

District of Columbia Government Advisory Neighborhood Commission 6A Box 75115 Washington, DC 20013



April 15, 2016

Tommy Wells, Director Department of Energy and the Environment 1200 First Street NE Washington, DC 20002

Re: Study of pollutants at and around the Benning Road Pepco Plant

Dear Director Wells:

At a regularly scheduled and properly noticed meeting on April 14, 2016, our Commission voted 8-0 (with 5 Commissioners required for a quorum) to submit the following comments regarding the Remedial Investigation/Feasibility Study preliminary draft:

- Since the current RI/FS is provisional or preliminary, the DOEE should provide an additional
 public comment period when the new necessary studies and evaluation have been
 completed. Additionally, Pepco and DOEE should provide another public presentation that
 incorporates any new findings from the upcoming new Field Investigation.
- 2. A fuller explanation is needed of the movement of pollutants within and adjacent to the site from this time forward. What will 25, 50, 100 year floods do to pollutants currently under the river bed or under the new hard-surface top cover of the Plant site? Will flood damage to the ground cover (vegetation or rock/cement) carry covered and buried pollutants from the Pepco site into the River?
- 3. DOEE/Pepco should provide a brief explanation near the beginning of the RI/FS document about why the deposition of the substantial air pollutants from the Power Plant is not included in this study. This is probably the greatest neighborhood adverse-effect of the many years of uncontrolled pollution from coal burning. An explanation seems required for the community to understand why this is not being considered in this Remedial Investigation.
- 4. The EPA has cited and continues to fine Pepco for the amount of heavy metal pollutants transiting from the Benning Road site. Do the measured levels of metal pollutants found at Outfall 13 indicate that this is a sufficient catch basin for all of the metals moving offsite? The investigation has found heavy metals at no other location. Why is there no evidence of a downstream plume of heavy metal deposition from Outfall 13?

Thank you for this opportunity to comment on the preliminary draft. If you have any questions, I can be contacted at philanc6a@gmail.com.

On Behalf of the Commission,

Phil Toomajian,

Chair, Advisory Neighborhood Commission 6A

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