



## Statement by the Ozone Transport Commission in Recognition of the Successful Committee Work Regarding Municipal Waste Combustors

The member States and the District of Columbia (the States) of the OTC recognize and appreciate the dedicated work of the Stationary and Area Sources (SAS) Committee, specifically its Municipal Waste Combustor (MWC) Workgroup, which has spent several years analyzing the potential for installing cost effective air pollution controls at MWCs. At the direction of the OTC, they have produced and updated information on the emissions reduction potential of nitrogen oxides (NOx) from MWCs in the Ozone Transport Region (OTR). This has led to a better understanding of this important source sector's contribution to regional ozone and has created a comprehensive view of the available control technologies to reduce NOx emissions from MWCs.

Based on initial findings of the MWC Workgroup and SAS Committee, in June 2022 the States signed a Memorandum of Understanding and committed "to work together to pursue additional NOx reductions from MWCs in the region."<sup>1</sup> Since that time, collaboration through the MWC Workgroup and SAS Committee has led to a greater understanding of the options for addressing pollution from this emissions source sector. The MWC Workgroup through the SAS Committee successfully completed its report on MWC NOx controls in May 2023.

Building upon that report, the OTC was well positioned when the opportunity arose to inform the U.S. Environmental Protection Agency (EPA) as it reviewed NOx reductions from this source sector. In January 2024, EPA proposed a national NOx limit for MWCs that is consistent with and supported by the findings of the OTC's work. The OTC commented to EPA in March 2024 that its proposal reflected "an achievable, cost-effective NOx emission limit for all existing large MWC units."<sup>2</sup>

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<sup>1</sup> Memorandum of Understanding Among the States of the Ozone Transport Commission to Pursue Additional Reductions of Oxides of Nitrogen Emissions from Municipal Waste Combustors, dated June 2, 2022, [https://otcair.org/upload/Documents/Formal%20Actions/MOU22-01%20OTC\\_MWC\\_MOU\\_20220602%20final%20signed.pdf](https://otcair.org/upload/Documents/Formal%20Actions/MOU22-01%20OTC_MWC_MOU_20220602%20final%20signed.pdf).

<sup>2</sup> Ozone Transport Commission comments to EPA, dated March 25, 2024, RE: Docket ID No. EPA-HQ-OAR-2017-0183, <https://otcair.org/upload/Documents/Correspondence/otc-lmwc-comments-to-epa-20240325.pdf>.

None of this would have been possible without the efforts of the MWC Workgroup and SAS Committee. We recognize and commend the groups' members for their dedication and insight in accomplishing the goal set out in the OTC's June 2022 MOU.

**Adopted by the Commission June 11, 2025**