



March 12, 2021

Acting Administrator Jane Nishida
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Docket ID No. EPA-HQ-OAR-2020-0351

Subject: Comment on the Ozone Transport Commission Recommendation for Daily NO_x Emission Limits for Certain Electric Generating Units in Pennsylvania under the Clean Air Act Section 184(c)

Dear Administrator Nishida:

The Metropolitan Washington Air Quality Committee (MWAQC) appreciates the opportunity to comment on the United States Environmental Protection Agency's (EPA) Supplemental Notice concerning the "Ozone Transport Commission Recommendation that EPA Require Daily Limits for Emissions of Nitrogen Oxides From Certain Sources in Pennsylvania" (Supplemental Notice), published in the Federal Register on January 15, 2021 (86 FR 4049).

MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans demonstrating attainment of federal ozone and other criteria pollutant standards for the Washington, DC-MD-VA non-attainment area. We have done so successfully for more than 25 years through a partnership among the state and local governments in the metropolitan Washington region.

~~MWAQC supports the recommendation put forward by the Ozone Transport Commission (OTC) for implementing Daily NO_x Emission Limits for Certain Electric Generating Units (EGUs) in Pennsylvania under the Clean Air Act (CAA) Section 184(c).~~

The metropolitan Washington region has been designated as a Marginal non-attainment area for the 2015 ozone National Ambient Air Quality Standards (NAAQS). Despite local and regional actions that have helped meet previous ozone standards, the region did not meet the 2015 ozone NAAQS by the required deadline: the draft design value for the period 2018-2020 was 71 ppb, which was 1 ppb above the standard. Consequently, the region places a high priority on actions that can reduce ground-level ozone and its precursors such as, nitrogen oxide (NO_x), including ones that come from upwind areas in order to meet the above NAAQS as expeditiously as possible.

Coal-fired EGUs are major sources of NO_x emissions and they contribute significantly towards the Washington region's ozone levels. Pennsylvania along with other upwind states, contribute to One of the sources of this regional transport of emissions into the Washington region's NO_x emissions is EGU emissions transported from Pennsylvania. For example, Aa modeling study conducted by the OTC showed that Pennsylvania contributed high concentrations of ozone to monitors located in McMillan (District of Columbia), Prince George's Equestrian Center (Maryland), and Aurora Hills

(Virginia) towards fourth-highest daily maximum 8-hour average values for those monitors.¹ Analysis conducted by the state of Maryland shows that on some days the Pennsylvania EGUs release about 30 tons of excess NOx. Since design value calculations include worst case days, these high levels of NOx emissions from Pennsylvania EGUs contribute to the Washington region exceeding the NAAQS.

Therefore, it will be difficult for the Washington, DC- MD-VA 2015 ozone non-attainment area to attain and maintain the 2015 Ozone NAAQS without the emissions reductions that this petition would ensure. For this reason, it is critical that EPA require states like Pennsylvania to implement post combustion controls in its coal-fired EGUs to meet daily emission limits.

MWAQC understands that EPA is developing new emissions budgets for Pennsylvania's EGUs and other states as part of the latest version of the Cross-State Air Pollution Rule (CSAPR), which is scheduled to be implemented beginning this ozone season (2021). This rule, when fully implemented, will certainly help reduce NOx transport in the metropolitan Washington region and help the region's efforts to attain the current (2015) NAAQS as quickly as possible.

MWAQC ~~is also aware~~acknowledges of Pennsylvania's proposed Reasonably Available Control Technology (RACT III) program, which, once implemented, ~~that~~ may also provide the kind of NOx emissions reductions similar to those expected by the OTC's 184(c) recommendation.

MWAQC supports EPA's CSAPR as it is expected to provide earliest the emissions benefits, crucial for the Washington region to meet the current (2015) ozone NAAQS as expeditiously as possible. MWAQC is, however, aware of previous changes and delays in the implementation of CASPR and is unsure of Pennsylvania's commitment for timely implementation of RACT. Consequently, approving the 184(c) petition could result in more immediate reductions in the event CSAPR and RACT implementations are delayed. For this reason, MWAQC requests EPA to approve the OTC's recommendation. MWAQC is willing to work collaboratively with EPA Headquarters, Region III, and Pennsylvania on this issue.

The health of residents in the Washington region is greatly impacted by these exceedances. A BenMap modeling study conducted by the OTC has shown that in the Washington, DC-MD-VA 2015 ozone nonattainment area, several lives would not have ended prematurely (Figure 42) had the ozone NAAQS been met, which comes at significant economic cost (Figure 45).² Beyond this there are the impacts of asthma exacerbations, increase in number and duration of hospitalizations, reduced lung function, and loss of work and education days (Table 5).² Action is clearly needed that responds to ~~Given~~ the adverse impacts caused by Pennsylvania EGUs that do not run installed controls, ~~appears to have on the region's air quality, action is needed.~~

Therefore and in closing MWAQC supports the recommendation put forward by the Ozone Transport Commission (OTC) for implementing Daily NOx Emission Limits for Certain Electric Generating Units

¹ Ozone Transport Commission (OTC). "Ozone Transport Commission/Mid-Atlantic Northeastern Visibility Union 2011 Based Modeling Platform Support Document – October 2018 Update." October 2018, Appendix D (Page D-196 & D-198).

² Ozone Transport Commission (OTC). "Analysis of the Potential Health Impacts of Reducing Ozone Levels in the OTR Using BenMAP - 2020 Edition." September 16, 2020.

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(EGUs) in Pennsylvania under the Clean Air Act (CAA) Section 184(c). MWAQC would also welcome any alternative means that would address this situation in a meaningful and timely manner.

~~In closing, MWAQC supports EPA requiring Pennsylvania EGUs with post combustion controls to have daily NOx limits during ozone season in line with the OTC 184(c) petition and in line with the rules in place in Maryland, Delaware and New Jersey.~~

Thank you for the opportunity to comment.

Sincerely,

The Honorable Robert Day
Chair, Metropolitan Washington Air Quality Committee (MWAQC)