

**OTC MEMORANDUM OF UNDERSTANDING ON THE NEED TO REDUCE
STATIONARY SOURCE NO_x EMISSIONS AND ACTIVITIES TO DEVELOP TECHNICAL
SUPPORT FOR REGULATORY DEVELOPMENT**

WHEREAS the ambient ozone nonattainment problem is pervasive across the northeastern United States; and

WHEREAS the Clean Air Act Amendments of 1990 require NO_x Reasonably Available Control Technology (RACT) control regulations in the Ozone Transport Region (OTR) be submitted in SIP revisions by November 15, 1992, with compliance no later than May 1995; and

WHEREAS the Clean Air Act Amendments of 1990 also require SIP revisions including an ozone attainment demonstration be submitted by November 15, 1994, with compliance dates no later than May 1999; and

WHEREAS parts of the OTR have attainment dates as early as 1996 and 1999; and

WHEREAS the December 1991 report on urban ozone by the National Academy of Sciences concluded that there is a need for NO_x control in many of the urban areas of the U.S.; and

WHEREAS the modeling simulations performed to date by the U.S. Environmental Protection Agency using the Regional Oxidant Model (ROM) demonstrate the efficacy of NO_x control for reducing ozone formation in the OTR; and

WHEREAS there are significant contributions to NO_x emissions from both stationary and mobile sources; and

WHEREAS reasonable controls on both stationary and mobile sources of NO_x will be necessary for the long-term attainment and maintenance of the ambient ozone standards; and

WHEREAS the OTC has already acted to endorse mobile source control strategies which will reduce the mobile source NO_x emission contribution; and

WHEREAS studies by EPA and others have shown that combustion modifications are available and have the potential to provide cost effective NO_x emissions reductions at stationary fuel combustion sources; and

WHEREAS additional add-on control technology beyond combustion modifications will be necessary to ensure attainment of the ozone standard in the OTR;

THEREFORE, be it resolved that each of the undersigned member states will proceed with the development of regulations related to RACT requirements based on combustion modifications for significant stationary source categories of NO_x for implementation by May 1995; and

Furthermore, that the OTC should in cooperation with the U.S. Environmental Protection Agency continue modeling simulations using ROM and the Urban Airshed Model to investigate the additional amount of NOx reduction necessary to provide attainment of the ambient ozone standard across the OTR; and

Furthermore, additional controls capable of meeting a performance standard based on advanced control technology will be incorporated in 1994 SIP revisions for implementation by May 1999, as needed to attain and maintain the ambient standard for ozone throughout the OTR.

Signed this 10th day of March, 1992

by the following:

CONNECTICUT:

Timothy R. E. Kurny

DELAWARE:

Edwin H. Clark, Jr.

DISTRICT OF COLUMBIA:

Ferial A. Bishop

MAINE:

Dean C. Manis

MARYLAND:

Bob Pericasepe

MASSACHUSETTS:

Susan J. Hervey

NEW HAMPSHIRE:

Robert W. Vandy

NEW JERSEY:

Spencer A. Werner

NEW YORK:

Thomas J. Jolly

PENNSYLVANIA:

Catherine W. Cowan

RHODE ISLAND:

Louise Trujillo

VERMONT:

Jan A. Eastman

VIRGINIA:

Elizabeth H. Haskell