



August 29, 2018

The Honorable James Richard Perry  
Secretary of the Energy  
United States Department of Energy  
1000 Independence Ave, SW  
Washington, DC 20585

**Re: Report on Yorktown Units 1 & 2 Operations Pursuant to Order No. 202-18-4**

Dear Secretary Perry:

Pursuant to Order No. 202-18-4 issued June 8, 2018 (“Order”) by the Secretary of Energy (“Secretary”), PJM Interconnection, L.L.C. (“PJM”) and Virginia Electric and Power Company (“Dominion Energy Virginia”) respectfully submit the attached air emissions report and water usage report regarding PJM’s dispatch of Yorktown Units 1 and 2 from August 14 through August 27, including the periods needed to startup and ramp down the units. This report is submitted in accordance with the Secretary’s directive in the Order that every two weeks PJM and Dominion are to “report all dates between June 12, 2018 and September 9, 2018, on which Yorktown Units 1 and/or 2 are operated, and the associated air emissions and water usage data for those dates.”<sup>1</sup>

In the Order, the Secretary determined “that an emergency continues to exist in the North Hampton Roads area of Virginia due to a shortage of electric energy and a shortage of facilities for the generation of electric energy.”<sup>2</sup> The Secretary also found that the issuance of the orders will meet the emergency and serve the public interest as required by Federal Power Act Section 202(c).<sup>3</sup> In doing so, the Secretary directed Dominion Energy Virginia to operate Yorktown Units 1 and/or 2 as directed by PJM only as needed to ensure grid reliability for a 90-day period of June 12 through September 9, 2018.<sup>4</sup>

---

<sup>1</sup> Order at page 2.  
<sup>2</sup> Order at page 1.  
<sup>3</sup> *Id.*  
<sup>4</sup> Order at page 2.

Regarding PJM's dispatch of the Yorktown Units 1 and 2 for the period August 14 through August 27, Unit 1 experienced a test run and Unit 2 was dispatched three times. These are the only instances in which the units ran during the reporting period.

Attachment 1 to this report is the Yorktown Power Station Bi-Weekly Mass Emissions for August 14 through August 27 that shows the actual runtime and air emissions data for Unit 2 (Unit 1 did not operate during this reporting period). This spreadsheet includes hourly runtime data for Yorktown Unit 2, hourly gross Megawatt (MW) outputs, and raw and calculated data showing air emissions data associated with operations of Yorktown Unit 2.<sup>5</sup>

The information in Attachment 1 reports Yorktown Unit 2 hourly emissions of PM-10 and SO<sub>2</sub> in pounds per hour, and mercury in pounds per hour, for the operating period beginning August 14 through August 27, 2018. Additionally for the same time period, Attachment 1 provides Unit 2 hourly emissions of NO<sub>x</sub> in pounds per hour, greenhouse gases (as CO<sub>2</sub>) in tons per hour, lead in pounds per hour, HCl in pounds per hour, HF in pounds per hour, and CO in pounds per hour. NO<sub>x</sub> and SO<sub>2</sub> emissions are based on valid hours of Continuous Emissions Monitoring System (CEMS) data for the period. PM-10 emissions are based on the emission factor derived from the July 21, 2017 stack test (0.0168 lbs/mmBtu corrected to 0.1143 lbs/mmBtu calculated for PM-10 filterable plus condensable). CO<sub>2</sub> emissions are based on valid CEMS hours for the operating period. All other emissions were calculated using emission factors from AP-42, Fifth Edition, Volume 1, Chapter 1: External Combustion Sources and calculated hourly coal consumption in tons.<sup>6</sup>

Attachment 2 to this report is the Yorktown Unit 2 August 14 through August 27 Circulating Water Usage report for the unit operations required by the Order. Operation of cooling water pumps

---

<sup>5</sup> The Yorktown units can emit pollution while not generating MWs (*e.g.* during standby, startup and shutdown sequences). Thus, Attachment 1 shows the MW output during the period Yorktown Unit 2 provided power to the grid including startup and shutdown processes and it shows the emissions data for operations of Unit 2 including times when the unit was not generating power.

<sup>6</sup> Mercury and lead emissions were calculated using AP-42, Table 1.1-18. CO emissions were calculated using emission factors from AP-42, Table 1.1-3. Total HAP metals and individual HAP metals are not provided because MATS Table 2 (40 CFR 63, Subpart UUUUU) provides for compliance with either the PM limit or total non-mercury HAP metals limits or individual HAP metals. Dominion Energy Virginia is providing PM-10 emissions for the purposes of MATS. HCl and HF emissions were calculated using emission factors from AP-42, Table 1.1-15.

extends over a period of time longer than unit operation to facilitate cooling of plant components that support the boiler and turbine. As a general rule cooling water will start to be pumped before the unit is started and continue to be pumped until the turbine metal temperature is less than 300 °F. Sometimes additional cooling water is necessary to complete proper cool down of auxiliary equipment and lubrication fluids after the turbine metal reaches 300 °F, as was the case with the Yorktown Unit 2 during the reporting period. As shown in Attachment 2, water circulated through Unit 1's cooling water pumps to balance thermal discharge from Unit 2 and all of these cooling water pumps continued to operate after the reporting period.

PJM and Dominion Energy Virginia respectfully submits the information in this report be accepted by the Secretary as compliant with the Secretary's directive in the Order that every two weeks PJM and Dominion are to report all dates between June 12, 2018 and September 9, 2018, on which Yorktown Units 1 and/or 2 are operated, and the associated air emissions and water usage data for those dates.

Respectfully submitted,

/s/Cheri M. Yochelson

Cheri M. Yochelson  
Senior Counsel  
Dominion Energy Services, Inc.  
120 Tredegar Street, RS-2  
Richmond, Virginia 23219  
Phone: (804) 819-2691  
Email: [cheri.m.yochelson@dominionenergy.com](mailto:cheri.m.yochelson@dominionenergy.com)

Steven R. Pincus  
Associate General Counsel  
PJM Interconnection, L.L.C.  
955 Jefferson Avenue  
Valley Forge Corporate Center  
Norristown, PA 19403-2497  
Phone: 610-666-4370  
Email: [pincus@pjm.com](mailto:pincus@pjm.com)

cc: Pat Hoffman, U.S. Department of Energy  
Catherine Jereza, U.S. Department of Energy  
Rakesh Batra, U.S. Department of Energy  
Casey Roberts, Sierra Club Environmental Law Program