the community.

Sincerely, Suellen Lazarus  
415 G Street, SE  
Washington, DC 20003

Cc: Mayor Vincent Gray  
1350 Pennsylvania Avenue NW, Suite 316  
Washington, DC 20004  
via email: Eom@dc.gov