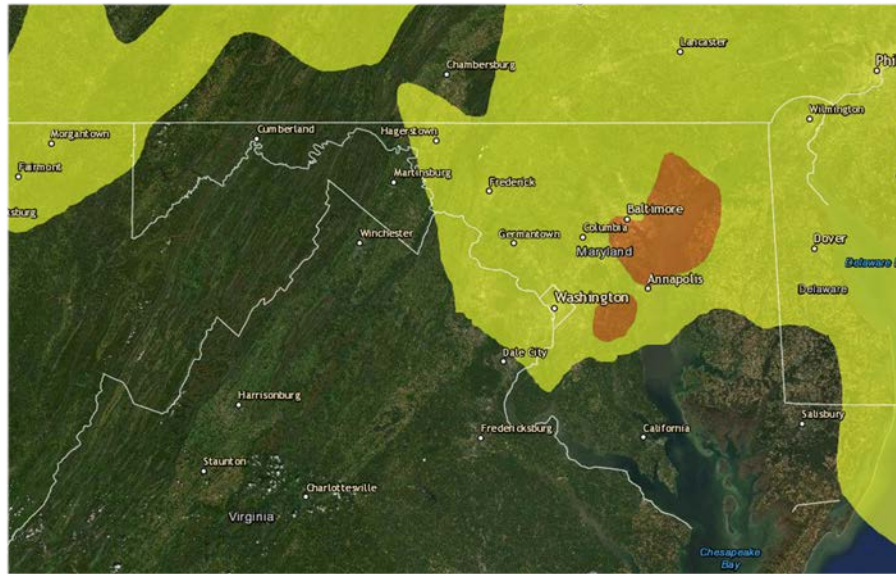




Maryland  
Department of  
the Environment

# Maryland's Peak Ozone Day Partnership

*How About a Similar Effort in the Washington NAA?*





# Overview of Presentation

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- The Peak Ozone Day Partnership Program
  - Started in 2017 around the Baltimore area
  - Purpose of Program
  - Moving Towards Attainment
  - How the Program Works
- What our analyses of the 2020 ozone season tells us to date
  - Units that operated on peak day partnership action days - Did cleanest units run?
  - Operation of emergency generators
- Moving Forward
  - Why 2021 is an absolutely critical year
  - Status of potential regulation





# Why Peak Ozone Days?

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- Four key reasons:
  - Getting closer to attaining the ozone standard each year
  - Public health risks from ozone are highest on the worst days
  - The monitoring attainment test focuses on peak ozone days
    - We get to attainment if the 3-year average of the 4<sup>th</sup> highest level at individual monitors ... during three consecutive years ... is below 70 ppb
  - A meteorology and emissions perfect storm
    - Peak days for ozone happen when the weather is hot
    - When it's hot ... energy units run the most ... clean and less clean units
- Shaving the ozone peaks will reduce risk, help us towards attainment and reduce future regulatory burden on the energy sector



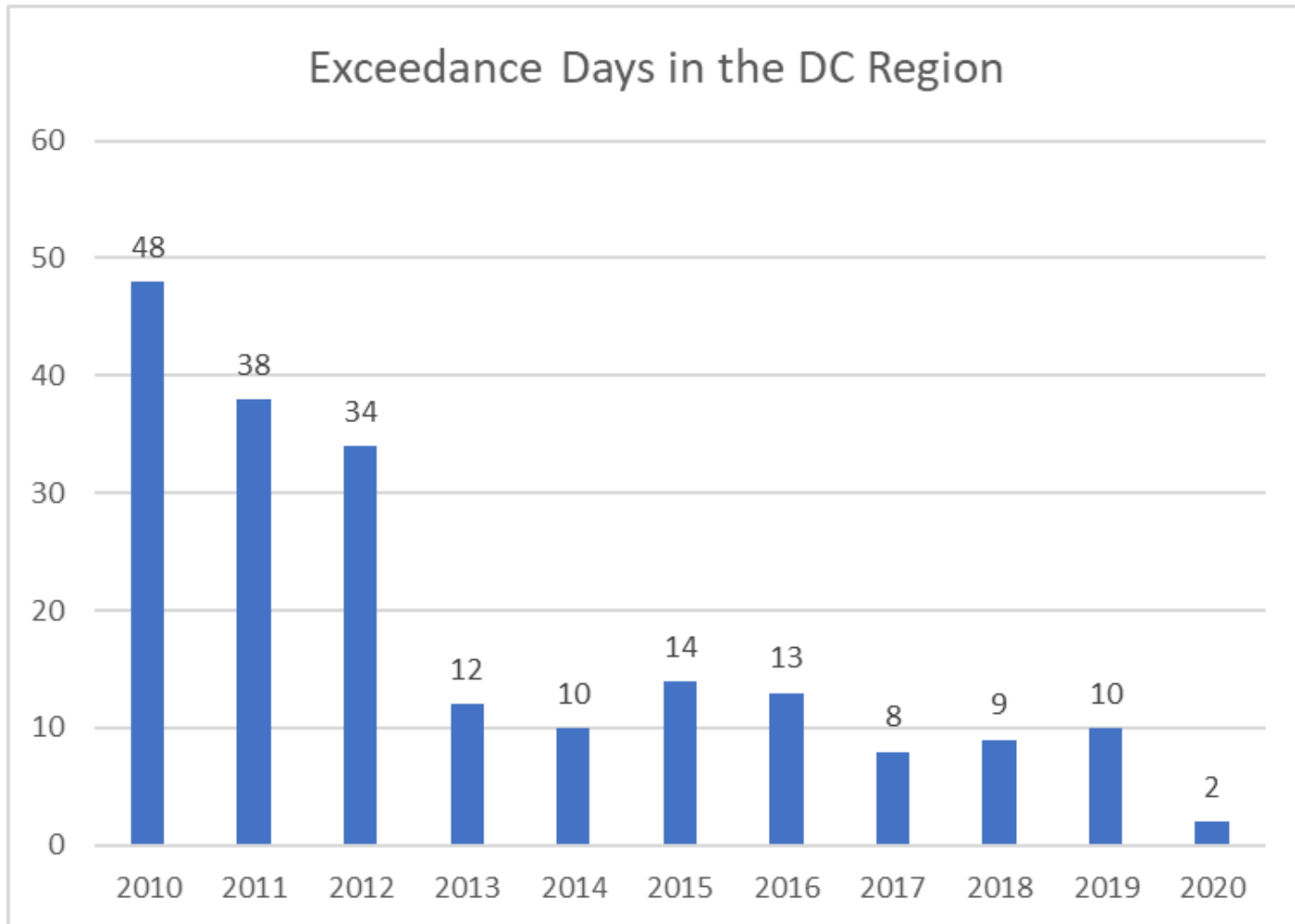
# Moving Towards Attainment

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- The Washington Region is very close to attaining the ozone standard
  - Record low ozone levels in 2020
  - The Washington Nonattainment Area is very close to meeting the 2015 ozone standard based on 2018, 2019, and 2020 data
  - Imperative that 2021 ozone levels remain low
  - Peak day efforts can be a huge factor towards attainment in 2021
- 2020 ozone levels are complicated but a major step forward
  - Improvement consistent with program driven trends ... however
  - COVID lockdown reduced spring and early summer emissions
    - About a 50% reduction in commuter traffic following stay-at-home order
  - Meteorology also favorable to lower ozone



# Washington Region Bad Ozone Days





# The Science Behind the Peak Day Partnership

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- Maryland works with the University of Maryland and other researchers to understand what it will take to continue to lower ozone levels in the region
- In a nutshell ... there are two pieces to the region's ozone problem
  - A widespread regional piece ... best addressed with regional programs to reduce ozone transport
  - A peak day local piece ... best addressed by local measures on high emitting "peak day" emission sources
- VA and MD 2017 and 2018 "OWLETS" studies focused specifically on this peak day issue
- More detailed OWLETS briefing available if desired



# How Much Work Will this be for the Washington NAA?

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- Builds from the forecasting program
  - So that piece is already done
- Would need to identify the top 30 or 40 peak day emitters in the region
  - This should not be hard – data is readily available – experts in VA, DC and MD can do this in their sleep
- Will need to have communication materials
  - Already done for Baltimore – could just be modified slightly and used for the Washington region
- So ... not a lot of work

A bright sun shining through a blue sky with white clouds. The sun is positioned in the upper right quadrant, casting rays across the sky. The clouds are scattered and vary in density, with some appearing as soft, white puffs and others as more defined, layered formations. The overall scene is bright and clear, suggesting a sunny day.

# 2021 PEAK DAY PARTNERSHIP

*HOW THE PROGRAM WORKS*





# The Current Program in Four Simple Steps

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1. We forecast that bad ozone is expected in MD:
  - Ozone forecasting begins mid-April and ends late-September
  - DC and VA already do this
  
2. We send partners notices:
  - Multi-day advance warning notice when we can
  - Call To Action Notice for next day
  
3. We ask Partners do what they can... extra action... that is reasonable... to help reduce nitrogen oxide (NO<sub>x</sub>) emissions on a few days each summer... send operational data to MDE
  
4. We attain the standard
  - Less risk to the public health
  - Less regulatory burden on partners



# Sample Email Notices

## Peak Ozone Day Reduction Partnership Program Multi-Day Advance Notice

### *High Ozone Expected Soon!*

Thank you for your participation in MDE's 2021 Peak Ozone Day Reduction Partnership Program designed to reduce nitrogen oxide (NOx) emissions and lower ozone levels on peak ozone days.

Forecast conditions indicate rising ozone concentrations are expected to develop and an ozone air quality exceedance may occur in Maryland on [insert day, date]. Advance forecasts generally provide a good indication that an air quality exceedance may occur. 3-day public forecasts can be found on the MDE website at:

<http://mde.maryland.gov/programs/Air/AirQualityMonitoring/Pages/index.aspx>

As part of this program, please begin thinking about implementing the measures described below to minimize emissions on and before the forecast exceedance day.

Please optimize current NOx emission control technologies to minimize NOx emissions and make all other reasonable efforts to reduce NOx emissions. If feasible, do not run units during peak ozone days or switch to cleaner units.

For your units subject to the emission reduction optimization requirements of COMAR 26.11.38.03A(2), please make all reasonable efforts to run at rates that are at or below the indicator rates listed at COMAR 26.11.38.05A(2).

For Curtailment Service Providers (CSPs), do not advise clients to test or operate on-site generators, unless there is a true energy emergency. Advise clients to take any other reasonable actions that can be performed to reduce NOx emissions.

MDE will issue a Call to Action if the forecast continues to indicate that an air quality exceedance is likely to occur. Any additional efforts to minimize TOTAL NOx emissions prior to the anticipated exceedance day would be greatly appreciated.

If you have any questions about the Peak Ozone Day Reduction Partnership Program contact Randy Mosier at 410-537-4219 or [randy.mosier@maryland.gov](mailto:randy.mosier@maryland.gov).

Please do not respond directly to this e-mail. The originating e-mail account is not monitored.

## Peak Ozone Day Reduction Program Call-to-Action Notice

### *Curtail NOx Emissions Tomorrow if Possible!*

Thank you for your participation in MDE's 2021 Peak Ozone Day Reduction Partnership Program designed to reduce nitrogen oxide (NOx) emissions and lower ozone levels on peak ozone days.

An ozone air quality exceedance day is forecast to occur in Maryland tomorrow, [insert day, date]. As requested, MDE is asking you to take all reasonable steps to minimize NOx emissions. Taking actions to minimize NOx emissions the day before and the day of a predicted ozone exceedance helps to reduce the possibility of poor air quality occurring in the region.

At a minimum, MDE is asking you to consider implementing the measures described below:

Please optimize current NOx emission control technologies to minimize NOx emissions and make all other reasonable efforts to reduce NOx emissions. If feasible, do not run units during peak ozone days or switch to cleaner units.

For your units subject to the emission reduction optimization requirements of COMAR 26.11.38.03A(2), please make all reasonable efforts to run at rates that are at or below the indicator rates listed at COMAR 26.11.38.05A(2).

For Curtailment Service Providers (CSPs), do not advise clients to test or operate on-site generators, unless there is a true energy emergency. Advise clients to take any other reasonable actions that can be performed to reduce NOx emissions.

Any efforts to minimize TOTAL NOx emissions would be greatly appreciated.

MDE kindly requests a summary report in Excel format the day following each Call to Action. In the report, please submit the hourly operating data for each Call to Action Day including: hourly averages of NOx Rate, MWg generated (as applicable), Heat Input (MMBTU), and urea injection rate (as applicable). Please also provide the daily NOx tons emitted. Note any special actions taken to minimize NOx emissions and note any malfunctions impacting NOx emissions during Call to Action days. If possible, include the anticipated reduction in NOx emissions attributable to actions taken. For CSPs, please indicate that clients were not called to test or operate on-site generators. If on-site generators operated, provide reason, hours of operation and the tons of NOx generated during the event

Information may be sent to Susan Nash at [susan.nash@maryland.gov](mailto:susan.nash@maryland.gov).

If you have any questions about the Peak Ozone Day Reduction Partnership Program contact Randy Mosier, MDE 410-537-4219 or [randy.mosier@maryland.gov](mailto:randy.mosier@maryland.gov).



# MDE's Ask of Existing Partners

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- Our basic ask: Continue to do everything you can to minimize NOx emissions on the day of ... and the days leading up to ... forecasted ozone exceedances
- Our simple specific asks:
  - For units subject to the MD emission reduction optimization requirements of COMAR 26.11.38.03A(2) ... please make all reasonable efforts to run at rates that are at or below the indicator rates listed at 26.11.38.05A(2)
  - For Municipal Waste Combustors (MWC), optimize the use of your current control technologies to minimize NOx emissions and make all other reasonable efforts to reduce NOx emissions
  - For other units that are not subject to COMAR 26.11.38, MDE asks that they not operate or limit their operating time, and make all reasonable efforts to minimize NOx emissions if required by PJM to operate
  - Report to MDE after each call-to-action notice



# Curtailment Service Providers

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## *Curtailment Service Providers*

- Our basic ask: Do everything you can to minimize NOx emissions from your clients on the day of... and the days leading up to... forecasted ozone exceedances
- MDE ask for CSPs:
  - Do not advise clients to perform any type of testing for on-site generators
  - Do not advise clients to operate on-site generators
    - Unless there is a true energy emergency
  - Advise clients to take any other reasonable actions that can be performed to reduce NOx emissions
  - Report to MDE after each call-to-action notice



# Data We Need from Sources After Each Call-To-Action Notice

## Day After Reporting from Partners

- Work with your MDE contact - Data in EXCEL spreadsheet form including hours operated, hourly averages for the forecast day of NO<sub>x</sub> Rate, MWg generated and Heat Input (MMBTU), and urea injection rate as applicable
- Include any notes - malfunctions, extra things done to minimize NO<sub>x</sub>, avoided NO<sub>x</sub> emissions, etc.
- Include the tons of NO<sub>x</sub> generated during the event
- For CSPs, please indicate that clients were not called to test or operate on-site generators
  - If on-site generators operated, provide reason, hours of operation and the tons of NO<sub>x</sub> generated during the event
- MDE will monitor PJM actions via PJM web site





# Units in the Peak Day Program

Unit	COMAR 26.11.38 (MDs Optimization Reg)	MWC	Other Unit
Brandon Shores Units 1 and 2	✘		
Chalk Point Units 1 and 2 *	✘		
Chalk Point Unit GT2			✘
H.A. Wagner Unit 3	✘		
H.A. Wagner Units 1, 2 and 4			✘
Morgantown Units 1 and 2	✘		
Morgantown GT3, GT4, GT5, and GT6			✘
Perryman CT1, CT3 and CT4			✘
Vienna 8			✘
Montgomery County RRF		✘	
Wheelabrator Baltimore, LP		✘	

**Total - 29 units that are likely to impact the Baltimore, Washington and Philadelphia nonattainment areas**

\* Scheduled to retire on June 1, 2021



# 2021 New Partners

Unit	COMAR 26.11.38 (MDs Optimization Reg)	MWC	Other Unit
Chalk Point GT 3, 4, 5, & 6			✘
Dickerson GT 2 & 3			✘
Chalk Point 3 & 4			✘



# CSPs in the Peak Day Program

Company*	Active in 2020
CPower	✘
Enel X	✘
NRG Curtailment Solutions	✘

\*These companies are active in DC and VA.





# Potential New Partners in DC and VA

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- Based on the recently submitted 2017 Emissions Inventory SIP for the Washington Region:
  - U.S. Capitol Power Plant (DC)
  - U.S. GSA Central Heating and Refrigeration Plant (DC)
  - Covanta Fairfax Units 1,2,3, and 4 (VA)
  - Panda Stonewall Units CT1 and CT2 (VA)
  - Possum Point Units 3,4,5,6A, and 6B (VA)

A bright sun is positioned in the upper right quadrant of the image, casting a strong glow and creating a lens flare effect. The sky is a deep, clear blue, and several large, fluffy white cumulus clouds are scattered across the scene, particularly on the left and right sides. The overall atmosphere is bright and clear.

# REGULATORY HELPERS AND PJM DEACTIVATIONS



# 2020 EGU Regulatory Helpers

- MD - COMAR 26.11.38 - Control of NO<sub>x</sub> Emissions from Coal-Fired Electric Generating Units (EGUs)
  - By 2020 all coal-fired EGUs must:
    - Be controlled with state-of-the-art Selective Catalytic Reduction control technology ... or
    - Convert to natural gas ... or
    - Meet very stringent system wide emission limits equivalent to SCR controls on all units
  - These requirements have pushed energy generation to cleaner units on peak ozone days





# PJM Deactivations

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- Maryland Peak Day units deactivated in 2020:
  - Westport 5
    - Shutdown confirmed June 1, 2020
  - Wagner 2
    - Ceased coal combustion June 1, 2020
    - Will no longer burn coal, but will continue to burn NG for on-site utilities
  - Notch Cliff GT1 – GT8
    - Shutdown confirmed June 1, 2020
  - Dickerson Units 1, 2 and 3
    - Ceased coal use on July 30, 2020; PJM retirement date of August 3, 2020
- Chalk Point Units 1 and 2 proposed retirement dates of June 1, 2021
- Will increase the use of cleaner units operating during peak days

A bright sun shining through a blue sky with white clouds. The sun is positioned in the upper right quadrant, casting rays across the sky. The clouds are scattered and vary in density, with some appearing as soft, white puffs and others as more defined, layered formations. The overall scene is bright and clear, suggesting a sunny day.

# 2020 PEAK DAY PARTNERSHIP

*WHAT HAPPENED? WHO DID WHAT?*



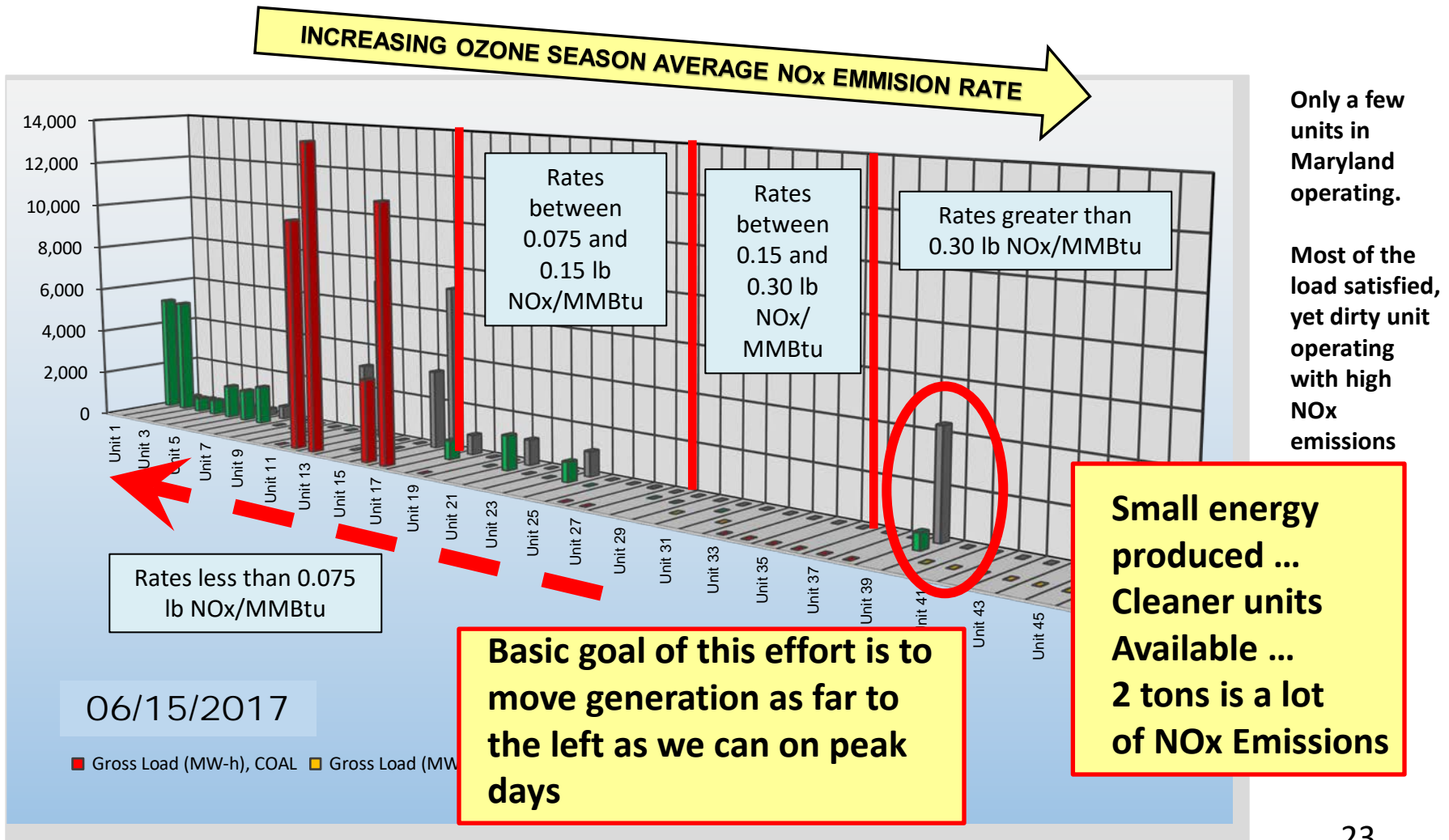
# Five Action Days Called

Date Forecast	Forecast MD Max O3 (ppb)	Actual MD Max O3 (ppb)	Hit/False Alarm
June 9 <sup>th</sup>	73	72	Hit
July 18 <sup>th</sup>	75	73	Hit
July 27 <sup>th</sup>	71	61	Voluntary Action? False Alarm?
July 30 <sup>th</sup>	72	69	Voluntary Action? False Alarm?
August 10 <sup>th</sup>	72	68	Voluntary Action? False Alarm?



# Who Emitted ... At What Rates

## Emissions Data Collection and Analysis





# June 9 Operational Data

## Units That Did Not Run

Unit	Comment
Brandon Unit 2	Did Not Operate
Wagner Units 2 and 4	Did Not Operate
Morgantown Unit 2	Did Not Operate
Morgantown GT3, 4, 5 and 6	Did Not Operate
Chalk Point Unit 2	Did Not Operate
Chalk Point GT2	Did Not Operate
Dickerson Unit 3	Did Not Operate
Vienna 8	Did Not Operate
Perryman CT1, 3 and 4	Did Not Operate
Wheelabrator Unit 3	Did Not Operate
MCRFF Unit 3	Did Not Operate
Westport CT5	Shutdown

**CSPs did not  
dispatch demand  
response customers  
or call for test  
operations**

**- 18 of 29 units did not operate**





# June 9 Operational Data

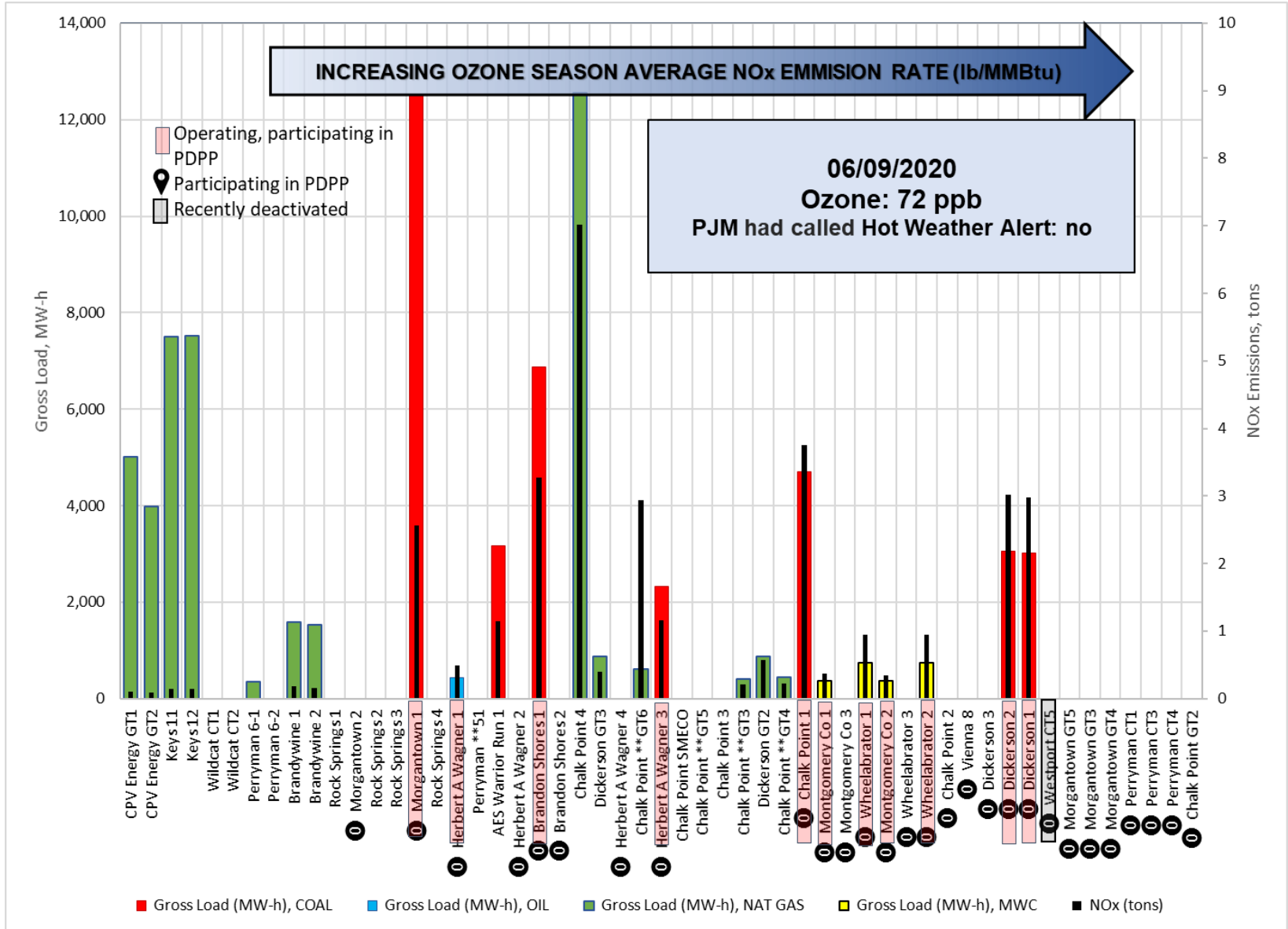
## Units That Ran

Unit	Duration	Rate	Comment
Brandon Unit 1	24 hours	0.09 lb/mmBTU	3.27 tons of NOx – Startup
Wagner Unit 1	24 hours	0.08 lb/mmBTU	0.49 tons of NOx
Wagner Unit 3	19 hours	0.12 lb/mmBTU	1.17 tons of NOx - Startup
Morgantown U1	24 hours	0.04 lb/mmBTU	2.6 tons of NOx
Chalk Point U1	22 hours	0.13 lb/mmBTU	3.8 tons of NOx
Dickerson U1&2	24 hours	0.20 lb/mmBTU	6.0 tons of NOx – combined stack

Unit	Duration	Rate	Comment
Wheelabrator			Facility-wide total:
Unit 1	24 hours	140 ppm	
Unit 2	24 hours	141 ppm	1.88 tons of NOx
MCRFF			Facility-wide total:
Unit 1	24 hours	62 ppm	
Unit 2	24 hours	61 ppm	0.6 tons of NOx



# June 9 - Are the Right Units Running?





# July 18 Operational Data

## Units That Did Not Run

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Unit	Comment
Wagner Units 1, 2 and 4	Did Not Operate
Morgantown GT3, 4, 5 and 6	Did Not Operate
Chalk Point GT2	Did Not Operate
Dickerson Unit 3	Did Not Operate
Vienna 8	Did Not Operate
Perryman CT1, 3 and 4	Did Not Operate
Westport CT5	Shutdown

**- 14 of 29 units did not operate**

**CSPs did not dispatch demand response customers or call for test operations**



# July 18 Operational Data

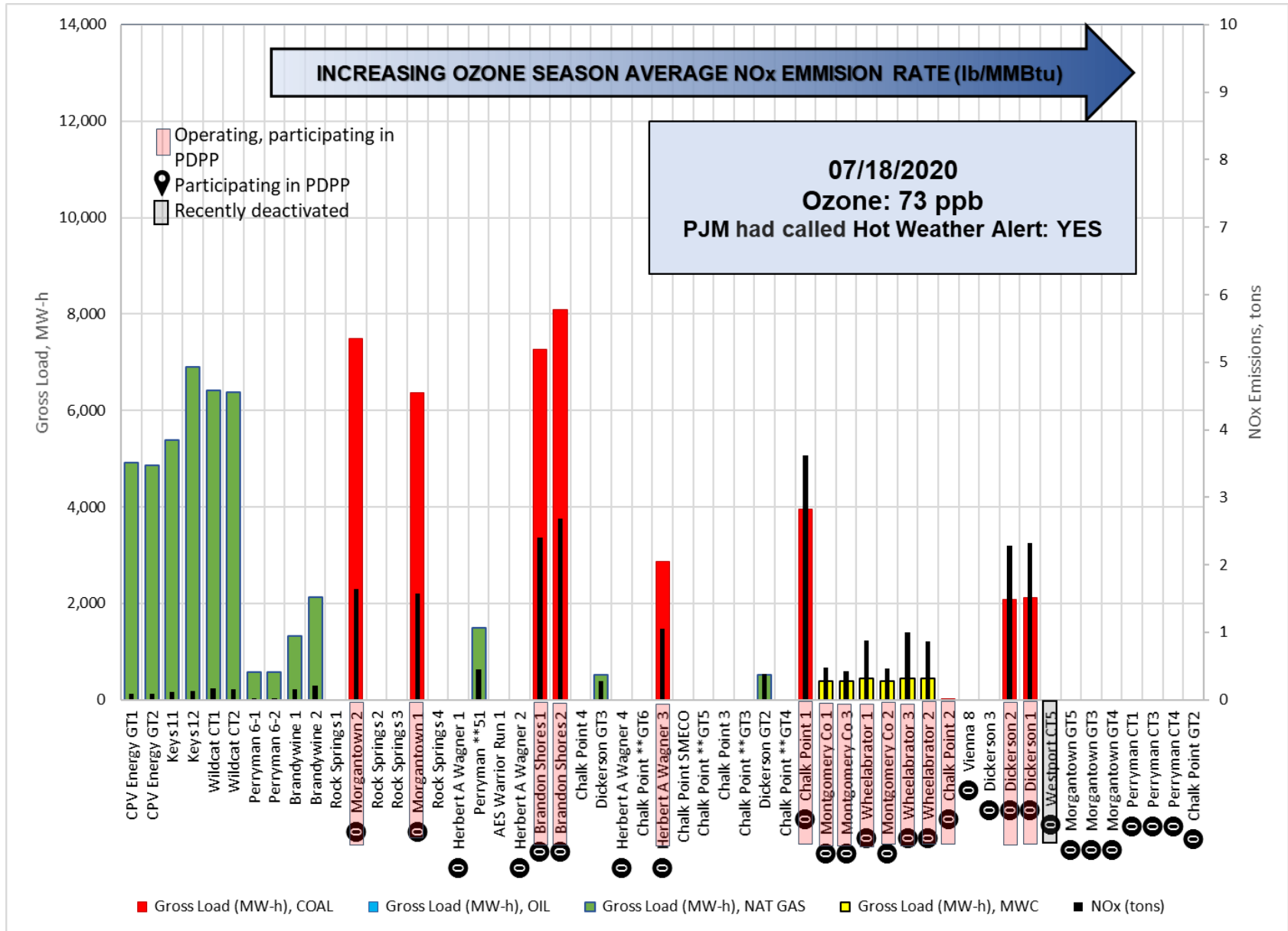
## Units That Ran

Unit	Duration	Rate	Comment
Brandon Unit 1	24 hours	0.06 lb/mmBTU	2.40 tons of NOx – Startup
Brandon Unit 2	24 hours	0.07 lb/mmBTU	2.68 tons of NOx
Wagner Unit 3	24 hours	0.06 lb/mmBTU	1.05 tons of NOx
Morgantown U1	24 hours	0.04 lb/mmBTU	1.6 tons of NOx
Morgantown U2	24 hours	0.04 lb/mmBTU	1.6 tons of NOx
Chalk Point U1&2	24 hours	0.13 lb/mmBTU	3.6 tons Nox–combined/U 2 Startup
Dickerson U1&2	24 hours	0.21 lb/mmBTU	4.6 tons of NOx – combined stack

Unit	Duration	Rate	Comment
Wheelabrator			Facility-wide total:
Unit 1	24 hours	140 ppm	
Unit 2	24 hours	133 ppm	2.73 tons of NOx
Unit 3	24 hours	140 ppm	
MCRFF			Facility-wide total:
Unit 1	24 hours	85 ppm	
Unit 2	24 hours	84 ppm	1.4 tons of NOx
Unit 3	24 hours	76 ppm	



# July 18 - Are the Right Units Running?





# July 27 Operational Data

## Units That Did Not Run

Unit	Comment
Wagner Units 2 and 4	Did Not Operate
Morgantown Unit 1	Did Not Operate
Morgantown GT3, 4, 5 and 6	Did Not Operate
Chalk Point GT2	Did Not Operate
Dickerson Units 1 & 3	Did Not Operate
Vienna 8	Did Not Operate
Perryman CT1, 3 and 4	Did Not Operate
MCRFF Unit 1	Did Not Operate
Westport CT5	Shutdown

**- 16 of 29 units did not operate**

**CSPs did not dispatch demand response customers or call for test operations**



# July 27 Operational Data

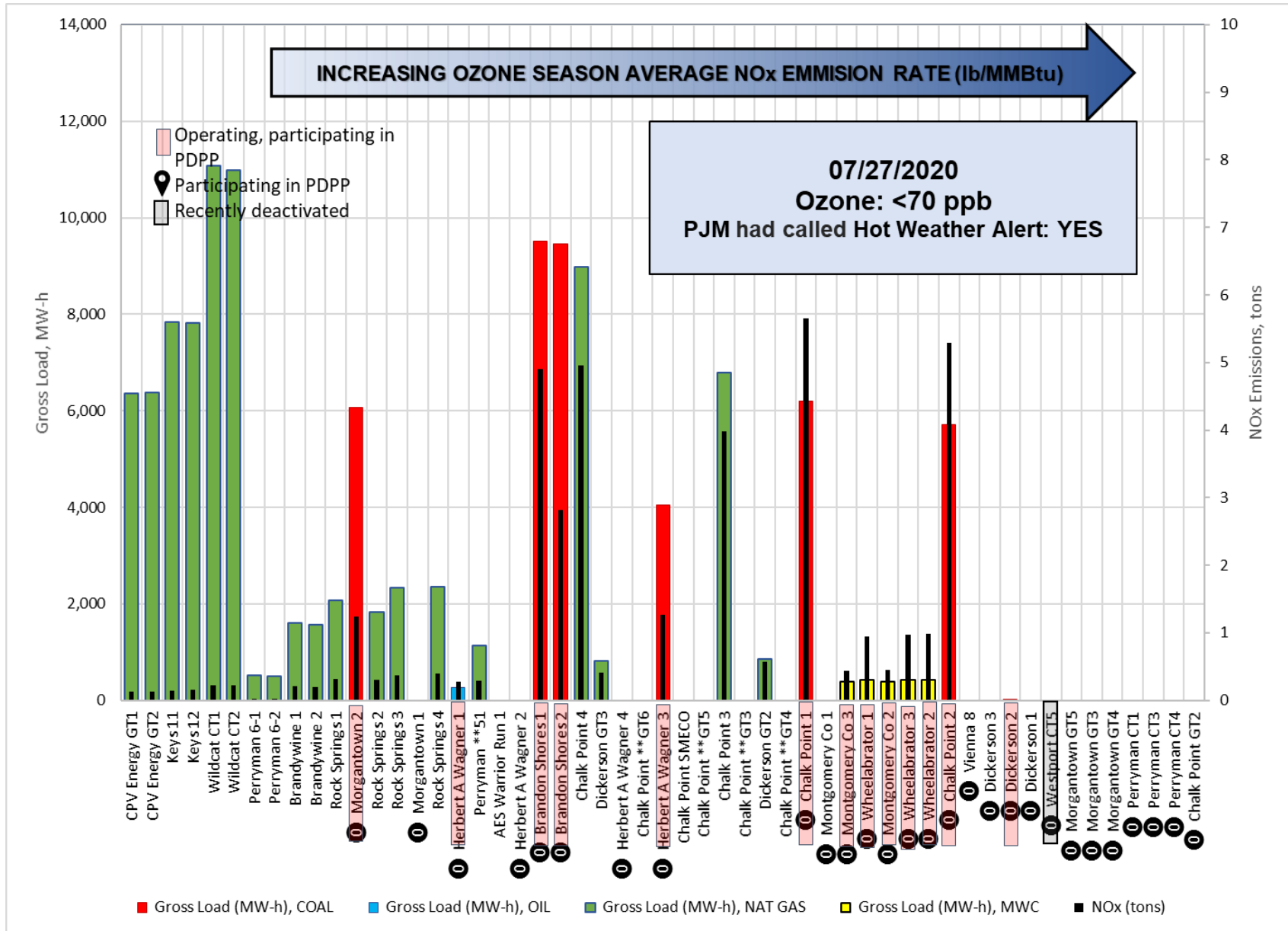
## Units That Ran

Unit	Duration	Rate	Comment
Brandon Unit 1	24 hours	0.12 lb/mmBTU	4.90 tons NOx – Startup/low load
Brandon Unit 2	24 hours	0.06 lb/mmBTU	2.82 tons of NOx
Wagner Unit 1	19 hours	0.07 lb/mmBTU	0.28 tons of NOx – Startup/Shut
Wagner Unit 3	24 hours	0.09 lb/mmBTU	1.27 tons of NOx - Startup
Morgantown U2	24 hours	0.04 lb/mmBTU	1.2 tons of NOx
Chalk Point U1&2	24 hours	0.17 lb/mmBTU	11 tons of NOx - combined
Dickerson Unit 2	2 hours	0.007 lb/mmBTU	0.001 tons of NOx – combined stack

Unit	Duration	Rate	Comment
Wheelabrator			Facility-wide total:
Unit 1	24 hours	144 ppm	2.9 tons of NOx
Unit 2	24 hours	142 ppm	
Unit 3	24 hours	140 ppm	
MCRFF			Facility-wide total:
Unit 2	24 hours	78 ppm	0.8 tons of NOx
Unit 3	24 hours	77 ppm	



# July 27 - Are the Right Units Running?







# July 30 Operational Data

## Units That Did Not Run

Unit	Comment
Wagner Units 1 and 4	Did Not Operate
Morgantown Unit 1	Did Not Operate
Morgantown GT3, 4, 5 and 6	Did Not Operate
Chalk Point Unit 2	Did Not Operate
Chalk Point GT2	Did Not Operate
Dickerson Unit 3	Did Not Operate
Vienna 8	Did Not Operate
Perryman CT1, 3 and 4	Did Not Operate
MCRFF Unit 1	Did Not Operate
Westport CT5	Shutdown

**- 16 of 29 units did not operate**

**CSPs did not dispatch demand response customers or call for test operations**



# July 30 Operational Data

## Units That Ran

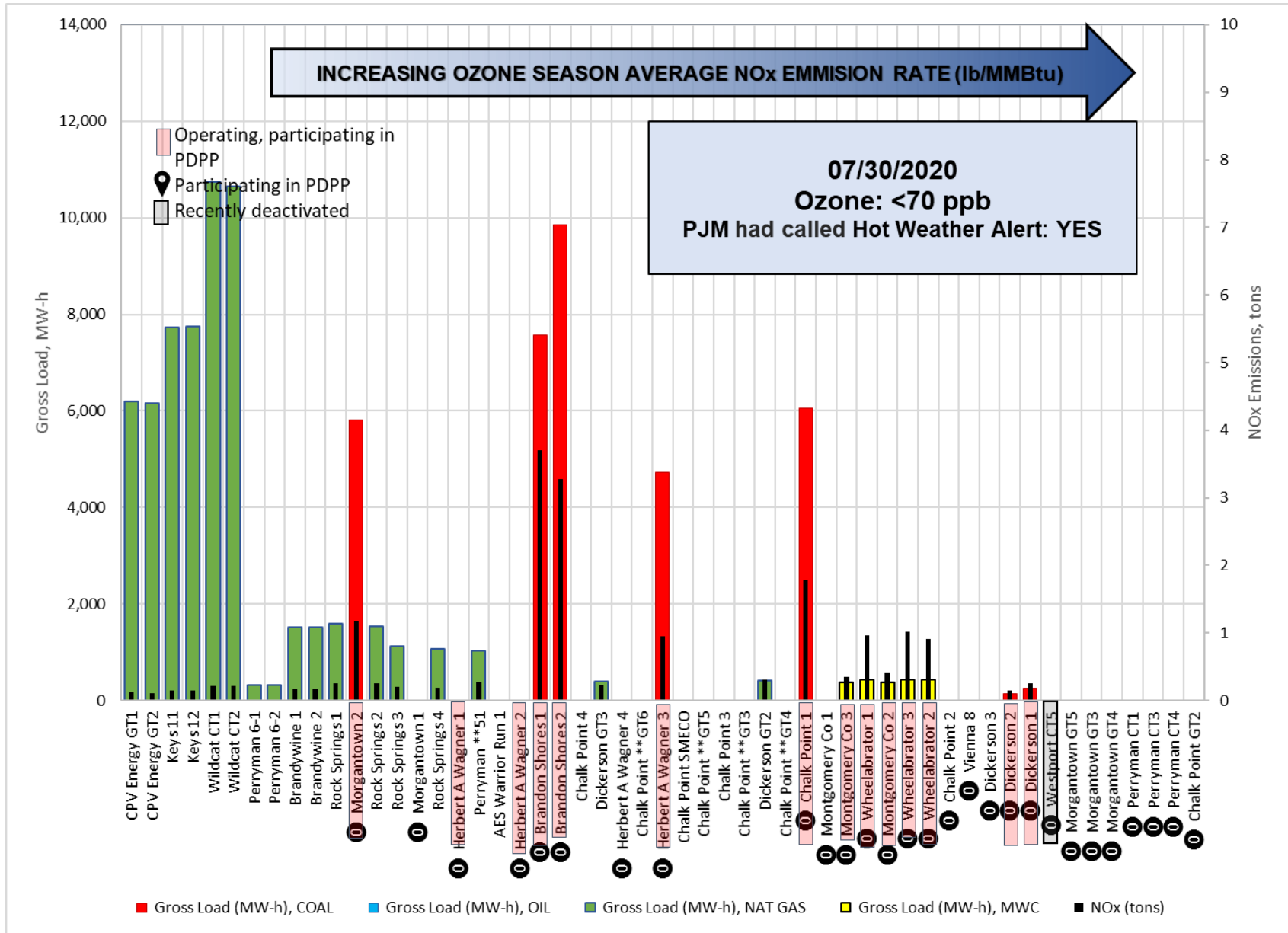
Unit	Duration	Rate	Comment
Brandon Unit 1	24 hours	0.10 lb/mmBTU	3.70 tons of NOx - Shutdown
Brandon Unit 2	24 hours	0.07 lb/mmBTU	3.28 tons of NOx
Wagner Unit 2	12 hours	0.03 lb/mmBTU	0.01 tons of NOx – ran on NG
Wagner Unit 3	20 hours	0.05 lb/mmBTU	0.96 tons of NOx - Shutdown
Morgantown U2*	24 hours	0.04 lb/mmBTU	1.2 tons of NOx
Chalk Point U1	23 hours	0.06 lb/mmBTU	1.8 tons of NOx
Dickerson U1&2	5 hours	0.21 lb/mmBTU	0.4 tons of NOx – combined stack

\* Morgantown Units 1 and 2 postponed scheduled Capacity Test

Unit	Duration	Rate	Comment
Wheelabrator			Facility-wide total:
Unit 1	24 hours	141 ppm	2.89 tons of NOx
Unit 2	24 hours	141 ppm	
Unit 3	24 hours	139 ppm	
MCRFF			Facility-wide total:
Unit 2	24 hours	70 ppm	0.7 tons of NOx
Unit 3	24 hours	60 ppm	



# July 30 - Are the Right Units Running?





# August 10 Operational Data

## Units That Did Not Run

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Unit	Comment
Wagner Units 2 and 4	Did Not Operate
Morgantown GT3, 4, 5 and 6	Did Not Operate
Chalk Point Units 1 and 2	Did Not Operate
Chalk Point GT2	Did Not Operate
Dickerson Units 1, 2 and 3	Did Not Operate
Vienna 8	Did Not Operate
Westport CT5	Shutdown

**- 14 of 29 units did not operate**

**CSPs did not dispatch demand response customers or call for test operations**



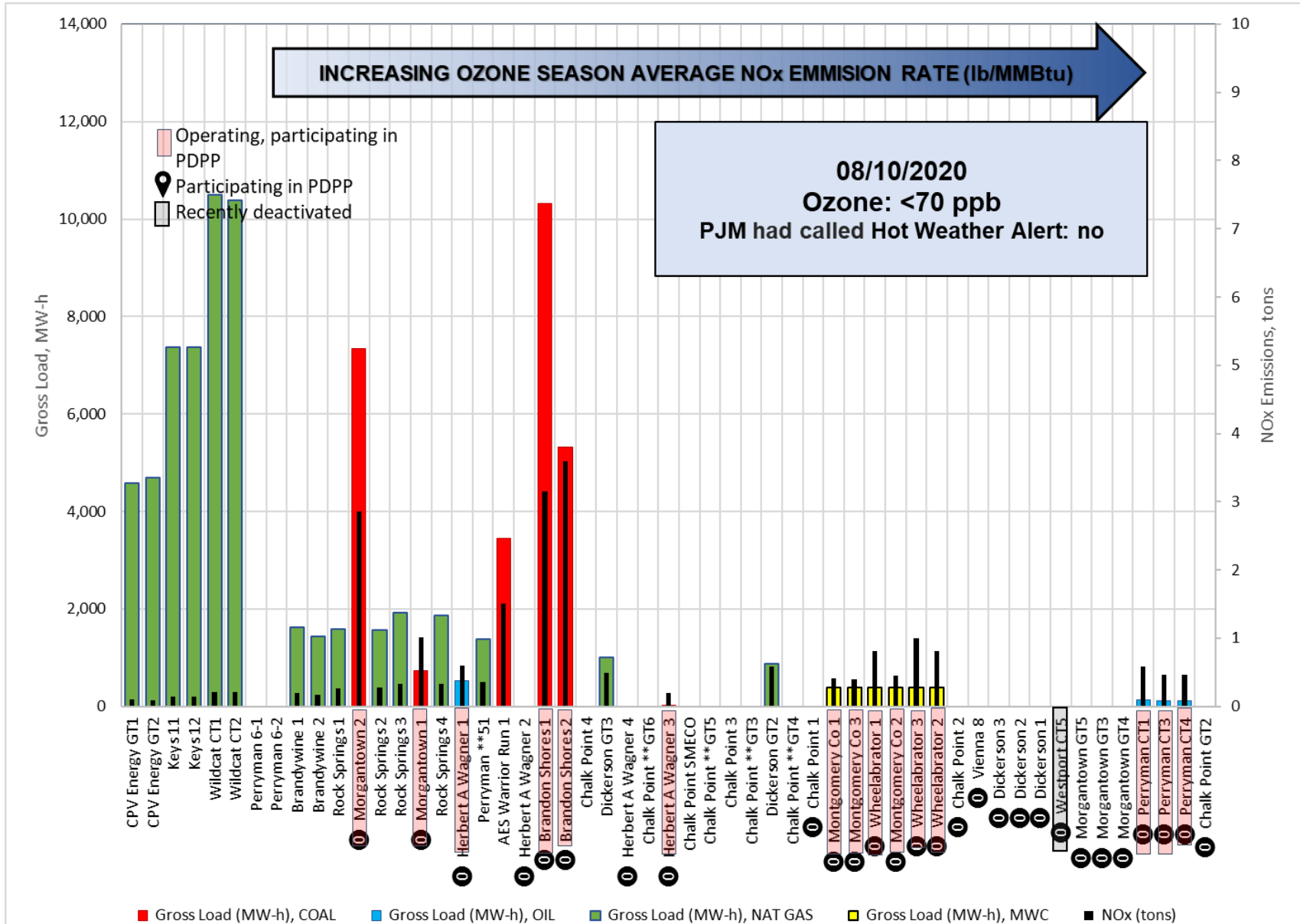
# August 10 Operational Data

## Units That Ran

Unit	Duration	Rate	Comment
Brandon Unit 1	24 hours	0.06 lb/mmBTU	3.15 tons of NOx
Brandon Unit 2	24 hours	0.12 lb/mmBTU	3.61 tons of NOx - Startup
Wagner Unit 1	17 hours	0.09 lb/mmBTU	0.6 tons of NOx - Startup
Wagner Unit 3	10 hours	0.12 lb/mmBTU	0.20 tons of NOx - Startup
Morgantown U1	14 hours	0.17 lb/mmBTU	1.0 tons of NOx - Startup
Morgantown U2	24 hours	0.08 lb/mmBTU	2.9 tons of NOx - Startup
Perryman CT1	4 hours	0.58 lb/mmBTU	0.58 tons of NOx
Perryman CT3	4 hours	0.48 lb/mmBTU	0.47 tons of NOx
Perryman CT4	4 hours	0.47 lb/mmBTU	0.46 tons of NOx
Unit	Duration	Rate	Comment
Wheelabrator			Facility-wide total:
Unit 1	24 hours	144 ppm	
Unit 2	24 hours	143 ppm	2.63 tons of NOx
Unit 3	24 hours	143 ppm	
MCRFF			Facility-wide total:
Unit 1	24 hours	70 ppm	
Unit 2	24 hours	82 ppm	1.3 tons of NOx
Unit 3	24 hours	81 ppm	



# August 10 - Are the Right Units Running?



A bright sun is positioned in the upper right quadrant of the image, casting a strong glow and creating a lens flare effect. The sky is a deep, clear blue, and several large, fluffy white cumulus clouds are scattered across the upper half of the frame. The lower half of the image is a solid, uniform blue color.

# SUMMARY



# 2021 – A Pivotal Year

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- The Washington Region is very close to attaining the ozone standard
  - Downward ozone trends and the historic low number of days in 2020 bring the area within grasp of achieving healthy air
  - Peak Day efforts have been, and will continue to be, crucial
  - Our science shows the importance of Peak Day efforts having a significant impact on shaving the peaks
- 2021 may be the most important year for the Peak Day effort
  - Attainment may partially hinge upon Partners taking actions
- Transition to cleaner fuels and regional efforts will also help
- Greater focus on mobile sources and increased EV usage will result in long-term progress





# Is the Potential Peak Day Regulation Still an Option in MD?

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- It is ... but the potential regulation is linked to voluntary action in 2021. Efforts in 2017 through 2020 have been reasonable.
- If needed, it would be a simple regulation:
  - Target units with large emissions and high rates
  - Limit the units that can run on any day when air quality is forecast to be code yellow, orange, red or purple
  - Only units with a rate less than 0.09 LB/MMBtu (or equivalent) would be allowed to run on those days
  - Could include similar prohibitions for Curtailment Service Providers for instructions, notices and testing
  - The potential regulation will include provisions to ensure that true energy emergencies are avoided
- If voluntary action in 2021 is adequate ... the regulation will remain “on hold”

# *Questions ... Comments ... Discussion*

