

**OZONE  
TRANSPORT  
COMMISSION**

**Statement Requesting EPA to Update the National Architectural and Industrial Maintenance Rule**

The Ozone Transport Commission (OTC), a multi-state organization created under the Clean Air Act (CAA), is required to advise the U.S. Environmental Protection Agency (EPA) on practical and cost effective solutions, based on sound science, to the environmental and public health problem of ground-level ozone transport that negatively impacts the Northeast and Mid-Atlantic regions.

Connecticut

Delaware

District of Columbia

Maine

Maryland

Massachusetts

New Hampshire

New Jersey

New York

Pennsylvania

Rhode Island

Vermont

Virginia

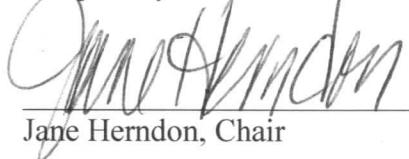
Ozone is a significant health threat. It is known to cause respiratory illnesses, exacerbate or trigger asthma related episodes, increase respiratory-related emergency room and hospital admissions and compromise the immune system leading to increased incidents of other respiratory illnesses, including pneumonia and bronchitis, and to cause premature death.

The OTC states have developed, adopted, and implemented measures to reduce NO<sub>x</sub> and VOC emissions. The OTC states have developed an updated Architectural and Industrial Maintenance Model Rule (Model Rule). Although the member states pursue control measures at the state and regional level, some control measures may be implemented more effectively on a national level.

EPA architectural and industrial maintenance coatings regulations have not been updated since 1998.

The OTC member states recommend that EPA use the Model Rule as a starting point for evaluating and updating its regulations.

Adopted by the Commission on June 4, 2015

  
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