



**Resolution of the Ozone Transport Commission  
on Developing a Recommendation for Emissions Reductions from  
Municipal Waste Combustors**

**Whereas** the Ozone Transport Commission (OTC) was established under Sections 176A and 184 of the federal Clean Air Act (CAA) to ensure the development and implementation of regional strategies to reduce ground-level ozone to healthy levels;

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Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

**Whereas** the adverse health effects of ground-level ozone are well documented, and despite significant reductions of ozone precursor emissions achieved to date, approximately 30 million residents of the Ozone Transport Region (OTR) continue to be exposed to unhealthy levels of ozone air pollution;

**Whereas** since its formation in 1991, the OTC has developed considerable policy and technical expertise on ozone policy, implementation of ozone control strategies, opportunities to enhance economic development and job creation, air pollution control technology and the science of ground level ozone formation;

**Whereas** the research and modeling conducted by OTC and the OTC states show that the most important and timely strategy for continued progress on reducing ground-level ozone throughout the OTR is the reduction of oxides of nitrogen (NO<sub>x</sub>) emissions through regional actions by the OTC states and by states that significantly contribute to ozone in the OTR, and federal actions;

**Whereas** current technical analysis completed by OTC shows that municipal waste combustors contribute over 22,000 tons of NO<sub>x</sub> emissions in the OTR annually;

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Paul J. Miller  
Executive Director

**Whereas** approximately 60 municipal waste combustors are in operation in states outside of the OTR that can be contributing to ozone pollution in the OTR;

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**Whereas** states in the OTR have established daily, monthly, and annual limits on NO<sub>x</sub> emissions from municipal waste combustors;

**Whereas** municipal waste combustor emissions located in overburdened environmental justice communities may disproportionately impact their host communities; and

**Whereas** a recent OTC technical analysis shows that additional NOx controls are technically feasible and cost effective for most municipal waste combustors in the OTR;

**Therefore, be it resolved** that the members of the OTC commit to working together in using the recent OTC technical analysis to develop regional and national recommendations on more stringent NOx emissions reductions for municipal waste combustors;

**Furthermore**, the OTC commits to collaborating with the U.S. Environmental Protection Agency (EPA) to evaluate national strategies to achieve reductions from municipal waste combustors;

**Furthermore**, the OTC shall engage in a public process to obtain input and comment from interested parties in developing recommendations on more stringent NOx emissions reductions for municipal waste combustors; and

**Furthermore**, upon completion of the public process, the OTC shall draft a Memorandum of Understanding containing the recommendations on municipal waste combustor NOx emission reduction measures for consideration on an expedited basis by the OTC membership.

Adopted by the Commission on June 15, 2021

  
Terrence Gray, OTC Chair