

2015 Ozone NAAQS Redesignation Request & Maintenance Plan

The draft ozone design value for the Washington, DC-MD-VA 2015 ozone NAAQS nonattainment area is 0.071 ppm. However, after EPA's granting of the Exceptional Events Waiver to the District for the McMillan monitor's ozone data for June 29, 2023, in a letter (dt. July 17, 2024), it comes down to 0.070 ppm enabling the region to attain the 2015 ozone NAAQS.

Having attained the above NAAQS, the Washington region is currently planning to submit a Redesignation Request & Maintenance Plan (RR/MP). In this respect, the region asked a few questions to EPA related to the requirements for redesignation of the area to attainment and related milestone year and emissions inventories.

List of Questions for EPA

1. Question related to Redesignation Requirements

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 they can submit RR/MP?

2. Questions related to Milestone Years & Emissions Inventories

(i) Base Year – The region's base year 2017 emissions inventory was approved by EPA in 2022.

Question 1 – Would the region need to update the onroad and nonroad portions of the 2017 BY inventory using MOVES4.0.1 (currently approved model) or do those emissions inventories developed and submitted using MOVES2014b (EPA approved model at that time) meet the requirements for the 2017 BY emission inventories for the proposed RR/MP?

Question 2 – Can the current approved emissions model (MOVES4.0.1) be used instead of MOVES5 (publication expected by the end of 2024)? MOVES5 will take considerable time to implement and MOVES4.0.1 emission estimates are expected to be somewhat higher than MOVES5 estimates so the use of MOVES4.0.1 in the maintenance demonstration for years 2032 and 2038 should be conservative/more stringent.

(ii) Attainment Year – Can 2022 be used as an attainment year? It is in the middle of the three-year period (2021-2023) of the air quality data, which shows attainment, but it is not a periodic emissions inventory year. The more recent periodic inventory was submitted for 2020, which does not seem to be a typical inventory given the pandemic induced emissions decline. The next periodic inventory year is 2023, but that won't be published until March 2026. EPA is currently in the advanced stage in the development of the 2022 modeling inventory. Therefore, the use of 2022 makes sense.

(iii) Interim & Maintenance Year – The maintenance of the attainment status in the future

Question – Is 2032 acceptable as the interim year and 2038 as the maintenance year? 2038 seems a good choice for the maintenance year as it is about 12 years apart from the expected late 2026 timeframe of the submission (minimum 10 years required after EPA approval). Second, the year 2032 lies close to the middle of 2022 and 2038. Third, 2032 and 2038 are part of the 2022 emissions modeling platform.

Therefore, parts of the inventories required for those two years will be available from EPA and this will help the region develop the plan relatively quickly.

3. Question related to Emission Reduction Credits for retired power plants

Morgantown, Chalk Point and Dickerson power plants shut down and are considering applying for Emission Reduction Credits (ERCs). How are ERCs accounted for in the Redesignation Request & Maintenance Plan emissions inventory?

