

Attachment 8A

Low Capacity & Daily Average Relationship

Explaining the data in Attachment 8B

DEP evaluated daily average emissions based upon Maryland's assertion that there were excess EGU emissions available for reduction. DEP evaluated daily averages at EGUs in Pennsylvania during the 2017 and 2018 ozone season when such daily emission averages exceeded 0.12 Lbs. of NO_x per MMBtu of heat input. This is the RACT II standard for all Pennsylvania coal fired power plants when the SCR reaches a temperature of 600 Degrees Fahrenheit or at about 60% of a unit's operating capacity. The daily emission average emissions for Pennsylvania units during the exceedance days identified by Maryland met the 0.12 pounds of NO_x per MMBtu control limit in all cases except when the units were operating under 60% capacity, during startups, or when they were transitioning through the 60%-rated capacity threshold as related to temperatures. The higher emission rates are allowed under RACT II when units are not operating at temperature.

The graphs and data in Attachment 8B show the capacity and average emissions rate relationship.