



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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December 22, 2017

Via eSIP

Honorable Peter D. Lopez
Regional Administrator
USEPA, Region II
290 Broadway, 26th Floor
New York, NY 10007-1866

RE: New Jersey Final 8-Hour Ozone Attainment Demonstration and
Nonattainment New Source Review (NNSR) Program Compliance Certification

Dear Regional Administrator Lopez,

Enclosed for your review and approval is a revision to New Jersey's State Implementation Plan (SIP) for Air Quality including:

- Attainment Demonstration for the 1997 84 ppb Ozone National Ambient Air Quality Standards (NAAQS) for the Northern New Jersey-New York-Connecticut (NNJ-NY-CT) nonattainment area;
- Attainment Demonstration for the 2008 75 ppb Ozone NAAQS for the NNJ-NY-CT nonattainment area; and,
- Statewide Nonattainment New Source Review (NNSR) Program Compliance Certification for 2008 75 ppb Ozone NAAQS, even though current monitoring data in New Jersey is meeting the 2008 75 ppb Ozone NAAQS.

Air quality analysis indicates that even if New Jersey turned off all business and industry sources of air pollution in the State, the Connecticut monitors would still exceed the ozone health standard. All reasonable control measures have already been required in NJ. It would be unreasonable to shutdown business and industry in NJ when other states that contribute

significantly to Connecticut ozone have not adopted reasonable measures that have been in place in NJ for many years.

USEPA needs to do their part achieve the ozone health standards. That includes better addressing NOx and ozone transported from major stationary sources, especially power plants, in all other states that significantly contribute to Connecticut ozone levels. It also includes using USEPA's authority to further reduce NOx from mobile sources throughout the USA. In this region, mobile sources, both on road and off road, are the major sources of NOx.

Within the New York City Metropolitan nonattainment area, New York State DEC and New York City DEP need to do more to address their contributions to the Connecticut monitors. In this attainment demonstration, NJ has clearly laid out control measures for the New York City area that would significantly reduce NOx on the worst ozone days. New Jersey has already addressed High Electric Demand Day (HEDD) electric generators, engines used for distributed generation, and municipal waste combustors, all of which curtail NOx emissions on high ozone days. New York should adopt measures already in place in New Jersey.

New Jersey's ambient air quality monitors in its Northern nonattainment area are currently measuring attainment of the 75 ppb ozone standard. New Jersey has met its obligations for attainment of the 84 ppb and 75 ppb ozone NAAQS. All appropriate control measure requirements have been adopted. It is now USEPA's responsibility to ensure that neighboring and upwind states, both inside and outside of the nonattainment area, do their part to address unhealthful ozone at the Connecticut and New York monitors.

Thank you and your staff for their assistance in reviewing drafts of this SIP revision. If you or your staff have any questions, please contact Francis C. Steitz at (609) 633-8220.

Sincerely,

Bob Martin
Commissioner

Enclosures:
SIP Revision

c (Email letter only):

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