



**State of New Jersey**  
Department of Environmental Protection  
Division of Air Quality  
Bureau of Air Quality Planning  
P.O. Box 418  
Trenton, New Jersey 08625-0418

James E. McGreevey  
*Governor*

Bradley M. Campbell  
Commissioner

March 23, 2004

John Filippelli  
USEPA Region II  
Air Programs Branch  
290 Broadway, 25<sup>th</sup> Floor  
New York, NY 10007-1866

Dear Mr. Filippelli:

This letter is in response to a telephone conversation between Mr. Ken Fradkin of your staff and Mr. Ray Papalski of my staff on March 19, 2004. In that conversation, New Jersey was asked to provide supplemental information in support of our position that southern New Jersey not be associated with the Philadelphia non-attainment area. I've enclosed a letter written to Mr. J. Wick Havens of the Pennsylvania Department of Environmental Protection on February 6, 2004. This letter articulates New Jersey's position and data concerning the attainment status of southern New Jersey. Due to the low emissions in southern New Jersey and the wind directions in the Philadelphia Region arising primarily from the west, we believe that southern New Jersey should not be located in the Philadelphia non-attainment area.

Should you have any questions, please call me at (609) 292-6722.

Sincerely Yours,

A handwritten signature in cursive script that reads "Bob Stern".

Bob Stern, Acting Manager  
Air Quality Planning



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James E. McGreevey  
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February 6, 2004

J. Wick Havens  
Chief, Air Resource Management Division  
Bureau of Air Quality  
P.O. Box 8468  
Harrisburg, PA 17105-8468  
e-mail (preferred) - jhavens@state.pa.us

Dear ~~Mr. Havens~~ <sup>Wick</sup>:

I appreciate the opportunity to review the January 9, 2004 document entitled "Proposed Recommendations to EPA for Fine Particulate (PM<sub>2.5</sub>) Attainment/Nonattainment Areas." The proposal details the Commonwealth of Pennsylvania's proposed recommendations for PM<sub>2.5</sub> non-attainment/attainment area boundaries. I would like to share with you some of the thoughts that went into developing New Jersey's approach for designating the PM<sub>2.5</sub> nonattainment area, for your consideration in developing Governor Rendell's recommendations.

New Jersey and Pennsylvania share concerns over three geographic areas. These areas are:

- the Philadelphia-Camden-Vineland, PA-NJ-DE-MD Combined Statistical Area (CSA) which includes 5 counties in Southern New Jersey (i.e., Burlington, Camden, Cumberland, Gloucester and Salem).
- New York-Newark-Bridgeport, NY-NJ-CT-PA CSA, which includes Pike County, Pennsylvania; and
- the Allentown-Bethlehem-Easton PA-NJ Metropolitan Statistical Area (MSA), which includes Warren County, New Jersey.

For reference purposes, I have enclosed a map showing the boundaries of these three areas (see Figure 1).

### Philadelphia-Camden-Vineland, PA-NJ-DE-MD CSA

As stated in your proposal, the Commonwealth recommendations are established "based primarily on the June 10, 2003, issued definitions of Core Based Statistical Area (CBSA) boundaries and Combined Statistical (CSA) Area boundaries." The Commonwealth's proposal recommends the inclusion of all the counties in the USEPA's proposed 8-hour ozone nonattainment area in a proposed Philadelphia PM<sub>2.5</sub> nonattainment area. This would include the New Jersey counties of Atlantic, Burlington, Camden, Cape May,

Cumberland, Gloucester, Mercer and Salem. The proposal therefore includes three New Jersey counties (Atlantic, Cape May and Mercer Counties) that are outside the CBSA/CSA.

In formulating New Jersey's recommendation options for PM<sub>2.5</sub> nonattainment areas, we first reviewed our monitoring data, and determined that the only exceedances of either PM<sub>2.5</sub> standard were in the Northeastern part of New Jersey. Based on this determination, we included the counties where those exceedances occurred in the all proposed nonattainment area options. From there, we mapped out various proposed nonattainment areas options in Northern New Jersey based on several different thresholds for contribution to those exceedances. Then the State addressed the inherent scientific differences between ozone and PM<sub>2.5</sub> that would necessitate that their nonattainment area boundaries be addressed separately and differently. Ozone's precursors (VOC and NO<sub>x</sub>) and formation chemistry are fundamentally different from direct particle emissions, which are the nearby component of PM<sub>2.5</sub> that is the more relevant component for PM<sub>2.5</sub> designation. In this way, we determined that the nonattainment areas for these two pollutants must be addressed separately. While making the PM<sub>2.5</sub> nonattainment area identical to the 8-hour nonattainment area might further "allow for integrated air quality planning among a group of counties and states that have experience working together to improve air quality," New Jersey is not using this as the sole basis for the designation of a nonattainment area. Instead, we focused on the air quality considerations of the area in question as the basis for the designation.

After establishing that the areas for ozone and PM<sub>2.5</sub> should be different, New Jersey determined that any final recommendation had to be consistent with the definition of a nonattainment area as provided in the Clean Air Act. Specifically, Section 107(d)(1)(A)(i) of the Clean Air Act defines a nonattainment area as

any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant.

As stated previously, currently no area of Southern New Jersey exceeds either the annual or 24-hour PM<sub>2.5</sub> NAAQS. In addition, there is no evidence that any area of Southern New Jersey is contributing to the violations of that standard in Philadelphia or any other area of Pennsylvania. This argument is strengthened by the fact that PM<sub>2.5</sub> emissions in Southern New Jersey are low compared to those in Philadelphia, and the wind direction in the Philadelphia region is primarily from west to east. As such, New Jersey is not recommending a nonattainment area for Southern New Jersey. If the Commonwealth has evidence showing Southern New Jersey's contribution to the Philadelphia exceedances, similar to the "1 percent of the standard" approach New Jersey took to establish contribution to the Northern New Jersey exceedances, we would be interested in reviewing that material.

Northern New Jersey-New York City

Pennsylvania's proposal excludes Pike County from the Northern New Jersey-New York City PM<sub>2.5</sub> nonattainment area. We reached the same conclusion, because we believe that Pike County contributes less than 1 percent to the monitored exceedances.

Mercer County, New Jersey contributes more to exceedances in the Northern New Jersey-New York City nonattainment area than to exceedances in the Philadelphia nonattainment area. For that reason, if Mercer County were included in any nonattainment area, our approach would put it in the Northern New Jersey-New York nonattainment area.

Allentown-Bethlehem-Easton PA-NJ MSA

New Jersey's ambient air monitoring site in Phillipsburg, New Jersey, which is in Warren County, indicates that the area is meeting the current 24-hour and annual NAAQSs. For that reason, we again came to the same conclusion as Pennsylvania that the Pennsylvania portion of this MSA be designated as attainment.

As always, New Jersey will continue to work with the Commonwealth to solve our air quality problems. We would be happy to meet and discuss this issue with you in more detail at your convenience.

Sincerely,



Robert Stern  
Acting Bureau Chief  
Air Quality Planning, NJDEP

c: S. Wolfe  
B. O'Sullivan  
C. Salmi  
H. Geduldig  
T. Key  
C. Schell

# Figure 1: Relevant Geographic Areas

