

# Final 2020 Ozone Exceptional Events Analysis for the District of Columbia

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MWAQC-TAC

October 12, 2021



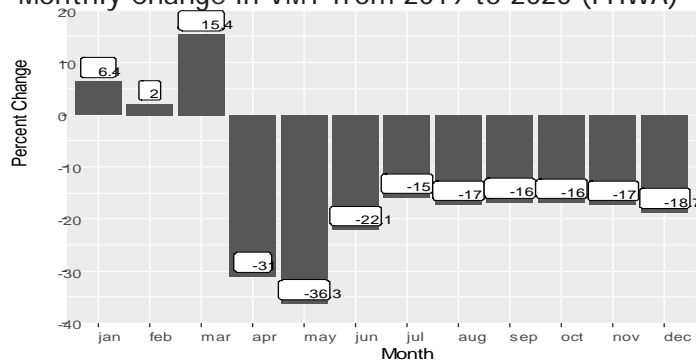
# Covid-19 Health Emergency Exceptional Event

- District has been consistently measuring above the ozone NAAQS for several years
- In 2020 the District saw:
  - 77% decrease in congestion
  - 21% decrease in nitrogen dioxide (NO<sub>2</sub>)
  - 7% decrease in O<sub>3</sub>
- DOEE is considering the ozone values from Mar 16 To Dec 31 to be the result of “unusual traffic congestion”
- DOEE published its proposed demonstration for public comment on August 20, 2021 (no comments were received):  
<https://dcregs.dc.gov/Common/NoticeDetail.aspx?NoticeId=N1123>

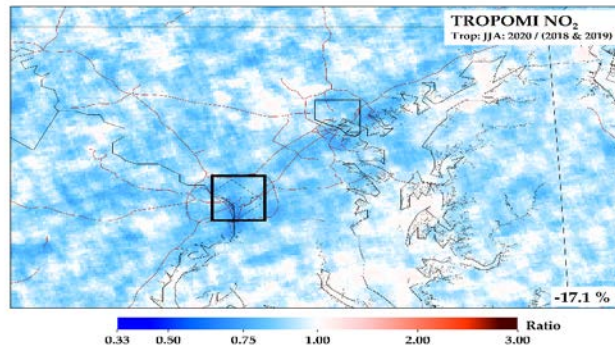
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# Exceptional Event – Data Story

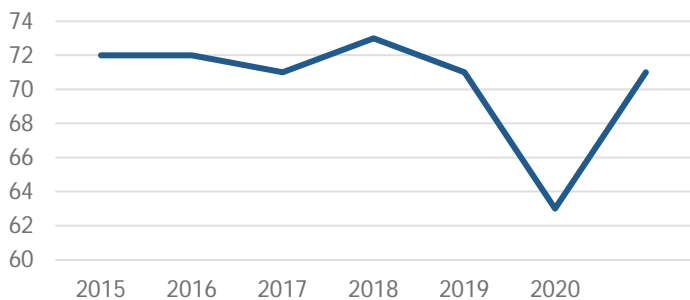
Monthly Change in VMT from 2019 to 2020 (FHWA)



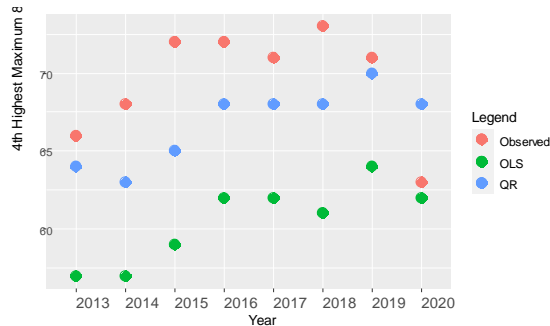
Observed change in regional NO<sub>2</sub> (TROPOMI) (Dan Goldberg, PhD)



Monitored 4<sup>th</sup> High 8-hr Ozone from 2015 to 2020 at McMillian



Forecasted 4<sup>th</sup> High 8-hr Ozone from 2013 to 2020 at McMillian



# Exceptional Event – Why?

- EPA evaluates compliance with NAAQS based on three-year average
- 2020 pulls down our average well below the NAAQS
- 2021 ozone levels have returning to pre-pandemic violating levels
- Concern that Washington, DC-MD-VA will be complying “on paper,” but air quality problems will persist, and will lose many tools to improve the air

# Regressions - Tools

- Literature review suggested three tools to explore:
  - Ordinary Least Squares Regressions (OLS)
  - Quantile Regressions (QR)
  - Machine Learning Algorithms
- Built using 2013-2017 data, tested on 2018 & 2019 data
- Explored the first two since MLA ran up against resource constraints

## Ordinary Least Squares (OLS)

- Simple model used to estimate a relationship of two variables using a linear relationship
- Aims to estimate the mean of a distribution

## Quantile Regression (QR)

- Allows for examination of entire distribution (many quantiles).
- Allows for explaining outliers.

# Regression Formula

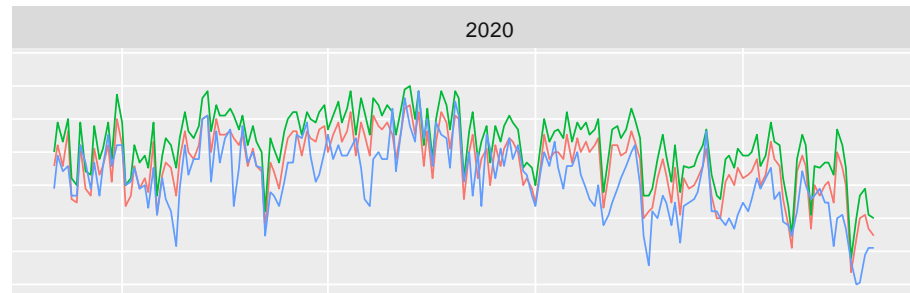
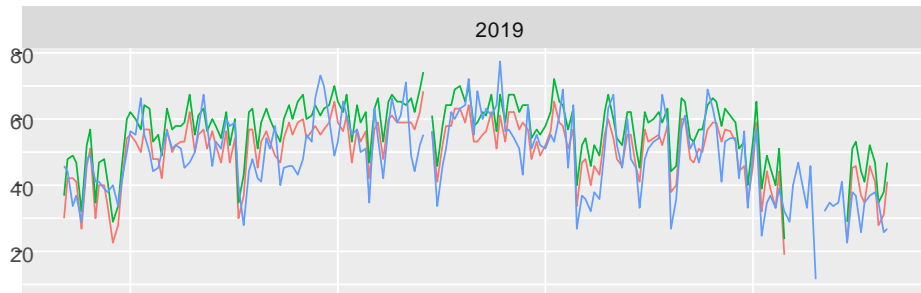
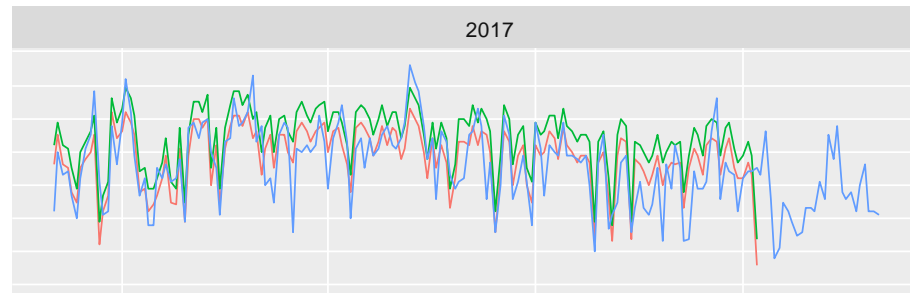
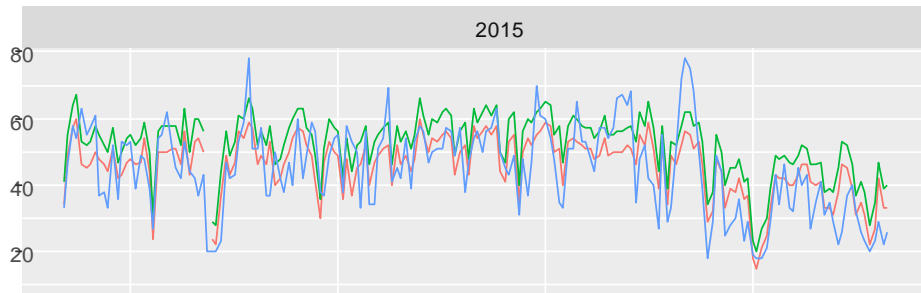
$$\begin{aligned} \text{Ozone} = & \alpha + \\ & \beta_1 * \text{Pressure.Measurement} + \\ & \beta_2 * \text{Temp.Measurement} + \\ & \beta_3 * \text{DayBeforeMaxDailyTemp} + \\ & \beta_4 * \text{TwoDaysBeforeMaxDailyTemp} + \\ & \beta_5 * \text{Humidity.Measurement} + \\ & \beta_6 * \text{Windspeed.Measurement} + \\ & \beta_{7-13} * \text{Wind.Direction.Factor} + \\ & \beta_{14} * \text{GHI.Measurement} \\ & \beta_{15} * \text{Year} \\ & \beta_{16-38} * \text{HourOfDay.Factor} + \\ & \beta_{39-44} * \text{DayOfWeek.Factor} + \\ & \beta_{45} * \text{RainedDayBefore?} + \\ & \beta_{46} * \text{Geopotential.Height.Interpolated.Measurement} + \\ & \beta_{47} * \text{Windspeed.850mb.Interpolated.Measurement} + \\ & \beta_{48-55} * \text{Wind.850mb.Direction.Interpolated.Factor} + \\ & \epsilon \end{aligned}$$

\* This equation is for OLS, QR has 40 of these.

# Measured vs. Estimated

Maximum Daily 8-hour Ozone (ppb)

Values Est. (OLS) Est. (QR) Measured



Jul

Oct

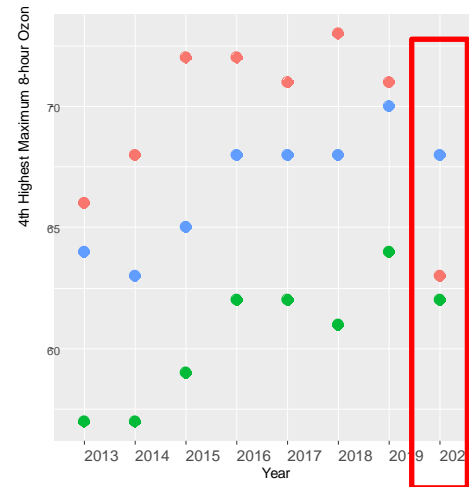
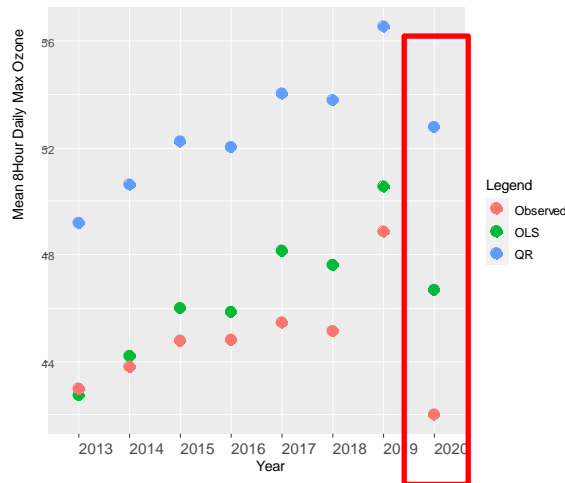
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Date

# Comparison to Ozone Metrics

- QR over-predicts average daily max ozone and OLS predicts very well, but 2020 the tools don't function well
- 2013-2019, 4<sup>th</sup> highs under-predicted by 3.86 (QR) and 10.1 (OLS) ppb on average
- In 2020:
  - QR tool over-predicted the 4<sup>th</sup> high 8-hour ozone by 5 ppb
  - OLS tool under-predicted ozone by only 1 ppb
  - Swings of 8.86 and 9.1 ppb, respectively





# Legal Justification (CAA § 319(b))

<i>(A)(i) affects air quality;</i>	DOEE clearly demonstrated the impact on air quality
<i>(ii) is not reasonably controllable or preventable;</i>	Covid-19 was not controllable nor preventable and the thus subsequent (positive) emissions changes were neither
<i>(iii) is an event caused by human activity that is unlikely to recur at a particular location or a natural event;</i>	Covid-19 was natural in origin and unlikely to recur
<i>(iv) is determined by the <u>Administrator</u> through the process established in the regulations promulgated under paragraph (2) to be an <u>exceptional event</u>.</i>	<ol style="list-style-type: none"><li>1. DOEE makes the case that the Rule unnecessarily limits the rule to only exceedances based on the lack of evidence of that intent in the CAA or the Congressional record</li><li>2. DOEE demonstrates that this event meets the portions of the rule not explicitly geared towards exceedances</li></ol>
<i>(B) Exclusions In this subsection, the term "<u>exceptional event</u>" does not include— <i>(i) stagnation of air masses or meteorological inversions;</i> <i>(ii) a meteorological event involving high temperatures or lack of precipitation; or</i> <i>(iii) air pollution <u>relating to</u> source noncompliance.</i></i>	Does not meet any of the specific exclusions in the Clean Air Act

# Conclusions

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- 2020 ozone levels were extraordinary
- Successfully demonstrated the relationship between meteorological conditions and ground-level Ozone
- OLS and QR are useful tools to use in tandem to predict Ozone in the District
- QR model was more efficient for forecasting hourly Ozone near the peaks
- Clean Air Act reading points towards DOEE's request being acceptable
- Full Papers are available:
  - Exceptional Event Package (demonstration and regression analysis paper):  
<https://doee.dc.gov/service/exceptional-event-demonstration-2020-ozone-levels>

# Wrapup

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- Thanks

- Dr. Courtney Grimes (DOEE)
- Dr. Rama Tangirala (DOEE)
- Joel Dreessen (MDE)
- Tom Downs (Maine DEP)
- Drs. Dan Goldberg and Gaige Kerr (GWU)
- Bob Day (DOEE)

- Questions

- Joseph Jakuta  
Joseph.jakuta@dc.gov

# Sources

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