



## Statement from OTC Calling on the US Environmental Protection Agency to Adopt and Implement Additional National Rules to Reduce Ozone Transport and Protect Public Health

The state members of the Ozone Transport Commission (OTC) call on the US Environmental Protection Agency (EPA) to promulgate federal regulations based on the successful regional and local control strategies and programs implemented in the OTC states. Implementing such measures on a national basis will protect the public by substantially reducing the ozone and particulate pollution that causes unhealthful air, results in respiratory illness and premature deaths, and contributes to the environmental degradation of our natural resources. The expeditious implementation of such national measures is essential to address the interstate transport provisions of the Clean Air Act contained in Section 110(a)(2)(D) and move us forward toward achieving the health and welfare national air quality standards.

Recent modeling work conducted for the state collaborative (a joint effort of the OTC and the Lake Michigan Air Directors Consortium (LADCO)) and the OTC Conceptual Model show that a program of multi-sector emission reductions is necessary to reduce significant contributions from the transport of air pollutants across state boundaries. Such reductions are necessary for areas to achieve the National Ambient Air Quality Standards for ozone and particulate matter, and to achieve reductions in other pollutants that contribute to regional haze. This work demonstrates tighter control for the power sector outlined in the state collaborative recommendations for replacing the Clean Air Interstate Rule (CAIR), and mobile and area sources are needed. Regarding mobile sources, the EPA must strengthen the current federal tailpipe and gasoline standards to further reduce emissions of nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) in a timeframe that would provide significant benefits under the reconsidered ozone standard.

In addition to electricity generating unit (EGU) and mobile sector controls, the EPA should develop and implement national programs for the following sources (in the order of their relative priority):

1. Large Non-EGU Point Sources
  - Industrial, Commercial and Institutional (ICI) Boilers
2. Consumer & Commercial Products
  - Consumer Products\*
  - Architectural, Industrial and Maintenance Coatings\*
  - Adhesives, Sealants, Primers and Solvents\*
3. Cement Kilns
4. Stationary Reciprocating & Combustion Engines & Distributed Generation
5. Other Industrial Sources
  - Asphalt Production and Paving\*
  - Glass Manufacturing\*
  - Mobile Equipment Repair and Refinishing\*
  - Solvent Cleaning Operations\*

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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OTC encourages EPA to review OTC analysis in the context of our attainment challenges and add or remove sectors to maximize environmental benefit. Source categories denoted by an asterisk (\*) are those for which OTC has already developed model rules. For these, EPA should develop national measures at the control levels the OTC is currently considering.

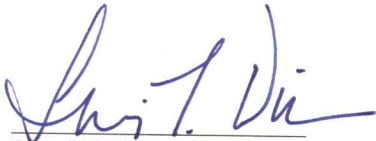
The OTC and LADCO have already discussed with EPA technical staff a framework for control of ICI boilers and stand ready to discuss these recommendations to assist EPA in moving forward

These national rules should be in addition to the EPA updating its requirements for nonattainment areas to require reasonable controls. National rulemaking and implementation of ozone control measures based on proven regional and local controls will provide significant health benefits across the country by reducing incidences of respiratory illness, hospital admissions and premature death that are triggered by exposure to ground-level ozone. Ozone is also a short lived global warming species; reducing ozone concentrations will also have impacts towards reducing the impacts of global climate change.

The states in the Ozone Transport Commission (OTC) continue to demonstrate leadership in the development and implementation of regional ozone control strategies that significantly improve air quality, are technically feasible and cost-effective. Nevertheless, we continue to encounter considerable challenges in meeting and maintaining the current eight-hour ozone standard to protect the public health through the implementation of regional and local controls, especially due to the transport of ozone precursor emissions from outside the OTC region. In addition, we recognize that further reductions will be necessary to meet a new and potentially more stringent standard for ozone that may be proposed by the US Environmental Protection Agency (EPA) in December.

The OTC was established under Sections 176A and 184 of the federal Clean Air Act (CAA) to ensure the development of regional strategies and to advise EPA on national programs and actions to reduce ground-level ozone to healthful levels.

Adopted on November 5, 2009:



Shari Wilson, Chair