

2015 Ozone Standard Redesignation Request & Maintenance Plan

Sunil Kumar
Principal Environmental Engineer

MWAQC
December 4, 2024

Background

- Current official ozone design value based on 2021-23 data is 71 ppb, which is above the current 2015 ozone standard (70 ppb).
- A few high ozone days in 2023 were influenced by wildfires that were outside the Washington region (Canada, Jew Jersey). Therefore, the District applied for the “Exceptional Events” waiver to exclude data from those days in the design value calculation. EPA recently granted the District that waiver for June 23, 2023 data.
- As a result, the Washington region’s design value came down to 70 ppb, which brings the region into compliance with the above standard.

Background

- EPA proposed in November and is expected to finalize the “Determination of Attainment by the Attainment Date” and EE Waiver in Spring next year.
- Having attained the current standard, the Washington region is planning to develop and submit to EPA a request to redesignate the region to attainment/maintenance area for the above standard along with a maintenance plan to demonstrate continued attainment in the future.
- To start the process, the region has sent a list of questions to EPA regarding the requirements to submit the above plans, the identification of milestone years, and emissions inventories to be used in the plan.



Questions for EPA

- Following questions were sent to EPA -
 - Proposed milestone years:
 - Base Year: 2017
 - Attainment Year 2022
 - Interim Year: 2032
 - Maintenance Year: 2038
 - Emission Inventories:
 - Need to update onroad and nonroad inventories in the BY2017 inventory document (developed using MOVES2014b model) using the new MOVES4.0.1 model)?
 - EPA's new model "MOVES5.0.0" expected in December 2024. Would EPA still allow the region to use MOVES4.0.1 as this will save us time for testing the new model and/or possibly developing inputs in new format? This version produces higher emissions in the future compared to MOVES5.0.0 so the maintenance demonstration using it will be conservative.

Questions for EPA

- Requirements for submittal of Redesignation Request/Maintenance Plan
 - The District, Maryland, and Virginia need to complete certain requirements such as, Moderate Nonattainment area New Source Review, RACT, and a few components of interstate transport, etc. Do they need to be completed before the region can submit RR/MP?
- Emission Reduction Credits for retired power plants in Maryland:
 - Morgantown, Chalk Point and Dickerson power plants shut down in 2022 and are considering applying for Emission Reduction Credits (ERCs). How are ERCs accounted for in the Redesignation Request & Maintenance Plan emissions inventory?

Draft Schedule

Preliminary Draft 2015 Ozone NAAQS RR/MP Schedule (MWAQC-TAC, 10/8/2024)

Tasks	2024			2025												2026												
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Proposal to EPA - Milestone Years & Inv Dev Methodology	█																											
EPA Response		█																										
Point (EPA Modeling Inv from MARAMA)			█																									
Non-Point (EPA Modeling Inv from MARAMA)			█																									
MOVES Inputs from States			█																									
QA/QC of States' MOVES Inputs & Dev. of Met Inputs				█																								
Base Year 2017 Onroad Update					█	█																						
Base Year 2017 Nonroad Update					█																							
Attainment Year 2022 Onroad							█	█																				
Attainment Year 2022 Nonroad							█																					
Interim Year 2032 Onroad									█	█																		
Interim Year 2032 Nonroad								█																				
Final Year 2038 Onroad											█	█																
Final Year 2038 Nonroad								█																				
Motor Vehicle Emissions Budgets																												
Contingency Measures					█	█	█	█	█	█	█	█	█	█														
Plan Document Update										█	█	█	█	█	█													
EPA Review & Comment, Staff incorporates comments																█	█	█										
MWAQC Approval for Public Comments																			█	█								
Public Hearings																					█	█						
Address Public Comments & Finalize SIPs																						█	█	█				
States Submit 2008 MP Update																									█	█	█	

MWAQC-TAC & MWAQC Meeting Dates in 2026

April: MWAQC-TAC-14, MWAQC-Exec Com-15

May: MWAQC -15 (Backup)

September: MWAQC-TAC-15, MWAQC-23

Sunil Kumar

Principal Environmental Engineer
(202) 962-3244 / skumar@mwkog.org

mwkog.org

777 North Capitol Street NE, Suite 300
Washington, DC 20002