



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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January 9, 2017

The Honorable Judith A. Enck
Regional Administrator
United States Environmental Protection Agency – Region 2
290 Broadway – 26th Floor
New York, New York 10007-1866

Dear Regional Administrator Enck:

The purpose of this letter is to provide you with updated information to New Jersey's designation request for the 2010 Primary 1-hour Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) of 75 parts per billion (ppb). This additional information is for the United States Environmental Protection Agency (EPA) to consider for completion of designations by December 31, 2017.

New Jersey initially submitted a designation letter on June 23, 2011 to EPA requesting Warren County, and portions of Hunterdon, Morris and Sussex Counties, be designated as nonattainment due to the impacts from the Portland Power Plant in Pennsylvania. With the success of the Clean Air Act Section 126 Petition and cessation of coal burning at Portland, New Jersey is now recommending that the entire State of New Jersey be designated attainment for the 2010 Primary 1-hour SO₂ NAAQS. New Jersey strongly requests this designation as all monitors in the State are in attainment of the 75 ppb standard. Additionally, there are no large sources of SO₂ emissions in the State that are applicable to the federal Data Requirements Rule. Years of monitoring analyses, regulatory development and timely action to implement control measures for SO₂ have resulted in a decreasing trend in SO₂ levels in New Jersey.

New Jersey originally submitted designation recommendations for the 1-hour SO₂ NAAQS on June 23, 2011. On February 6, 2013, EPA responded that it was unable to issue designations due to insufficient information, including three full complete years of monitoring data at the Columbia Wildlife Management Area in Warren County. Subsequently, EPA entered into a consent decree with the court that prescribed a process, or "Rounds", for how designations would proceed, given the lack of adequate data in several areas of the country. New Jersey now has

three complete calendar years of SO₂ monitoring data and is submitting supplemental information as part of "Round 3" designations per EPA's guidance.¹

Additionally, on August 10, 2015, the EPA finalized the "Data Requirements Rule for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)" (DRR). This rule established requirements for states to characterize air quality around point sources that emit 2,000 tons per year (tpy) or greater of SO₂ by either modeling the actual emissions from the source or using appropriately sited ambient air quality monitors. This rule was not applicable to New Jersey since there are no sources located in New Jersey with actual SO₂ emissions that exceed the 2,000 tpy threshold. In fact, the total actual emissions for the entire State of New Jersey is approximately 2,700 tons per year (see Attachment 1).

A table of current monitor design values from 2013-2015 is attached to this letter (Attachment 2). Also attached to this letter is a table listing the top 25 SO₂ point sources in New Jersey (Attachment 3). Totaling the 2015 emissions from the top ten SO₂ sources in New Jersey would still not trigger EPA's DRR's threshold of 2,000 tpy. Attachment 3 lists New Jersey's county level total SO₂ emissions for 2015 and the number of sources within each county. Based on this grouping, the largest county total SO₂ emissions is 809 tons, of which 744 tons are from a single facility that is scheduled to shut down in 2017. New Jersey expects SO₂ levels to continue to decrease in 2016 due to New Jersey's Sulfur in Fuels Rule (N.J.A.C. 7:27-9), which further lowered the sulfur content limits for heating and residual oils beginning June 2016, as well as, implementation of low sulfur gasoline in 2017.

In summary, given that all New Jersey monitors have demonstrated attainment and the offending out-of-state source has been addressed, the Department strongly requests that EPA designate the entire State in "Attainment". If you have any questions regarding New Jersey's recommendations, please contact Francis C. Steitz, of the Division of Air Quality, at (609) 984-6721.

Sincerely yours,


Bob Martin
Commissioner

Attachments

- c: John Filippelli, USEPA Region 2 (electronic copy)
- Richard Ruvo, USEPA Region 2 (electronic copy)
- John Renella, New Jersey DAG (electronic copy)
- Francis C. Steitz, NJDEP (electronic copy)

¹ Memorandum from Stephen D. Page to Regional Air Division Directors, Regions 1 – 10, "Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standards – Round 3," July 22, 2016.

Attachment 1: Total SO₂ Emissions and Number of Point Sources per County

County	# Point Sources	Total 2015 SO₂ Emissions (tons)
Atlantic	13	146
Bergen	19	56
Burlington	13	48
Camden	10	25
Cape May	4	464 ^a
Cumberland	14	125
Essex	20	110
Gloucester	25	342 ^b
Hudson	13	147
Hunterdon	7	0.7
Mercer	17	81
Middlesex	57	125
Monmouth	10	28
Morris	10	1.4
Ocean	10	36
Passaic	8	9
Salem	12	809 ^c
Somerset	13	4
Sussex	4	44
Union	29	99
Warren	9	30
Total	317	2,730

^a B.L.England Generating Station 2015 SO₂ Emissions = 453 tons

^b Logan Generating Plant 2015 SO₂ Emissions = 250 tons

^c Carneys Point Generating Plant 2015 SO₂ Emissions = 744 tons

Attachment 2: 3-year Average Design Values Based on the 99th Percentile of the Maximum Daily 1-Hour SO₂ Concentrations at New Jersey Monitors

Site	2013	2014	2015	3-Year Average Design Value (1-hour SO ₂ NAAQS = 75 ppb)
Brigantine	7	7	5	6
Camden Spruce Street	9	10	16	12
Newark Firehouse	8	9	5	7
Bayonne	10	10	5	8
Jersey City	8	9	4	7
Chester	6	12	7	8
Elizabeth	6	7	4	6
Elizabeth Trailer	14	13	15	14
Columbia	81*	78*	5	55*

* High SO₂ values attributable to operation of the Portland Power Plant in Upper Mount Bethel Township, Northampton County, Pennsylvania. The coal-fired generating units were subsequently shut down in to comply with the final limits, effective January 2015, in USEPA's "Final Response to Petition From New Jersey Regarding SO₂ Emissions From the Portland Generating Station," 76 FR 69052 (November 7, 2011).

Attachment 3: 2013-2015 Emissions Data (Tons per Year) for Top 25 SO₂ Sources in New Jersey

Facility Name	NAICS Code	County	City	2013	2014	2015	3-year Avg.
Carneys Point Generating Plant	221112	Salem	Carneys Point	930	977	744	884
B. L. England Generating Station	221112	Cape May	Beesley's Point	690	623	453	589
Logan Generating Plant	22111	Gloucester	Swedesboro	562	287	250	366
Hudson Generating Station	221112	Hudson	Jersey City	138	198	111	149
Covanta Essex Company	562213	Essex	Newark	135	140	96	124
Ardagh Glass Inc.	327213	Cumberland	Bridgeton	107	111	81	100
Atlantic County Utilities Authority Landfill	562998	Atlantic	Egg Harbor Twp.	83	109	74	89
PSEG Fossil LLC Mercer Generating Station	221112	Mercer	Hamilton	72	91	73	79
Atlantic County Landfill Energy, LLC	221118	Atlantic	Egg Harbor	70	82	70	74
Ardagh Glass Containers Inc.	327213	Salem	Salem	62	64	55	60
Paulsboro Refining Company LLC	324110	Gloucester	Paulsboro	56	62	53	57
Sussex County Landfill Energy LLC	221118	Sussex	Lafayette	53	56	40	50
Phillips 66 Bayway Refinery	324110	Union	Linden	44	46	33	41
Union County Resource Recovery Facility	562213	Union	Rahway	35	44	32	37
Geryau Ameristeel Sayreville	33111	Middlesex	Sayreville	34	39	28	34
Gerresheimer Moulded Glass	327213	Cumberland	Millville	33	39	26	33
Balefill Landfill	562212	Bergen	North Arlington	28	38	27	31
Burlington County Resource Recovery Complex	562212	Burlington	Mansfield	28	36	25	30
Wheelabrator Gloucester Company L P	562213	Gloucester	Westville	24	26	23	24
MCUA Landfill Gas Utilization Project	221118	Middlesex	Sayreville	23	24	22	23
Monmouth Energy Inc	221118	Monmouth	Tinton Falls	22	23	21	22
Recycling Technology Development	423930	Middlesex	Keasbey	21	22	21	21
Covanta Warren Energy Resource Co. L.P.	562213	Warren	Oxford	17	20	20	19
Buckeye Port Reading Terminal	324110	Middlesex	Pt. Reading	17	20	19	19
Camden County Energy Recovery Associates, L.P.	562213	Camden	Camden	17	19	18	18
All Other Facilities				379	417	315	371
TOTAL				3679	3615	2730	3342