

PUBLIC COMMENTS & RESPONSE - 2015 OZONE REDESIGNATION REQUEST & MAINTENANCE PLAN

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MWAQC-TAC
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Public Hearing & Comments - Dates

- **District of Columbia:**
 - Public comment date: August 21, 2026 - September 22, 2026
 - Public hearing: September 22, 2026, 5:30 pm (Virtual)
- **Maryland:**
 - Public comment date: August 5 – September 10, 2026
 - Public hearing: September 10, 2026, 11:00 AM (virtual)
- **Virginia:**
 - Public comment date: August 24 – September 24, 2026
 - Public hearing: September 18, 2026, 1:00 PM (Woodbridge Northern Regional Office of DEQ)

Public Comments

Public comments were received by the District and Virginia in response to public hearing and comments process

Anacostia Parks & Community Collaborative (APACC) provided comments to DOEE

Southern Environmental Law Center (SELC) provided comments to VDEQ

Public Comments – APACC (District)

Subject: Unhealthy air days and a few communities experiencing disproportionate impacts

Unhealthy ozone days declined from 51 in 2005 to just 5 in 2025. The 2023–2025 regional design value is 0.069 ppm (attained standard).

DOEE addresses facility hazardous air pollutants through separate permitting, compliance, and enforcement programs.

DOEE expanded monitoring along I-295 and in Ward 8. Continued monitoring and contingency measures address future ozone violations, including heat-related risks.

MWAQC's Resource Guide for Air Quality Action supports local air quality improvements and consideration of equity and environmental justice.



Public Comments – APACC (District)

Subject: Relaxation or non-enforcement of federal rules

DOEE acknowledges the concern, but EPA approval would make the maintenance plan federally enforceable, which will ensure that air quality does not violate ozone standard again.

Hazardous air pollutant exemptions cited by commentator do not change controls relied on by the ozone plan. The ozone redesignation plan is a separate action.

Contingency measures in the plan will be implemented to quickly fix any future violations of the standard.



Public Comments – APACC (District)

Subject: The District should reject weakened SIP requirements and complete all SIP obligations at the highest level

The plan commits to continued implementation of ozone controls included in the SIP before redesignation.

Clean Air Act protections bar SIP revisions that interfere with attainment or maintenance of a national ambient air quality standard.

Ozone Transport Region requirements for reasonably available control technology (RACT) and new source review continue regardless of attainment status.

Public Comments – SELC (Virginia)

Subject: Retention of all existing SIP control measures

DEQ agrees that the maintenance plan must explicitly commit to retaining controls in the SIP before redesignation.

Section 4.1.2 already commits to enforcing applicable requirements of prior SIP revisions. A statement has been added to Section 6.4 regarding the continuation of the existing control measures.

The draft adds a commitment in Section 6 for DC, Maryland, and Virginia to continue all existing SIP control measures for the area.

DEQ has requested no removal of these controls. Any future SIP change would require public participation.

Public Comments – SELC (Virginia)

Subject: Quicker implementation of contingency measures

DEQ disagrees and retains the 24 month schedule, citing EPA guidance to implement measures as expeditiously as practicable and within 24 months.

The plan provides a non-exhaustive list of controls for an ozone standard violation or emissions above the attainment year inventory.

At the trigger, states will use current modeling and emissions tools to select effective measures that can be implemented promptly.

The 24 month timeline allows time for rule development, stakeholder engagement, and required public participation.

Public Comments – SELC (Virginia)

Subject: CAA Part D requirements: NNSR and RACT

Virginia is preparing the outstanding nonattainment new source review (NNSR) and RACT certification documents.

Virginia expects to make the documents available for public comment and submit them in time for EPA to approve the redesignation request.

Northern Virginia is in the Ozone Transport Region, so NNSR and RACT requirements continue regardless of air quality, designation, or classification.

Public Comments – SELC (Virginia)

Subject: Emission estimates from data centers not adequately addressed

DEQ considers the inventory adequate. All data centers required to be listed as point sources are included in that category. Remaining centers fall in the area/nonpoint inventory.

DEQ acknowledges emission projection uncertainty, but data center NOx emissions are smaller compared to other categories and growth ratios applied to them are significantly higher compared to other stationary sources.

Generator permits require emissions controls. DEQ cites selective catalytic reduction at local power plants and the emissions margin to address growth uncertainty.

DEQ is undertaking monitoring project near data center clusters and has a website showing permits issued to data centers. Emissions above attainment year levels would trigger contingency measures.

Technical Correction– Virginia

Subject: Updates to point source emissions data

DEQ removed duplicate emissions for one facility in the 2022, 2032, and 2038 inventories.

DEQ revised the conversion from annual emissions to ozone season tons/day for some emergency generators.

DEQ corrected unit and process identifiers and updated point source and total area emissions in both documents.

The corrections retain the draft's conclusion that the area meets the 2015 ozone standard and will maintain compliance through 2038.

Technical Correction– Virginia

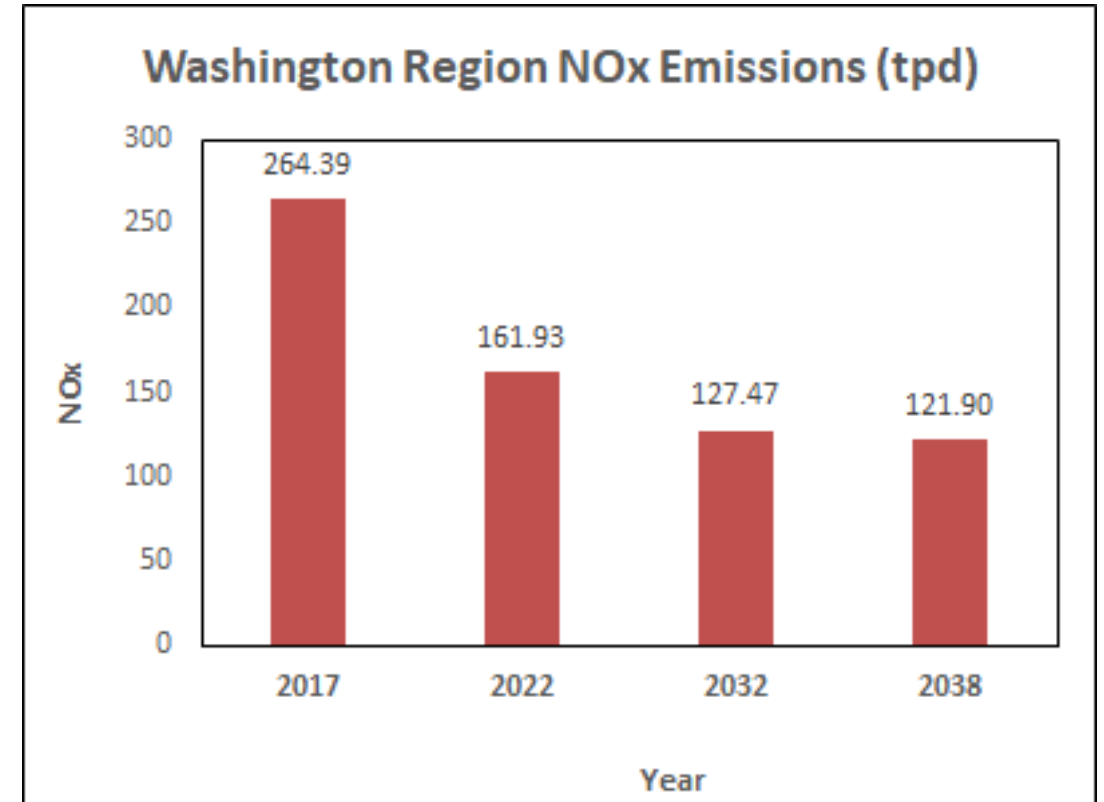
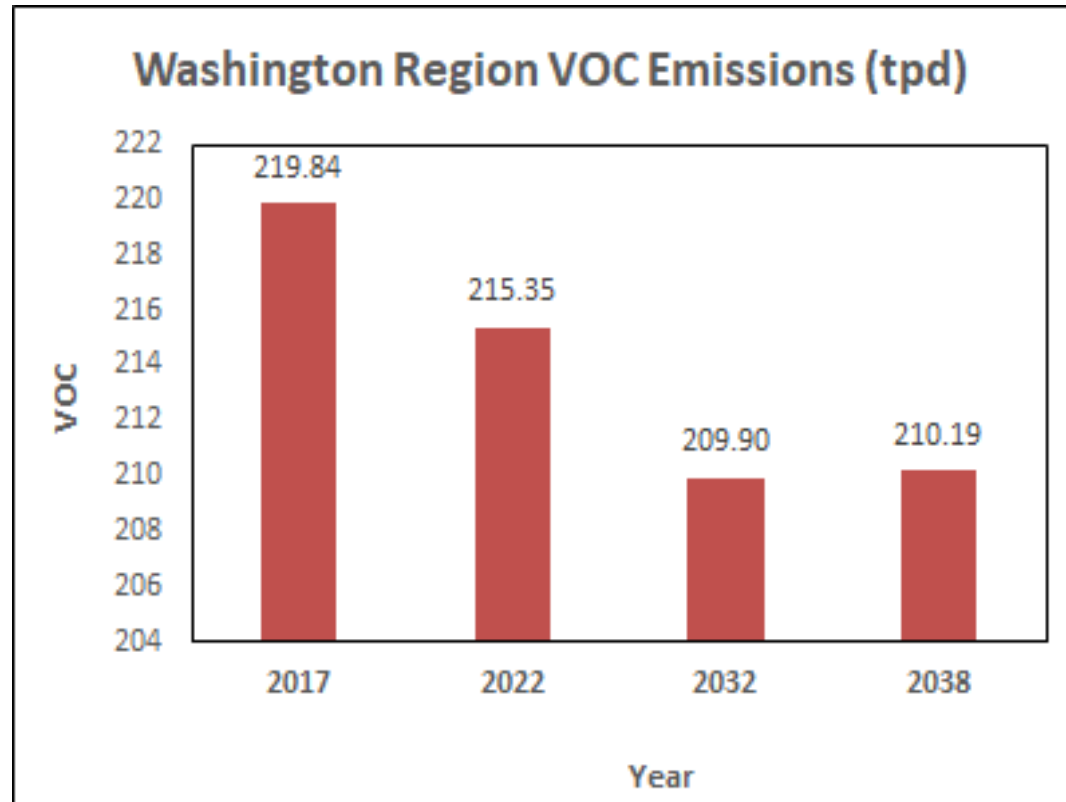
Updated Point Source and Total Emissions for Virginia and NAA, tpd									
Jurisdiction	NOx					VOC			
	2017	2022	2032	2038		2017	2022	2032	2038
Arlington	0.25	0.00	0.00	0.00		0.02	0.00	0.00	0.00
Fairfax County	10.39	5.49	5.65	5.71		0.81	0.55	0.50	0.50
Loudoun County	10.44	1.02	1.19	1.15		0.71	0.07	0.08	0.08
Prince William County	6.36	1.86	1.82	1.72		0.52	0.35	0.23	0.23
Fairfax City	0.01	0.02	0.02	0.03		0.30	0.34	0.29	0.29
Falls Church City		0.00	0.00	0.00			0.00	0.00	0.00
Manassas City	0.54	0.22	0.26	0.28		0.13	0.10	0.11	0.12
Manassas Park City		0.00	0.00	0.00			0.00	0.00	0.00
Alexandria City	1.37	0.81	0.81	0.81		0.02	0.00	0.00	0.00
New NAA Point Source Total	79.55	45.98	52.71	53.74		5.19	4.53	4.64	4.75
Old NAA Point Source Total	79.55	56.95	64.68	66.70		5.19	5.02	5.21	5.37
Δ NAA Point Source Total	0.00	10.97	11.97	12.96		0.00	0.49	0.57	0.62
New NAA Total (without MVEBs)	264.39	161.93	127.47	121.90		219.84	215.35	209.90	210.19
Old NAA Total (without MVEBs)	264.39	172.90	139.44	134.85		219.84	215.83	210.46	210.80
Δ NAA Total (without MVEBs)	0.00	10.97	11.97	12.95		0.00	0.48	0.56	0.61
New NAA Total (with MVEBs)	264.4	161.9	136.9	128.3		219.8	215.4	214.2	213.9
Old NAA Total (with MVEBs)	264.4	172.9	148.9	141.3		219.8	215.9	214.8	214.5
Δ NAA Total (with MVEBs)	0.0	11.0	12.0	13.0		0.0	0.5	0.6	0.6



Updates to Redesignation Request & Maintenance Plan Documents

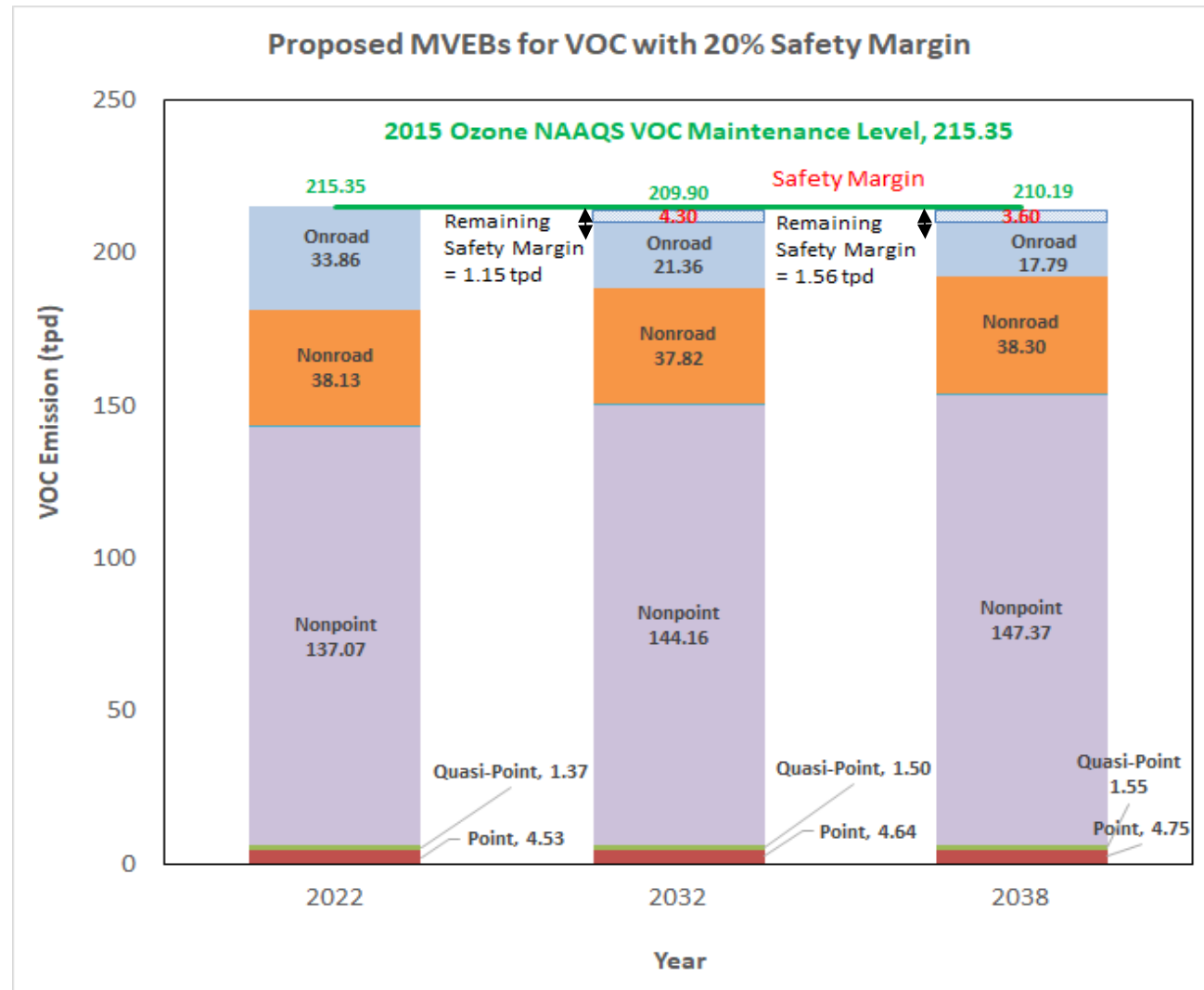
- Appendix A1 - Includes updated Virginia's point source emission white paper.
- RR Document - Table 3-2 updated with revised VA point source emissions.
- MP Document - Tables 5-1, 5-3, and 5-6 updated with revised VA point source emissions. A statement added to reflect continuation of control measures in the SIP prior to redesignation.
- Appendix B2 (Paragraph 4) - Added to clarify quasi-point source projection methodology. The current version said erroneously that emissions for these sources don't change in the future.
- Appendix E - Draft notices for public hearing and comments and technical corrections

Updated Emissions – Lower in Future



* Base Year Emissions Inventory for 2017 approved earlier by EPA was updated with MOVES5.0.0 based onroad and nonroad emissions

Emissions & Motor Vehicle Emission Budgets–VOC (tpd)



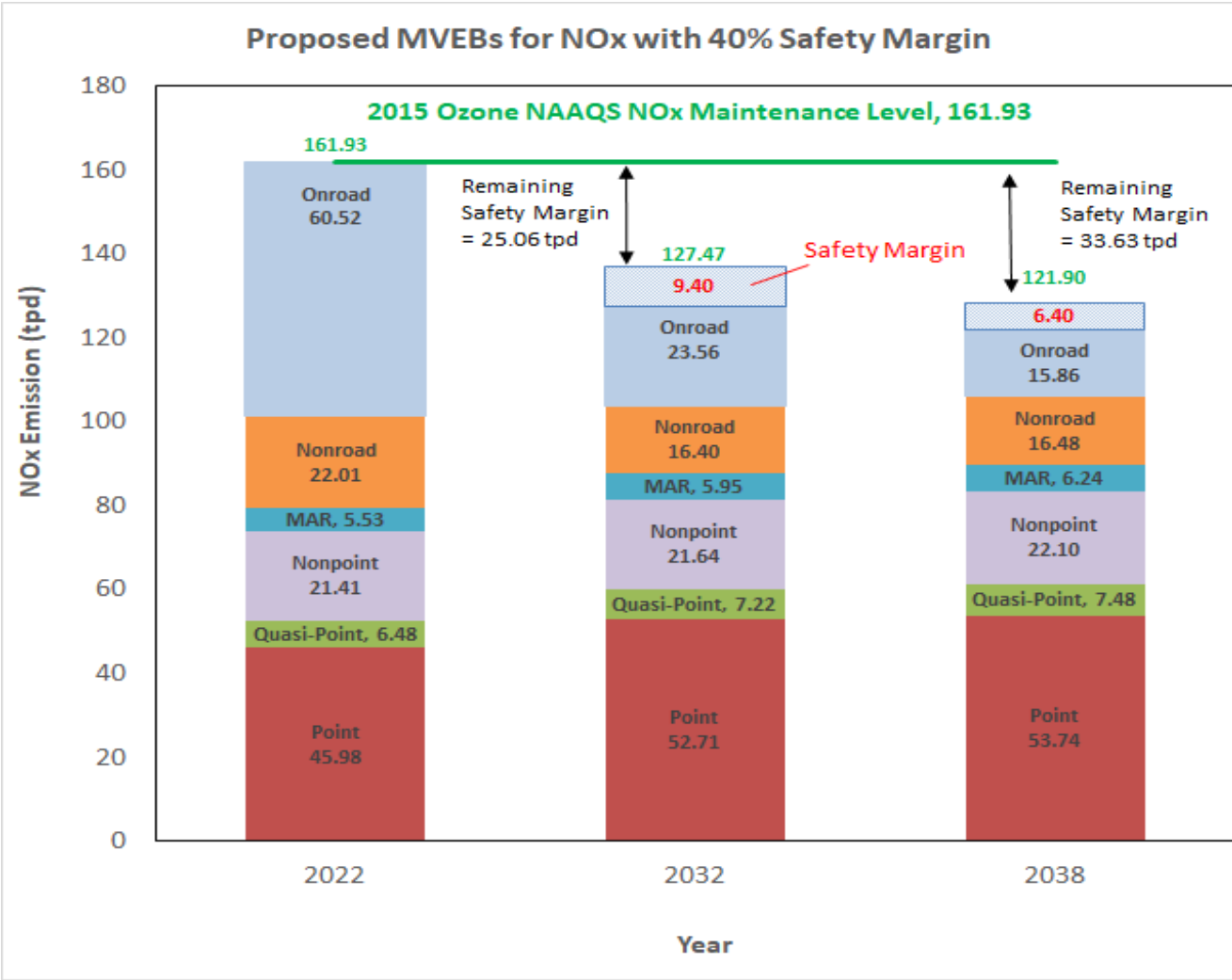
VOC MVEBs (20% Safety Margin)

2032: 21.4 + 4.3 = 25.7 tpd

2038: 17.8 + 3.6 = 21.4 tpd



Emissions & Motor Vehicle Emission Budgets–NOx (tpd)



NOx MVEBs (40% Safety Margin)

2032: 23.6 + 9.4 = 33.0 tpd

2038: 15.9 + 6.4 = 22.3 tpd



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