

## Statement on Implementing Regional Emission Limits to Achieve Multi-Pollutant Reductions

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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444 N. Capitol St. NW Suite 638 Washington, DC 20001 (202) 508-3840 FAX (202) 508-3841 Email: ozone@otcair.org The Mid-Atlantic and Northeast states continue to face ground-level ozone concentrations that exceed the one-hour, and more protective eight-hour federal standards. While impressive reductions are expected from the NOx SIP Call once fully implemented, our technical analysis demonstrates that there is still a significant transport component from power plants and large industrial sources such as industrial boilers and cement kilns.

The OTC has a long history of working with EPA to encourage regional reductions of ozone precursors in addition to significant regional reductions in the OTR. Member states have broad consensus that the best way to achieve ozone reduction concurrently with meeting the objectives of other programs such as regional haze and the eight-hour particulate matter standards is by implementing multi-pollutant programs. Additionally, member states support the implementation of regional or national emission caps for power plants and large industrial sources.

While OTC supports strong national regulations or legislation as the preferred means for achieving these goals, these programs should not delay the needed reductions to achieve ambient air quality standards in the mandated timeframe, nor ignore the downwind impact of transported pollutants.

To demonstrate leadership in advancing regional emission reductions while encouraging strong national legislation or regulation for achieving multi-pollutant reductions, OTC supports the implementation of regional emission caps for nitrogen oxides and sulfur dioxide with concurrent emission reductions of mercury from power plants and large industrial boilers. The multi-pollutant principles adopted January 27, 2004 established the level of reductions needed from these sources as part of an overall attainment strategy for member states. The technical committees of the OTC are directed to develop mechanisms for implementing these emission limits including model rule development, coordinating legal actions, etc, and report back to the commission in the next three months. OTC should develop these mechanisms recognizing parallel efforts among states that address carbon dioxide and other greenhouse gases.