

## 14.0 CONCLUSION

As discussed in Chapter 3, air monitoring data demonstrates that New Jersey and the states that share its nonattainment areas have made significant progress in reducing ozone levels. Section 3.2.3 highlights the 8-hour ozone monitor trends for the New Jersey portions of the Northern New Jersey/New York/Connecticut nonattainment area and Southern New Jersey/Philadelphia nonattainment area. In addition to showing the successes of the existing New Jersey, regional and Federal control programs at reducing ozone precursor emissions, the trends data in Chapter 3 demonstrate that New Jersey and the region are on the right path towards cleaner air.

The data in Chapter 5 provides a plausible demonstration that the two multi-state nonattainment areas associated with New Jersey will continue on the path to attain the 8-hour ozone health standard by their mandated June 15, 2010 attainment date. At its core, New Jersey's attainment demonstration is based on photochemical air quality simulation modeling that includes the implementation of numerous additional control measures prior to the summer of 2009 (these controls are referred to as Beyond On The Way (BOTW) measures, and are discussed in detail in Chapter 4). Both the United States Environmental Protection Agency (USEPA) and the Clean Air Act Advisory Committee support the use of a multi-analysis approach for 8-hour ozone attainment demonstrations in order to consider uncertainties and biases when using atmospheric models. Therefore, in its demonstration New Jersey adjusted the 2009 modeled design values to account for the fact that the photochemical modeling system used under predicts transport and ozone changes associated with emission reductions. Accurately representing the transport of ozone and its precursors is key to projecting future design values since, as highlighted in Chapter 2 and again in Chapter 9, transport accounts for more than half of the ozone problem in the Northeastern United States. Adjusting the modeling results for transport and accounting for some uncertainty in the modeling resulted in a range of future design values that show plausible attainment of the 8-hour ozone standard. Beyond the "transport adjusted" future design values, New Jersey provides additional analytical evidence to further address uncertainty in the core modeling, and to support its claim of plausible attainment

In Chapter 6, New Jersey uses the same control measures applied in its 2009 attainment demonstration to show its ability to meet its Reasonable Further Progress (RFP) milestones. These milestones are designed to insure incremental progress towards attainment, rather than relying upon the majority of emission reductions just prior to the attainment date. As highlighted by past successes in Chapter 3, New Jersey is committed to this type of steady progress to insure that the State is doing all it can as soon as practical to protect the health and well being of its citizens. New Jersey demonstrates that it can more than meet its RFP targets with its existing and planned emission control measures.

New Jersey commits to propose, by no later than November 2007, and adopt by May 2008, in accordance with the New Jersey Administrative Procedures Act and the New Jersey Air Pollution Control Act , (N.J.S.A. 26:2C-1 et. seq.), all the BOTW measures

included in the attainment photochemical modeling. In addition, New Jersey commits to propose, and adopt, pursuant to the New Jersey Administrative Procedures Act and the New Jersey Air Pollution Control Act, a number of other control measures that were not included in the 2009 BOTW modeling, but will result in emission reductions by 2009, as well as future measures that will result in emission reductions post-2010. It is important that New Jersey and its neighboring states continue to reduce emissions post-2010, as these longer-term measures provide:

- the regulated community with certainty and more time to identify the necessary funding to install control equipment, modify their products or usage patterns, and/or take other actions to implement pollution prevention strategies;
- the additional reductions, which would be relied upon should the state not attain by 2010; and
- additional public health protection, especially in view of health scientist and USEPA scientists' recommendation for a more protective ozone NAAQS.

Furthermore, these additional reductions in air pollution are prudent to provide needed air quality improvement and public health protection as soon as possible and to provide more certainty that the National Ambient Air Quality Standard (NAAQS) will be attained.

All of the control measures were identified through one or more of the state and regional efforts engineered to select viable control measures. Through New Jersey's "Reducing Air Pollution Together" workshop, six air quality workgroups were formed and collaborated over several months to develop recommendations on how to reduce air emissions from their source categories. The workshop initiative and New Jersey's participation in regional efforts are discussed in detail in Chapter 4. New Jersey hosted or participated in all of these efforts to insure it had not overlooked viable control measures. New Jersey also completed Reasonably Available Control Technology (RACT) and Reasonably Available Control Measures (RACM) analyses to insure source categories were thoroughly reviewed. The RACT analysis was proposed on February 2, 2007 and New Jersey expects to submit its final RACT SIP to USEPA in June of 2007. Chapter 7 provides New Jersey's RACM analysis, which demonstrates that there are no other reasonably available control measures that would advance the nonattainment areas' attainment date by one year, or to June 15, 2009 (which would require demonstration of attainment by the summer of 2008).

The implementation of all of these measures will serve not only to help insure that New Jersey's associated nonattainment areas meet their mandatory attainment date, but will insure that New Jersey is not negatively impacting any other area's ability to meet the NAAQS through transported emissions of ozone and its precursors (see Chapter 9). The State's attainment demonstration is not only based on New Jersey's committed actions, but on the committed actions of all the other states in the Ozone Transport Region. Should other states fail to address their contribution to the New Jersey associated multi-state nonattainment areas' air quality problems, it is unlikely that New Jersey's associated multi-state nonattainment areas will meet their attainment goal. Therefore, New Jersey requests that the USEPA keep transported emissions and impact in mind as it reviews the SIPs, particularly those from the upwind states.

Given that New Jersey's associated nonattainment areas must attain by June 15, 2010, the air quality levels from 2007 – 2009 will be used to judge success. We expect to see air quality improvement over this timeframe. This provides the USEPA with an opportunity to determine success in the “real” time as it processes the State's SIP submittal. The State has provided, in Chapter 8, contingency plans that require corrective action in the event that New Jersey misses its 2008 Reasonable Further Progress milestone or fails to attain the NAAQS by the summer of 2009.

New Jersey has included, as part of this proposed SIP Revision (see Chapter 10), proposed onroad vehicle emission budgets to insure that the plans and programs implemented by the Metropolitan Planning Organizations conform with the requirements of the SIP. Proposed general conformity emission budgets are included for McGuire Air Force Base and Lakehurst Naval Air Station to ensure that emissions from their operations also conform to the requirements of the SIP.

While it is evident that additional work is needed to meet the 8-hour ozone NAAQS, its important to note that much of the State attained the 1-hour ozone standard. New Jersey is requesting (see Chapter 11) that the USEPA make a finding that three (3) of its four (4) associated 1-hour nonattainment areas are meeting the 1-hour standard.

Taken together, this proposed SIP revision provides a comprehensive plan that:

- highlights the successes of the past and moves the State beyond the “old” 1-hour standard;
- identifies all the reasonable measures that can, and need to be, implemented in order for New Jersey, and its associated multi-state nonattainment areas, to attain the 8-hour ozone NAAQS, address transport in and out of the State and prepare for likelihood of a new more stringent NAAQS in the near future;
- proves that New Jersey can easily meet its RFP milestones of 2008 and 2009;
- provides a safety net of contingency measures in the event that the State fails to meet its RFP milestones or fails to attain the NAAQS on time; and
- sets general and transportation conformity budgets that allow for growth without negatively impacting the attainment of the 8-hour ozone NAAQS in the multi-state nonattainment areas;
- provides a plausible demonstration of attainment by June 15, 2010 in the two multi-state nonattainment areas associated with New Jersey.