



State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
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JON S. CORZINE  
Governor

LISA P. JACKSON  
Commissioner

December 18, 2007

The Honorable Alan J. Steinberg  
Regional Administrator  
United States Environmental Protection Agency – Region 2  
290 Broadway- 26<sup>th</sup> Floor  
New York, New York 10007-1866

Dear Regional Administrator Steinberg:

The purpose of this letter is to transmit to you New Jersey's recommendations for fine particulate matter, or PM<sub>2.5</sub>, nonattainment areas designations for the revised 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS). In 2006, the United States Environmental Protection Agency (USEPA) adopted a revised 24-hour PM<sub>2.5</sub> NAAQS which became effective on December 18, 2006. The 24-hour NAAQS was revised from 65  $\mu\text{g}/\text{m}^3$  to 35  $\mu\text{g}/\text{m}^3$ ; the annual PM<sub>2.5</sub> NAAQS was readopted at 15  $\mu\text{g}/\text{m}^3$ . The Clean Air Act allows states to recommend areas for designation as nonattainment to the USEPA within one year of implementation of the new NAAQS. New Jersey's recommendations are summarized below.

Under the Clean Air Act, a nonattainment area is defined as an area that either does not meet the NAAQS or that significantly contributes to ambient air quality in a nearby area that does not meet the NAAQS. New Jersey utilized USEPA guidance issued June 8, 2007 to analyze the recommended nine factors to be used for determining nonattainment areas (Attachment A).

In addition, the New Jersey Department of Environmental Protection (NJDEP), Division of Air Quality performed a PM<sub>2.5</sub> air quality modeling analysis of the Portland Generating Plant in Northampton County, Pennsylvania (Attachment B). The impact of primary PM<sub>2.5</sub> emissions and secondary PM<sub>2.5</sub> particulates formed from sulfur dioxide and nitrogen oxides emissions were modeled to show that this facility's emissions increase the concentrations of PM<sub>2.5</sub> in areas of Warren County, New Jersey. When 24-hour background PM<sub>2.5</sub> concentrations representative of time periods of concern were added to Portland's modeled impact, there were predictions that Knowlton Township (Warren County) was above the 24-hour PM<sub>2.5</sub> standard. Therefore, the NJDEP is recommending that Knowlton Township, Warren County to be included in the Northampton-Lehigh County Nonattainment Area that is currently under consideration by Pennsylvania.

Based on the nine factor analysis, which includes 2004-2006 24-hour PM<sub>2.5</sub> monitoring data, the NJDEP recommends the following:

- Designate the Northern New Jersey/New York/Connecticut nonattainment area the same as that for the current annual PM<sub>2.5</sub> standard, which includes Passaic, Bergen, Morris, Essex, Hudson, Union, Somerset, Middlesex, Monmouth, and Mercer Counties in New Jersey;
- Designate the Southern New Jersey/Philadelphia/Delaware nonattainment area the same as that for the current annual PM<sub>2.5</sub> standard, which includes Burlington, Camden, and Gloucester Counties in New Jersey;
- Include Knowlton Township (Warren County, New Jersey) in the Pennsylvania recommended Northampton-Lehigh County nonattainment area.

The NJDEP recommends that the current annual PM<sub>2.5</sub> nonattainment areas remain the same as designated by the USEPA in December 2004.

A public meeting was held on December 6, 2007 at the Knowlton Township Municipal Building. Public comments were received at the meeting and in writing. These comments were taken into consideration in this designation recommendation.

If you have any questions regarding this proposal, please contact William O'Sullivan, Director of the Division of Air Quality, at (609) 984-1484.

Sincerely yours,



Lisa P. Jackson  
Commissioner

Enclosure

c: Gina McCarthy, CT DEP Commissioner  
Pete Grannis, NY DEC Commissioner  
Kathleen A. McGinty, PA DEP Secretary  
John Hughes, DE DNREC Secretary  
Nancy Wittenberg, Assistant Commissioner  
William O'Sullivan, Director  
Ray Werner, USEPA Region 2