PRELIMINARY DISCUSSION ON SECOND MAINTENANCE PLAN – 2008 OZONE NAAQS

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Agenda Item 4

Metropolitan Washington
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Proposed Milestone Years

- Attainment year (AY) 2014
- Interim year (AY) - 2027 is right in the middle. Ok to use ? Any other year ?
- Final maintenance year (FY) 2040
- Need to run these proposed milestone years by EPA to make sure they are ok with the interim year selected

Proposed Inventory development options

- Point:
  - AY 2014 inventory: Retain (2008 ozone NAAQS MP Update retained it)
  - IY & FY inventories: Use 2022, 2032, and 2038 inventories just submitted for 2015 ozone NAAQS MP as starting point
- Nonpoint & Quasi-point:
  - A. Grow 2014 to IY and 2040 using COG cooperative forecast, or
  - B. Interpolate 2022 and 2032 emissions from 2015 ozone NAAQS MP
- Nonroad & Onroad: Need to use MOVES6 (released recently)
- Need to run this by EPA to make sure they are ok with the methodology

Contingency Measures

- Contingency measures – List of measures in the Initial 2008 ozone NAAQS maintenance plan need to be reviewed to make sure they are still available. If not, then perhaps new measures may need to be included
- Initial Plan Contingency Measures (Short-term)
  In case of fourth highest daily maximum eight-hour average ozone concentration or violation exceeding 0.075 ppm in any year
  - Prior to 2020 -
    - Maryland NOX Rule (Phase I)
  - Prior to 2022 -
    - Retirement of Possum Point Power Station's Unit #5 or installation of selective non-catalytic reduction on Possum Point Power Station's Unit #5, an 840 MW residual oil-fired EGU;
    - Installation of LN technology on four municipal solid waste combustors at Covanta Fairfax
    - Installation of LN technology on three municipal solid waste combustors at Covanta Alexandria/Arlington

Contingency Measures

- Initial Plan Contingency Measures (Long-term)
  In case of fourth highest daily maximum eight-hour average ozone concentration or violation exceeding 0.075 ppm in 2022 and beyond
  - 1st exceedance – 1 program from Table 6.1 below
  - 2nd consecutive exceedance – 2nd program from Table 6.1 below
  - Violation of standard – 2 programs from Table 6.1 below

Table 6-1: Contingency Control Measures

- OTC 2009-2014 model rule for VOC for consumer products (VA)
- OTC 2009-2014 model rule for VOC for architectural and industrial maintenance coatings (VA)
- On-road engine idling rule (DC)

Need to Review Contingency Measures Schedule

The District of Columbia, the State of Maryland, and the Commonwealth of Virginia commit to the implementation of any contingency measure on the following schedule:

- Schedule onset: notification received from USEPA that a contingency measure must be implemented, or three months after quality assured data determine that an exceedance or violation occurred within the previous year.
- Applicable regulation or program to be adopted six months after this date.
- Applicable regulation or program to be implemented six months after adoption.
- Compliance with regulation, or full program implementation, to be achieved within 12 months of adoption.

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