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Date: 2/26/99 1:09pm
Subject: AGREEMENT IN PRINCIPLE - Final Version

Below is the final version of the AGREEMENT IN PRINCIPLE. Print it out, tack up on your wall, and believe that it will bring about an expeditious but definitive conclusion to this modeling endeavor.

**WARREN COUNTY, NJ NONATTAINMENT AREA
AGREEMENT IN PRINCIPLE**

The participants of the Warren County Sulfur Dioxide Non-attainment Area Study (EPA Region III, EPA Region II, Pennsylvania DEP, New Jersey DEP, PP&L Inc., and GPU Genco) have reached an agreement on how the compliance modeling study should proceed. The basis of the agreement is that the compliance modeling will be done in two separate modeling domains, with each utility using their own meteorological data set to model their own impact, in combination with the other utility, on the terrain surrounding their facility. The integrity of employing sound modeling practices is also agreed to. Below is an outline of the agreement in principle:

Modeling Methodology

1. AERMOD will be used to model all sources and all receptors.
2. The modeling receptor domain will be divided into two domains, the northern receptor domain and the southern receptor domain. This division should occur roughly along the Pequest River eastward through New Jersey, and at approximately the latitude of the Pequest River on the western, or Pennsylvania, side of the division. The receptor domains will include all of the receptors specified in Section 3.0 of the document Modeling Protocol for NAAQS Compliance Analysis for Warren County, New Jersey Using AERMOD (January 11, 1999). In addition, receptors are to be placed in areas surrounding each utility that are expected to produce high concentration impacts.
3. For the southern receptor domain (including Scotts Mountain), all sources will be modeled with the years of PP&L Sodar and tower meteorological data (July 1991 through June 1994) collected near the Martins Creek Power Plant site that are adequate for the modeling and are of good quality. A justification for not using any one of the three years of available met data must be included in the modeling protocol.
4. For the northern receptor domain (including Jenny Jump Mountain), all sources will be modeled with one year of GPU Sodar and tower meteorological data (July 1993 through June 1994) collected near the Portland Power Plant site.
5. Sources listed in Table 4.1 of the document Modeling Protocol for NAAQS Compliance Analysis for Warren County, New Jersey Using AERMOD (January 11, 1999) will be included

in the modeling analysis except for Hoffmann-LaRoche Stack 2. The sulfur dioxide emission rate of Hoffmann-LaRoche Stack 1 should be reduced to 39.1 lbs/hr. In addition, major sources located in or near the area surrounding each utility (that have not been included in past modeling analyses) may be required to be included if they can reasonably be expected to cause a significant concentration gradient and cannot be adequately represented by the estimated background concentration. It will be the responsibility of the state agencies to supply the necessary source data for any additional sources.

Schedule for Submittal of the Model Compliance Study

March 19, 1999 - Submittal of a compliance modeling protocol for the compliance study by PP&L and GPU. The PP&L modeling protocol shall address the modeling of the southern receptor domain. The GPU modeling protocol shall address the modeling of the northern receptor domain. Comments made on the earlier modeling protocol (Modeling Protocol for NAAQS Compliance Analysis for Warren County, New Jersey Using AERMOD, dated January 11, 1999) that are still relevant shall be addressed in the new protocols.

April 9, 1999 - Approval of protocols by reviewing agencies.

May 14, 1999 - Submittal of compliance modeling analysis by PP&L and GPU.