

**Testimony Before the Air Quality Division of the District Department of the Environment  
Regarding Capitol Power Plant Proposed Air Quality Permits for Plantwide Applicability  
Limits for NOx and PM2.5, Installation of a Cogeneration Facility, and Operation of  
Existing Boiler #3**

To: Stephen S. Ours, P.E., Chief, Permitting and Enforcement  
Air Quality Division, District Department of the Environment

From: Nicole W. Sitaraman

Date: December 17, 2012

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Good evening. Thank you for calling this public hearing regarding the series of air quality permits requested by the Architect of the Capitol for equipment and operations at the Capitol Power Plant.

My name is Nicole Sitaraman. I am a Ward 4 resident and I am testifying before you today as a citizen concerned about the air quality, public health and energy choices of our city. I serve on the board of the Washington, D.C. Chapter of the Sierra Club and am the co-chair of the Sierra Club DC's energy committee. In addition to my involvement in the Sierra Club DC, I am actively involved in other local, grassroots environmental and renewable energy groups such as DC Solar United Neighborhoods, CarbonfreeDC and the NAACP DC Climate Justice committee. My brief testimony today represents my personal views only.

It is my understanding that the permit requests that the Architect of the Capitol has submitted would allow for increased emissions of nitrogen oxides and particulate matter which threaten public health. It appears to me that these requests are devoid of sufficient evidence justifying any increase in air pollution. And I am not persuaded that any new construction or modifications at the Plant, located in the heart of the city, is worth more than the health of the residents living near it. Increased emissions of nitrogen oxides and particulate matter are known to cause respiratory illnesses and premature deaths in communities exposed to them.

As you know, the Capitol Power Plant is located in southeast DC and the pollution from the Plant's short stacks flows to communities east of the river – communities predominantly comprised of people of color. In all candor, I highly doubt that the permits requested would have been submitted had the Capitol Power Plant been located in upper northwest DC. Without question, these requested permits have serious environmental justice implications.

The Architect of the Capitol should be working towards reducing harmful emissions, not increasing them. Further, as a federal agency, under Executive Order 12898, the Architect of the Capitol has a duty to make sure that its activities are aimed at achieving environmental justice. Indeed section 1 of the Executive Order states,

“Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human

health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.”

The Architect of the Capitol is not exempt from this provision. Should these permits be granted, they would directly contravene and fly in the face of the established environmental justice goals of the entire federal government, including the EPA which has launched an initiative specifically geared towards ensuring that environmental justice is woven into every aspect of each and every federal agency decision and action. The Architect of the Capitol simply cannot treat environmental justice as an after-thought and ignore the potential impacts of the permits it has requested on the communities surrounding it.

Further, the Architect of the Capitol has purported that it only intends to burn natural gas at the Capitol Power Plant. This position is belied by two indisputable pieces of evidence. First, the Capitol Power Plant continues to store coal on its grounds. Second, recently, the Defense Logistics Agency issued an RFP for 20,000 tons of coal to be delivered at the Plant next year. The fact that the U.S. government has requested bids for coal makes me concerned about the level of transparency or lack thereof that the Architect of the Capitol is applying to this process and the operations at the Power Plant in general.

While the permit requests do not explicitly mention coal use, there have been no assurances made to the public that the old dirtier coal burning units will be retired. To be clear, burning coal at the Plant is completely unacceptable. Coal is an extremely toxic fuel source and has no place in our city’s energy future.

Additionally, the permit requests, as submitted, blatantly undermine the sustainability goals of this city as outlined in the Sustainable DC strategy plan. As a reminder, we have a goal of cutting citywide greenhouse gas emissions by 50% by 2032. Allowing for these permits would make a mockery of Sustainable DC and the mission of DC citizens to make the city a more healthy and sustainable place to live.

With respect to the burning of natural gas at the Capitol Power Plant, I would encourage the District Department of the Environment to hold the Architect of the Capitol accountable and emphasize the importance of scaling down the use of fossil fuels and incorporating clean, locally-generated renewable energy sources. It is way past time for the nation’s capital to set an example for the rest of the country for clean energy. Instead of continuing to be a symbol for coal and fossil fuel combustion, the Capitol Power Plant should be a symbol for clean, renewable energy for the rest of the country.

Therefore, I encourage DDOE to deny these permit requests. I will defer to Irv Sheffey and Jim Dougherty to respond to questions regarding the official position of the Sierra Club. Thank you for your time.