



# State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

OFFICE OF THE COMMISSIONER

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BOB MARTIN  
*Commissioner*

July 21, 2014

Honorable Judith A. Enck  
Regional Administrator  
USEPA, Region 2  
290 Broadway, 26<sup>th</sup> Floor  
New York, NY 10007-1866

RE: New Jersey Ozone RACT/2011 Periodic Emission Inventory/Carbon Monoxide  
Maintenance and Monitoring Plan

Dear Regional Administrator Enck:

Enclosed for your review is a proposed revision to New Jersey's State Implementation Plan (SIP) for Air Quality specific to the 8-hour 75 ppb Ozone National Ambient Air Quality Standards Reasonably Available Control Technology (RACT) implementation, the 2011 periodic emission inventory, and the carbon monoxide maintenance and monitoring plan.

This proposed SIP revision addresses New Jersey's RACT obligations pursuant to the Clean Air Act as they apply to states within the Ozone Transport Region for the 75 ppb ozone standard. It includes a RACT assessment and New Jersey's commitment to propose rule revisions to further reduce the emissions of ozone precursors (oxides of nitrogen and volatile organic compounds) in accordance with the New Jersey Administrative Procedures Act (APA) (N.J.S.A. 52:14B-1 et. seq.) and the Air Pollution Control Act (APCA) (N.J.S.A. 26:2C-1 et. seq.).

As discussed in Section v of the RACT proposal, New Jersey takes exception to USEPA's lack of action on upwind states, which continues to place New Jersey in an economically less competitive position. USEPA should focus its resources on reducing ozone transport from upwind states and addressing daily emissions of oxides of nitrogen (NO<sub>x</sub>). USEPA is already aware that maximum daily NO<sub>x</sub> levels are increasing in some states upwind of New Jersey.

New Jersey is meeting its responsibilities by working with other states and the federal government to remedy RACT inconsistencies among states and to ensure that all states do their part to reduce ozone levels throughout the Northeast; USEPA needs to do its part.

This proposed SIP revision also contains New Jersey's full air quality emission inventory for 2011, with the presentation of data focusing on ozone precursor pollutants. Please note the trend data which documents the significant reductions in air pollutant emissions in New Jersey.

In addition, this proposed SIP revision contains a 10-year maintenance plan for the northern New Jersey carbon monoxide maintenance area and summarizes carbon monoxide monitoring changes throughout New Jersey. The carbon monoxide air quality in New Jersey is far below the health standards, which enabled a reduction in the amount of monitoring.

We appreciate the assistance your staff provided New Jersey in preparing this proposed SIP revision. Additional information regarding public notification and participation will be forwarded to Mr. Rick Ruvo, USEPA Region II, under separate cover.

If you or your staff has any questions, please contact Ms. Sharon Davis, Air Quality Planning Section Chief, at (609) 292-6722.

Sincerely,

Bob Martin  
Commissioner

Enclosures

cc (Letter only):

Jane Kozinski, Assistant Commissioner, NJDEP

Rick Ruvo, USEPA

John R. Renella, New Jersey DAG

Sharon Davis, Section Chief, Air Quality Planning, NJDEP

William O'Sullivan, Director, Division of Air Quality, NJDEP