



TECHNICAL SUPPORT DOCUMENT

Amendments to COMAR 26.11.27 Emission Limitations for Power Plants

Purpose of the Amendments

The purpose of this action is to reinstate the original annual and ozone season emission limits for NO_x and annual emission limits for SO₂ for R. Paul Smith Power Station electric generating units as established under COMAR 26.11.27 – *Emission Limitations for Power Plants* adopted permanently effective July 16, 2007. This action is in response to a request by R. Paul Smith to the Maryland Department of the Environment (MDE) to retain its Title V permit although the power plant has ceased operations as of September 1, 2012.

Submission to EPA as Revision to Maryland's SIP (or 111(d) Plan, or Title V Program)

This action will be submitted to the U.S. Environmental Protection Agency (EPA) for approval as part of Maryland's State Implementation Plan.

Background

Under the Healthy Air Act (HAA) which is codified as COMAR 26.11.27 – *Emission Limitations for Power Plants*, R. Paul Smith units 3 and 4 are defined as an affected facility subject to the requirements of § 2-1003(c), Annotated Code of Maryland. The exception provisions of the HAA authorize the Department to allow the R. Paul Smith facility, units 3 and 4, to operate without complying with the emissions requirements of the HAA if PJM Interconnection, Inc. (PJM Inc.) determines that the termination of operation of the facility will adversely affect the reliability of electrical service in the PJM region. PJM Inc. conducted an evaluation in 2006 and determined that R. Paul Smith is needed to maintain reliability.

The HAA also requires that if R. Paul Smith units 3 and 4 are allowed to operate without complying with the emissions requirements then the following conditions must be met: “(1) The facility may not operate at emissions levels greater than the highest level measured at the facility during the calendar years 2000 through 2004; and (2) The Department upon review of the operations of the facility shall adopt regulations to establish an alternative emissions requirement for the facility.”

The Department consequently made amendments to the HAA, which on September 7, 2009 became effective. The Department continued to monitor the necessity to maintain the R. Paul Smith facility and formally contacted PJM Inc. to request a reevaluation of the plant on March 14, 2011. The Department maintained the position to revise the regulations, if needed, based on PJM's reevaluation and the Department's findings.

On September 1, 2012, R. Paul Smith units 3 and 4 formally ceased operations though the power plant wishes to retain its Title V permit. The Department, therefore, is reestablishing the

emission limits of the original HAA for R. Paul Smith units 3 and 4 and should the units ever come back online they would be required to meet the more stringent emission standards.

Affected Sources

The R. Paul Smith facility is the only source affected by the amendments. R. Paul Smith Electric Power Generation Station is owned and operated by the FirstEnergy Corporation which has ceased the operations of the power plant as of September 2012. The facility, located in Washington County, Maryland operated two coal-fired boilers (unit 3 and unit 4).

Requirements

The proposed amendments will reinstate the following annual and ozone NO_x and annual SO₂ emission limits for R. Paul Smith, effective September 1, 2012:

1. An annual emission limit of 55 tons of NO_x for unit 3 and 288 tons of NO_x for unit 4;
2. An ozone season emission limit of 22 tons of NO_x for unit 3 and 118 tons of NO_x for unit 4;
and
3. An annual emission limit of 124 tons of SO₂ for unit 3 and 644 tons of SO₂ for unit 4

Expected Emissions Reductions

The proposed action provides no emission reductions. However, should the R. Paul Smith facility re-open then units 3 and 4 would be subject to stricter emission standards.

Comparison to Federal Standards

There is no corresponding federal standard to this proposed action.

Economic Impact on Affected Sources, the Department, other State Agencies, Local Government, other Industries or Trade Groups, the Public

The proposed action has no economic impact.

Economic Impact on Small Businesses

The affected source does not fit the definition of a “small business.”