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TRANSPORT  
COMMISSION**

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**Statement of Principles by the Ozone Transport Commission Regarding the Environmental Protection Agency's Consideration of Implementing the Clean Air Act's Section 110(a)(2)(D) Good Neighbor Provisions.**

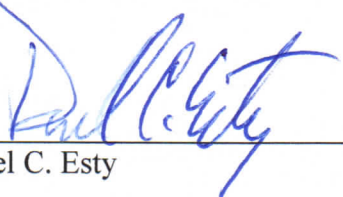
The Ozone Transport Commission (OTC), a multi-state organization created under the Clean Air Act (CAA), is required to advise the U.S. Environmental Protection Agency (EPA) on practical and cost effective solutions, based on sound science, to the environmental and public health problem of ground-level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

The OTC member states participated in EPA's stakeholder meetings concerning the transport of air pollution across state boundaries. We applaud EPA for initiating this process. While the OTC member states recognize the complexity of the task before EPA given the *Homer City* decision, we offer the following principles to guide EPA's efforts:

- EPA should provide each State with an emission budget that, at a minimum, includes an ozone season budget that is complemented by a peak day budget. Recognizing technical limitations within States, EPA should not require States to complete individual modeling as it will prove too complex, costly and lack consistency.
- EPA must conclude this process with all due haste, as instructed by the US District Court, in order to address the public health impacts of transport and allow for timely compliance with the 2008 ozone national ambient air quality standards (NAAQS).
- The states and EPA shall work collaboratively to maintain open communications through this process on both policy and technical issues so as to fully benefit from each party's unique knowledge and perspective with respect to their sources and individual challenges.
- Any proposed transport solution generated through the EPA process must allow for an alternative states-driven process, provided the outcome fully alleviates all significant impacts of interstate air pollution transport within the same timeframe established through the EPA process.
- Any proposed transport solution generated through this process should be based on the most recent available air quality data from 2010 - 2012. While EPA has identified 2011 as the likely base year inventory, EPA must recognize that completing this inventory will require maximum state input to arrive at a high quality result within the time allotted.

- Any proposed transport solution generated through this process must recognize, and not penalize, early progress made by States in reducing ozone precursor emissions.
- Any proposed transport solution generated through this process must recognize the limitations faced by States in controlling mobile source emissions.
- Any proposed transport solution should provide the legally required flexibility for states to develop SIP revisions to achieve assigned emission budgets as they see fit, but should also include a structure of federal accountability to be automatically implemented if a state does not submit a fully responsive SIP revision on time.

Adopted by the Commission on June 13, 2013



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Daniel C. Esty