



Statement of Reasonably Available Control Technology Principles

The Ozone Transport Commission (OTC) is a multi-state organization created under the Clean Air Act (CAA) to advise the U.S. Environmental Protection Agency (EPA) on practical and cost effective solutions to the environmental and public health problem of ground-level ozone transport that negatively affects the Ozone Transport Region (OTR).

Ozone has been shown to cause respiratory illnesses, exacerbate or trigger asthma related episodes, increase respiratory-related emergency room and hospital admissions and compromise the immune system leading to increased incidents of other respiratory illnesses, including pneumonia and bronchitis, and to cause premature death.

In 2014, each OTC state is required under Section 184 of the Clean Air Act to perform a review of the state's control requirements to ensure that all major sources of NO_x and VOC are subject to a RACT (or Reasonably Available Control Technology) level of control under the 2008 national ambient air quality standard (NAAQS) for ozone. OTC's Stationary and Area Sources Committee has conducted extensive analysis of largest contributing sources inside and outside of the region published in a whitepaper. EPA has defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. Over time, RACT changes to reflect advances in technology, becoming more stringent as the NAAQS are revised and lowered. In order to protect the public adequately from the adverse health effects associated with ozone and ensure consistency, the OTC recommends the following minimum principles for RACT to assist in attainment and maintenance of the ozone NAAQS:

1. Consistent with EPA guidance, levels of control, and emissions rates, that are achieved in practice by existing similar sources are technologically and economically feasible, considering capacity, fuel, equipment design, control technology, age and site limitations, and therefore represent RACT. Thus, requirements in place in other states for certain sources provide a benchmark for RACT for that source category.
2. Sources that have purchased and installed pollution control technology must run those technologies year round and ensure that, during the ozone season, daily emissions are minimized.
3. For electricity generating units:
 - a. Compliance with the Cross-State Air Pollution Rule or the Clean Air

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

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Interstate Rule cannot substitute for RACT.

- b.** Peaking units need to be assessed with due consideration given to total daily emissions from the category of sources and the economics of meeting peak demands.
- 4. The averaging time for a RACT-based emission limitation should be as short as practicably consistent with the ozone standard and characteristic operation of the source category.

Therefore, the OTC member states strongly believe that the implementation of the aforementioned RACT core principles will strengthen emissions limitations, lower overall emissions, and thereby derive air quality and public health benefits.

Abstained: New Hampshire ,Pennsylvania, Virginia

Adopted by the Commission on June 11, 2014



Robert M. Summers, OTC Chair
Secretary, Maryland Department of Environmental Protection