Dominion Energy Services, Inc. Law Department 120 Tredegar Street, Richmond, VA 23219 DominionEnergy.com



November 21, 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. 202-18-5

Dear Secretary Perry:

Pursuant to Order No. 202-18-5 dated September 5, 2016 ("Order") by the Secretary of Energy ("Secretary"), PJM Interconnection, L.L.C. ("PJM") and Virginia Electric and Power Company ("Dominion") respectfully submit the attached air emissions report and water usage report regarding PJM's dispatch of Yorktown Units 1 and 2 from November 6 to 19, 2018, including the periods needed to startup and ramp down the units. This report is submitted in accordance with the Secretary's directive in the directive in the Order that every two weeks PJM and Dominion are to "report all dates between September 10, 2018 and December 8, 2018, on which Yorktown Units 1 and/or 2 are operated, and the associated air emissions and water usage data for those dates."

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." The Secretary also found that the issuance of the order will meet the emergency and serves the public interest as required by Federal Power Act Section 202(c). In doing so, the Secretary directed Dominion 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 September 10 through December 8, 2018.⁴

As shown in the November 7 report regarding PJM's dispatch of the Yorktown Units 1 and 2 for the reporting period October 23 to November 5, Yorktown Unit 2 was dispatched by PJM on November 5

Order at page 2.

Order at page 1.

 $^{^{3}}$ Id

Order at page 2.

to be online 0600 hours on November 6. Cooling water pumps for Unit 2 were started on November 5. The unit was still in start-up mode at the end of the reporting period for the November 7 report and came on line on November 6 at approximately 600 hours. At approximately 1800 hours on November 6, PJM informed Dominion that the unit would be released to come off line at 2400 hours, and the unit came off line at approximately 100 hours on November 7. Unit 1 was not dispatched and did not run during the reporting period.

Attachment 1 to this report is the Yorktown Power Station Bi-Weekly Mass Emissions for November 6 to 19 that shows the actual runtime and air emissions data for Units 1 and 2. This spreadsheet includes hourly runtime data for Yorktown Units 1 and 2, hourly gross Megawatt (MW) outputs, and raw and calculated data showing air emissions data associated with operations of Yorktown Units 1 and 2.5

The information in Attachment 1 reports Yorktown Units 1 and 2 hourly emissions of PM-10 and SO2 in pounds per hour, and mercury in pounds per hour, for the reporting period. Additionally, Attachment 1 provides Units 1 and 2 hourly emissions of NOx in pounds per hour, greenhouse gases (as CO2) 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. NOx and SO2 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). CO2 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. ⁶

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 Units 1 and 2 provided power to the grid including startup and shutdown processes, and it shows the emissions data for operations of Units 1 and 2 including times when the unit was not generating power.

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 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.

Attachment 2 to this report is the Yorktown Units 1 and 2 November 7 to 19 Circulating Water Usage report for unit operations as required by the Order. Operation of cooling water pumps 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 operations of the Yorktown Units for this reporting period.

PJM and Dominion respectfully submit the information in this report be accepted by the Secretary as compliant with the Secretary's directives in the Order that every two weeks PJM and Dominion are to report all dates on which Yorktown Units 1 and/or 2 are operated for the period November 7 to 19, and the associated air emissions and water usage data for those dates.

Respectfully submitted,

<u>/s/Michael C. Regulinski</u>

Michael C. Regulinski Managing General Counsel Dominion Energy Services, Inc. 120 Tredegar Street, RS-2 Richmond, Virginia 23219

Phone: (804) 819-2794

Email: michael.regulinski@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 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