

**From:** [Joseph Basralian](#)  
**To:** [comments, EMP](#)  
**Subject:** [EXTERNAL] The EMP Does Not Go Far Enough  
**Date:** Friday, July 19, 2019 12:45:59 PM

---

Hello,

The current draft of the EMP does not go far enough. It should guide to zero additional toxic fuel infrastructure immediately.

As a case in point, I wrote the following response to the proposed Meadowlands Power Plant, to demonstrate the toxic air quality effects of this single plant's likely emissions. Yet this is just a fraction of the damage that even ONE plant would do. Though the plant will cause the problems described in the letter below, the letter does not even include its enormous additional damages from:

- fracking the gas
- flaring the gas
- transporting the gas
- the global warming impact
- the avoided benefits of using clean power alternatives

Toxic emissions from gas-fired power plants increase lung-related illness such as asthma and COPD.

As you know, both illnesses can seriously impact people's quality of life, financial burden and their entire families. For New Jersey parents with asthmatic children, there are thousands terrifying nights in emergency rooms and pediatric intensive care units every year. Residents of Hudson, Essex and Bergen County could be most harmed by the plant, though residents far and wide could be impacted.

In Hudson County alone -- where the plant would be located -- 45,000 residents are diagnosed with asthma, including 10,000 children, amounting to 9.5% of the population. In 2016, there were over 600 hospitalizations due to asthma and over 4,000 emergency room visits, above the NJ average.

Staying with the Hudson County example, nearly 30,000 residents are diagnosed with COPD. Nearly 1,500 of them visit the ER each year and over 17,500 are hospitalized. These data are from the New Jersey State Health Assessment and the Centers for Disease Control.

The unnecessary power plant would increase already-high levels of nitrogen dioxide and ground-level ozone, two pollutants that are known to exacerbate asthma and COPD. The NJDEP allows companies to purchase ozone credits, which means it will allow any level of ozone pollution. Hospitalizations tend to increase on high pollution days.

In 2016, New Jersey registered 25 days with ground-level ozone above the maximum threshold for healthy communities, based on the new 0.070 parts-per-million standard. The worst-off area in New Jersey was Hudson County, where the power plant is proposed, with 16 days with high ozone. The American Lung Association gave Hudson County an "F" for failing to control ozone pollution. Bergen County residents contended with 6 days of unhealthy ground-level ozone, and Essex County with 3,

but these numbers could increase. These data are provided by the New Jersey State Health Assessment.

Nitrogen oxides, which are a key ingredient in ground-level ozone and smog, would also intensify. Nitrogen oxides can be produced from typical natural gas-fired power plants at rates of 2,500 - 25,000 parts per billion, far above the 100 ppb maximum allowable for human health, according to the U.S. Department of Energy.

There are many more reasons to worry. The plant could annually spew an average 2.6 million metric tons of carbon dioxide, 1,000 metric tons of methane, heavy metals and chemicals. Steam released through cooling towers adds lead, algacides, fungicides, and volatile organic compounds to our lives.

In addition to its two, 312-foot tall exhaust stacks next to streams in the Meadowlands, the plant would need to store 3.5 million gallons of diesel fuel even though it would be located in a flood zone.

The plant would “lock in” fossil fuels for 30 years or more, preventing a transition to clean energy, which both New Jersey and New York have pledged to pursue. It would strengthen the polluting gas fracking industry nationwide, which produces toxic discharges in the air, groundwater, rivers, lakes and streams as the gas is drilled. Over 700 chemicals are used in gas fracking, which produces many billions of gallons of toxic wastewater. Property tax revenue to North Bergen would be slashed by a 90% tax exemption for electricity-producing facilities, and could be consumed by the town’s need to increase road and emergency services costs to accommodate the plant.

**BOTTOM LINE,** I urge the State to adopt an EMP that is more restrictive in the near term on any new toxic fuel infrastructure.

Joe Basralian  
24 Fairfax Terrace  
Chatham, NJ  
[jbasralian@gmail.com](mailto:jbasralian@gmail.com)