

From: jane101@comcast.net
Sent: Wednesday, February 06, 2013 11:58 AM
To: Ours, Stephen (DDOE)
Cc: ATD EOM3
Subject: Comments on Capitol Power Plant
Attachments: 'Emphatic' Cap Power Plant sample DDOE + Mayor.doc

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
Via email to: Stephen.Ours@dc.gov
February 7, 2013

Re: Capitol Power Plant Proposed Air Quality Permits

Dear Mr. Ours:

The President of the country has announced his intention to act on climate change and the Mayor is promoting a Green agenda for DC. Why, then, is the Architect of the Capitol, who runs the Power Plant, wanting to expand dangerous emissions in our backyard by introducing yet a new use (electricity generation) in addition to the current heating/cooling use that still burns coal?

It makes no sense. Let them meet their heating and cooling needs by burning natural gas only (and develop plans to supply their long term energy needs without creating emissions of soot, noxious gases, and climate changing carbon).

Your office, the Mayor and the City Council should be doing everything in your power to block this absurd proposal. Set a progressive example for the community and the country, rather than facilitating a local, national and international embarrassment.

I urge you to reject the permits in the form proposed by the Architect of the Capitol to protect the public health of all DC residents including the more than 230,000 of us citizens who live within three miles of this plant.

Most outrageous is that the new proposal 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 even more harmful to our public health.

Plus! These proposed new emissions limits are not consistent with the legal requirements for new construction like this. Their calculations cleverly attempt to use an unreasonably high emissions baseline of 2007- 2008, a time when the plant used 56% coal (vs 5% in 2011), instead of the standard formula that is supposed to use the last two years as the baseline for new permits (2010-2011). If granted the permits, here's what would be the results:

Avg. 2007+2008

2011

Proposed New Levels

NOx	171 tons/year (average)	90.36 tons/year (actual)	196.7 tons/year
PM 2.5	25.4 tons/year (average)	19.09 tons/year (actual)	35.4 tons/year

In 2009, the Architect promised Congress to coal in this archaic plant dating back to 1910. It started that process, but coal was not been eliminated and will now be increased!

The new permits would make things even worse! They would allow a future that is much dirtier than the pollution we have had in the past.

We are outraged 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 even consistent with the law.

It is your job to enforce the law and to require the Architect to follow suit. We don't need this emissions-belching plant, whether it's for the present heating/cooling needs, or, now, for a brand new use, electricity, in the middle of an area where six elementary schools are located and where we live. We're the ONLY facility in DC that is burning coal. We are living in 2013 - and NOT in 1910 Industrial America. Shame!

Signed,

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