



**OZONE  
TRANSPORT  
COMMISSION**

**Statement Requesting EPA to Adopt the Ozone Transport Commission  
Consumer Product Model Rule and the Architectural and Industrial  
Maintenance Model Rule as National Rules**

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.

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 continue to demonstrate leadership in NO<sub>x</sub> and VOC reductions by adopting and implementing measures to reduce emissions of ozone precursors through its Consumer Products Model Rule, most recently updated in the spring of 2013 and the Architectural and Industrial Maintenance Model Rule (Model Rules) most recently updated in the summer of 2011. Although the member states pursue control measures at the state and regional level, in several instances, control measures are truly best implemented on a national level.

EPA has not updated national consumer products or architectural and industrial maintenance coatings regulations since 1998. The OTC recommends EPA use the Model Rules as a starting point for updating national standards to technological advancements in these sectors that have occurred over the course of the past fifteen years.

OTC has recommended this action to EPA on prior occasions, most recently in November 2009 (Statement From OTC Calling on the US Environmental Protection Agency to Adopt and Implement Additional National Rules to Reduce Ozone Transport and Protect Public Health) and 2007 (Statement on the Need For National Rulemaking and Implementation of Ozone Control Measures).

A number of Consumer Products organizations also support updating national standards for consumer products.

Therefore, the OTC member states once more call upon EPA to revise and update the federal regulations to reflect controls equivalent to the OTC Consumer Products Model Rule and the Architectural and Industrial Maintenance Model Rule or a program of comparable control measures at cost-effective and technically achievable levels.

Adopted by the Commission on June 13, 2013

  
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