



Eckington
Civic Association

Tommy Wells
Director, Department of Energy & Environment
1200 First Street NE, 5th Floor
Washington DC 20002

Stephen Ours
Chief, Air Quality Permitting Branch
Department of Energy & Environment
1200 First Street NE, 5th Floor
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May 17, 2022

Director Wells and Air Quality Permitting Branch Chief Ours,

On behalf of the Eckington Civic Association and Eckington community, we are writing to convey longstanding concerns about the continued operation of the Fort Myer Construction Company's asphalt plant at 2001 5th Street NE¹ and associated operations and to request that the District Department of Energy and the Environment take concrete steps to protect local residents, students, and trail users.

Eckington residents are concerned about poor air quality and associated impacts on health and quality of life as well as persistent odor, dust, and noise nuisances. This plant is located in close proximity to hundreds of Eckington homes, the Carlos Rosario International Public Charter School, and the Metropolitan Branch Trail. In meetings with DOEE staff, we have learned that Fort Myer's permit does not place any restrictions on days or times when the plant can be in operation. It was also disappointing to learn that DOEE does not have permanent equipment to measure ambient air quality in close proximity to Eckington's industrial facilities—including the asphalt plant—even though this part of the city is where District agencies

¹ We suspect that residents of the Brentwood neighborhood have similar concerns about the operations of the asphalt plant located at 1155 W St NE. We do not speak for our neighbors to the east but firmly believe that DOEE would be wise to adopt similar restrictions for the Brentwood facility.

and the D.C. Council have elected to locate the vast majority of the city's industrial activity.² In addition, local residents are frustrated that heavy trucks traveling to and from the Fort Myer facilities regularly travel on local streets where they are prohibited and that attempts to resolve that issue with the District Department of Transportation (DDOT) or the Metropolitan Police Department (MPD) have been unsuccessful. Finally, we are concerned by the lack of opportunity for regular community engagement with DOEE and Fort Myer to address issues on an ongoing basis.

We are open to discussing mitigation methods with Fort Myer and DOEE if the prospect of significant modifications to the company and the agency's approach are on the table. We suspect that such engagement is most likely to lead to productive solutions that work for everyone.

If that kind of engagement is not on the table, then we would like to make the following specific requests:

First, we are requesting that DOEE make the following modifications to the permit for the Fort Myer asphalt plant:

- Significantly reduce the overall permitted annual emissions for the Eckington asphalt plant;
- Limit the hours of operation to between 8 am and 3pm (when school lets out and when trail use is highest);
- Preclude operation of the plant on weekends (when trail use is highest);
- Preclude operation of the plant on federal and District holidays;
- Limit the asphalt plant's operations when air quality is compromised, including
 - A 50 percent reduction in permitted operations when the air quality index for DC is moderate (yellow) and
 - A complete prohibition on operations when air quality index for DC is unhealthy for certain groups (orange) or worse;
- Require truck traffic associated with the Fort Myer asphalt plant to avoid local streets on which trucks are prohibited by District Department of Transportation;³
- Require more significant odor and dust mitigation by Fort Myer at the asphalt plant and at the lot to the east of the Metropolitan Branch Trail; and
- Require Fort Myer to hold a quarterly meeting with Eckington residents and a DOEE representative where community concerns can be discussed on an ongoing basis and where data about air quality for the preceding quarter is disclosed.

² See DOEE's map of ambient air quality monitoring stations: <https://doee.dc.gov/service/ambient-air-quality-monitoring#:~:text=The%20District's%20air%20monitoring%20network,Verizon%20Center%2C%20and%20Haines%20Point>.

³ Although truck traffic is regulated by the District Department of Transportation, we believe that adherence to truck regulation should be a condition of the permit issued to Fort Myer for the asphalt plant's operation. Other efforts to enforce truck regulations in the neighborhood have been insufficient to ensure compliance.

Second, we are requesting that DOEE significantly bolster its independent monitoring of air pollution in Eckington by:

- Installing a permanent ambient air quality sampling and monitoring program to analyze for polycyclic aromatic hydrocarbons⁴ and dust in or near Eckington and Ward 5's industrial facilities;
- Installing a permanent odor monitor on the Metropolitan Branch Trail adjacent to the Fort Myer asphalt plant;
- Working with the Eckington Civic Association and the District Department of Transportation to ensure that heavy truck traffic to and from the asphalt plant and associated facilities comply with District regulations—including driving exclusively on Truck routes;
- Studying whether local topography—including the hill directly to the west of the Eckington plant—aggravates the environmental impact of emissions produced by Fort Myer operation;
- Regularly reporting to the community when harmful levels of pollutants have been detected in or near Eckington; and
- Participating in a quarterly meeting with Eckington residents and representatives of Fort Myer.

We look forward to working with DOEE and Fort Myer to resolve these concerns about the environmental impacts of the Fort Myer operation in Eckington. Please do not hesitate to contact me at eckingtoncivic@gmail.com or 202-210-1528 to discuss these matters.

Best regards,

Conor Shaw
President
Eckington Civic Association

Denise Wright
Commissioner
ANC 5E03

Hannah Powell
Former Commissioner
ANC 5E03

Shoshana Sommer
President
Eckington Parks and Arts

⁴ Polycyclic aromatic hydrocarbons are a mildly toxic substance to the Center for Disease Control.

cc: Lucinda M. Babers, Deputy Mayor for Operations and Infrastructure
Kenyan McDuffie, Ward 5 Councilmember
Mary Cheh, Ward 3 Councilmember and Chair of the D.C. Council Committee on
Transportation and the Environment