

W. O'Sullivan



NJDEP BUR. REL. PREV.
DIV. OF ENVIRONMENTAL QUALITY

JUL 13 10 04 AM '92

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

June 19, 1992

7/9

Redacted

Redacted

Redacted

Allan Dresser
Div. of Environmental Quality
New Jersey DEP
John Fitch Plaza CN 027
Trenton, NJ
08625

Reference: MARTINS CREEK INTERIM PROCEDURES STUDY
involving
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION,
PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES,
ENVIRONMENTAL PROTECTION AGENCY,
AND PENNSYLVANIA POWER AND LIGHT COMPANY

Dear Allan:

This letter is to serve as formal notice that the Air Quality Model Performance Evaluation and Comparison Study for the Martins Creek Steam Electric Station began as of May 1, 1992. It is also the intent of this letter to clearly state the purpose of this study and a number of operational agreements-of-understanding that have developed while implementing this study.

As a result of air quality modeling conducted in support of a PSD permit application which was submitted to the New Jersey Department of Environmental Protection (NJDEP) by the Warren County Resource Recovery facility (located in New Jersey), Pennsylvania Power & Light Company's (PP&L) Martins Creek facility (located in Pennsylvania) was identified as a major contributor to modeled SO2 nonattainment in Warren County, New Jersey.

NJDEP requested that EPA designate Warren County as non-attainment for SO2 based on the results modeling submitted by the Warren County Resource Recovery facility and based on addition air quality modeling prepared by NJDEP and EPA. The final redesignation of Warren County appeared in the Federal Register, pages 49408-49411, Vol.52, No.251, Thursday, December 31, 1987. The redesignation was effective as of February 1, 1988.

Based on the information supplied by NJDEP and EPA, the Pennsylvania Department of Environmental Resources (PaDER) contacted PP&L to inform them that a review of the State's Implementation Plan (SIP) relative to their Martins Creek facility must be conducted. The review is necessary to determine if the Martins Creek facility is contributing to a modeled violation of the Federal Ambient Air Quality Standards and to determine what, if any, revision to Pennsylvania's SIP must be made to the emission limits for Martins Creek.

In response to PaDER's need to review Martins Creek's SO₂ emissions impact, PP&L proposed an Interim Procedures Model Evaluation Study which will compete EPA's Rough Terrain Dispersion Model (RTDM) and Multi Point Terrain (MPTE) air dispersion models with the Large Power Plant Effluent Study (LAPPE) model. The air quality model performance evaluation and comparison protocol for this Study was sent to all parties on May 17, 1990 and was subsequently approved by all parties. PP&L feels that the RTDM Guideline model is not the most appropriate model to use to define their facility's SO₂ impact in the terrain in question in the Warren County, N.J. area. PP&L believes that the LAPPE model will be shown to be a better performing model than the EPA Guideline model. The purpose of the model competition is to determine which of these air quality dispersion models performs the best characterizes the ambient air quality when compared to actual monitored ambient air quality data.

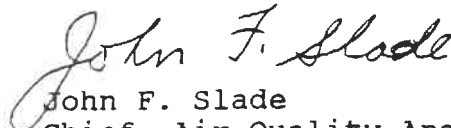
The following statements characterize the operational understandings that PaDER believes have been agreed upon to date:

1. PaDER, NJDEP and EPA have reviewed and approved the air quality model performance evaluation and comparison protocol which forms the basis for an Interim Procedures Model Evaluation Study between RTDM/MPTE and LAPPE, which is hereby incorporated by reference in this letter.
2. PP&L began operation of ambient air quality monitoring stations and the meteorological monitoring equipment in accordance with the requirements of the attached modeling protocol on May 1, 1992.
3. PP&L will supply processed data from the monitoring network to EPA, PaDER, and NJDEP on a quarterly basis within 60 days of the end of a quarter. Furthermore, PP&L will upon request make available, within a reasonable time period, any and all raw data collected in support of this Interim Procedures Study.
4. PP&L will complete a final report on the Interim Procedures Model Evaluation Study for Warren County, N.J. as specified in the attached protocol. In addition PP&L will submit the final report to PaDER, NJDEP, and EPA within 120 days of the collection of one year of validated data by all the responsible parties and submittal of the data to PP&L, unless extended by PaDER.
5. PaDER will be the lead agency in overseeing PP&L's performance during the study. PaDER will coordinate with PP&L, NJDEP and EPA any decisions needed during the course of the study. All parties agree to a review and comment on any issues in a timely manner.
6. PaDER will secure hourly emission and stack parameter data from MetEd for their Portland electric generating station. PaDER will provide the data to PP&L for use in the Interim Procedures Model Evaluation Study.

7. NJDEP will secure hourly emission and stack parameter data from Hoffman-LaRoche and the Warren County Resource Recovery Facility. NJDEP will provide the data to PaDER and PP&L for use in the Interim Procedures Model Evaluation Study.

If any parties have comments or disagreements with the content of this letter, please contact me at (717) 787-4310.

Very truly yours,

A handwritten signature in cursive script that reads "John F. Slade". The signature is written in dark ink and is positioned above the typed name and title.

John F. Slade
Chief, Air Quality Analysis Section
Pa. Bureau of Air Quality Control