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October 20, 2008

The Honorable Alan J. Steinberg  
Regional Administrator  
United States Environmental Protection Agency – Region 2  
290 Broadway- 26<sup>th</sup> Floor  
New York, New York 10007-1866

Dear Regional Administrator Steinberg:

Thank you for the USEPA's support on New Jersey's recommendation for the designation and boundaries of the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS) for the New York and Philadelphia Metropolitan nonattainment areas. New Jersey Department of Environmental Protection (NJDEP) is disappointed that the USEPA did not support the recommendation for the designation and boundaries of the 2006 24-hour PM<sub>2.5</sub> NAAQS for Knowlton Township (August 14, 2008 letter from Regional Administrator Alan Steinberg). This designation is not only justified but needed to protect the health of New Jersey residences.

Technically sound air quality modeling information was presented to show the predicted nonattainment in the area due to sources from upwind states. The fact that there is not a PM<sub>2.5</sub> monitor in the area should not preclude it from being designated as nonattainment with Northampton and Lehigh Counties in Pennsylvania. In fact, the modeling information should be considered because there is no monitor available to evaluate the air quality impact surrounding the Portland Generating Station. See **Attachment 1**, NJDEP's response to the USEPA's technical analysis for the Allentown-Bethlehem-Easton PA-NJ area.

Earlier modeling results were submitted to EPA with NJDEP's initial recommendation. In addition, on September 17, 2008, NJDEP sent CALPUFF and AERMOD modeling results to Ray Werner at USEPA Region 2 for further consideration. The various CALPUFF modeling conducted by the NJDEP consistently demonstrates that allowable emissions from the Portland Generating Station—located in Northampton County, Pennsylvania within one mile of Knowlton Township—result in violations of the revised 24-hour PM<sub>2.5</sub> NAAQS in Knowlton Township. NJDEP additionally conducted AERMOD modeling in response to the recommendation from USEPA Region 2 staff. USEPA Region 2 staff provided this recommendation specifically in the

context of NJDEP's recommendation to designate Knowlton Township as nonattainment for the revised PM<sub>2.5</sub> standard. Like the CALPUFF modeling performed by NJDEP to date, the AERMOD modeling further supports NJDEP's recommendation as it similarly shows violations of the 24-hour PM<sub>2.5</sub> NAAQS in Knowlton Township due to the Portland Generating Station in Pennsylvania.

Accordingly, based the response to the USEPA's analysis submitted herein in conjunction with the materials submitted by NJDEP to date, USEPA should reconsider its preliminary determination not to include Knowlton Township into a multi-state 24-hour PM<sub>2.5</sub> nonattainment area with Pennsylvania's Northampton-Lehigh County nonattainment area.

If you have any questions regarding this proposal, please contact William O'Sullivan, Director of the Division of Air Quality, at (609) 984-1484.

Sincerely yours,



Lisa P. Jackson  
Commissioner

Enclosure

c: Nancy Wittenberg, Assistant Commissioner  
William O'Sullivan, Director  
Ray Werner, USEPA Region 2

bc: Chris Salmi, Assistant Director  
John Gorgol, Acting Bureau Chief  
Danny Wong, BAQP  
Ruth Carter, DAG  
Richard Ruvo, USEPA Region 2  
Official SIP files

### Attachment 1

#### **Response to USEPA Technical Analysis for the Allentown-Bethlehem-Easton PA-NJ Area**

**NJ Comment #1:** On page 3 and 4 in USEPA's technical analysis (Attachment 1 to Regional Administrator Steinberg's August 14, 2008 letter to Commissioner Jackson), there are two pie charts showing the "urban increment" of PM<sub>2.5</sub> for the Allentown, PA area during the summer and the winter. By using the data of only "high" days (top 5% of days), this analysis misses the underlying regional signal. This analysis also does not take into account the direct impact of a major point source such as the Portland Generating Station, which is situated directly next to Knowlton Township. Portland Generating Station is the single largest source of both SO<sub>2</sub> and carbon emission in the Knowlton area.

**NJ Comment #2:** Although there is no air quality monitor in the immediate area of Knowlton, there is a monitor in Phillipsburg of Warren County. This Warren County monitor has a (2005-2007) design value of 34 µg/m<sup>3</sup>. Since this monitor is used to designate Warren County and Knowlton is in Warren County, then it is safe to assume that Knowlton's PM<sub>2.5</sub> level is comparable to Phillipsburg. If the starting value at Knowlton is 34 µg/m<sup>3</sup>, then any PM<sub>2.5</sub> emission (direct and secondary) from the Portland Generating Station would easily put the Knowlton area over the 35 µg/m<sup>3</sup> air quality standard. 34 µg/m<sup>3</sup> is sufficiently close enough to the standard that Knowlton should be designated as nonattainment with the Pennsylvania area, especially when there is a major point source with high SO<sub>2</sub> and PM<sub>2.5</sub> emissions immediately next to the town.

**NJ Comment #3:** New Jersey disagrees with USEPA's assessment that the Delaware River does not significantly influence the airshed. Knowlton and the Portland Generating Station are located on either side of the river. Being situated in the river valley, the airshed is limited in its mixing so that the emissions from the Portland Generating Station would directly impact Knowlton. Geography and topography in this case does significantly influence the airshed.

**NJ Comment #4:** The USEPA is using the state line between Pennsylvania and New Jersey as the boundary for the nonattainment area because it is the jurisdictional boundary. For most situations, this would be the correct approach. But for air pollution, there is no boundary, especially in the case of Knowlton. The state line does not prevent the SO<sub>2</sub> and PM<sub>2.5</sub> emissions from the Portland Generating Station from raising the PM<sub>2.5</sub> level in Knowlton to above the air quality standard, thereby, putting the health of Knowlton citizens at risk. Accordingly, the USEPA should have considered emissions from Pennsylvania, particularly Northampton County and the Portland Generating Station, in evaluating the air quality of the area.

**NJ Comment #5:** The USEPA states that their regulation requires the use of air monitoring data to make the designation. The Clean Air Act does not specifically require monitoring data when designating or redesignating an area. In addition, the regulations cited by the USEPA, 40 C.F.R. §50.13(c), which references Appendix N of this part, does not specifically provide that monitoring data is the only data that can be used in support of a redesignation or designation. Further, USEPA's June 8, 2007 memo, "Area Designations for the Revised 24-Hour Fine

Particle National Ambient Air Quality Standard," from Acting Assistant Administrator Meyers provides guidance to how to approach the designation for the 2006 PM<sub>2.5</sub> NAAQS. As guidance, it should not limit states from considering other scientifically valid approaches to understanding air quality in an area. New Jersey agrees that quality assured air quality monitoring data should be used wherever available. In the case of Knowlton, the use of air quality modeling data to supplement the region's air monitors is appropriate given the geographical complexities of the area.

See, e.g., 52 Fed. Reg. 49408 (December 31, 1987), "According to section 171(2) of the Clean Air Act, 'the term 'nonattainment data' means, for any pollutant area which is shown by monitored data or which is calculated by air quality modeling (or other methods determined by the Administrator to be reliable) to exceed any national ambient air quality standards for such pollutant.'" New Jersey provided technically sound and consistent modeling results based on two different models, when used with regional air monitoring data, that indicate violations to the 2006 24-hour PM<sub>2.5</sub> NAAQS at Knowlton due to the Portland Generating Station. Also, the nearest Warren County monitor in Phillipsburg is at the edge (34  $\mu\text{g}/\text{m}^3$ ) of the health standard and that the Portland Generating Station emits a significant amount of SO<sub>2</sub> and PM<sub>2.5</sub> directly into Knowlton's complex terrain airshed.