



**STATEMENT OF THE OZONE TRANSPORT COMMISSION AND MID-ATLANTIC/NORTHEAST VISIBILITY UNION REGARDING EXPEDITING THE UPDATE OF CONTROL TECHNIQUES GUIDELINES AND ALTERNATIVE CONTROL TECHNIQUES BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY**

Under principles of cooperative federalism, the Ozone Transport Commission (OTC) and Mid-Atlantic/Northeast Visibility Union (MANE-VU) call upon the U.S. Environmental Protection Agency (EPA) to work with us to reduce volatile organic compounds (VOCs) and nitrogen oxides (NOx) emitted from existing sources that contribute to ground-level ozone (smog) and visibility impairment (haze). To this end, OTC and MANE-VU request that EPA expedite updates to its Control Techniques Guidelines (CTGs) and Alternative Control Techniques (ACTs) for the improved control of VOCs and NOx. Many of these guidelines and techniques have not been updated in over 20 years and do not reflect current feasible approaches.

Updated guidelines and techniques will benefit ozone nonattainment areas across the country in meeting current and future ozone standards and will help improve visibility in national parks and wilderness areas. They will also help reduce air pollution, including air toxics and particulate matter, from existing sources in overburdened environmental justice communities.

To achieve the greatest early reductions, OTC and MANE-VU would like to work with EPA in identifying the highest priority source sectors for expedited updating of their CTGs and ACTs. Within the Ozone Transport Region, the Clean Air Act requires implementation of reasonably available control technology (RACT) in attainment and nonattainment areas. CTGs presumptively define VOC RACT, and ACTs provide air agencies with pertinent information on available and cost effective VOC and NOx control technologies that can inform RACT determinations for a diverse group of existing pollution sources. Updated ACTs will also provide upwind states with better information on achievable NOx control measures that can be incorporated state-wide into their good neighbor state implementation plans (SIPs) to reduce their downwind contributions to ozone pollution problems.

For all of the above reasons, OTC and MANE-VU call upon EPA to work with us in expeditiously prioritizing and updating CTGs and ACTs.

**Adopted by the Ozone Transport Commission and Mid-Atlantic/Northeast Visibility Union  
June 15, 2021**