

OTC SAS Committee Update

OTC/MANEVU Virtual Public Stakeholder Webinar

October 9, 2026

Stationary and Area Sources Committee

Chair, Frank Steitz, New Jersey DEP



OZONE TRANSPORT COMMISSION

Presentation Overview

SAS 2026 Charge approved by Commissioners at June 2, 2026 annual meeting

- ✓ Assess Source Emissions Inventory
- ✓ Provide Technical Support for Individual Sectors
- ✓ Cross Committee Collaboration
- ✓ EPA Office of State Air Programs (OSAP) Engagement

Additional Updates

- ✓ Tracking model rule adoption
- ✓ Input on 2026 charge
- ✓ Annual summary of SAS work

Assess Source Emissions Inventory

- Awaiting release of NEI 2023
- State members participating in 2022 Emission Collaborative workgroups on projection emissions for 2032 (oil and gas, EGU and industrial point, nonpoint)
- Received update on NESCAUM Buildings Team work on commercial building inventory and emissions

Technical Support on Sectors

Update on heat pump applications for <50 MMBtu/hr:

- Expecting an update from NESCAUM Buildings Team on industrial heat pump project, including specific case studies
- Will consider re-initializing workgroup following briefing

Technical Support on Sectors: behind-the-meter generation

- Current OTC work on this sector is 10-15 years old, with the last Model Rule on Stationary Generators published in 2010.
- 2026 Charge item to update this work.
- Workgroup convened in summer 2026.
- Work to date has included:
 - Drafting workplan,
 - Comparing permitting and regulations of back-up and emergency generators,
 - Summarizing existing NEI inventory from the 2020 NEI and 2022v1 emissions modeling platform, and
 - Collected most states' submissions to spring 2026 EIA request for back-up generators at data centers.

Technical Support on Sectors: behind-the-meter generation

State	2020 NEI	2022v1, 2022 Final	2022v1, 2026 Final
CT	560	657	469
DC	48	42	41
DE	334	216	217
MA	1,930	2,300	1,725
MD	763	919	912
ME	5,191	5,544	3,741
NH	430	430	308
NJ	557	649	623
NY	6,858	7,325	6,624
PA	8,006	9,267	8,649
RI	212	256	274
VA	2,400	2,190	2,225
VT	960	1,031	693
Total	28,249	30,826	26,501

- Table compiled with list of SCCs related to internal combustion engines in point and nonpoint categories (list available upon request).
- Forthcoming work will seek to build a “bottom up” inventory to “truth” the emissions from these inventories.
- Challenges include accessing information on these units, including size and operation time, particularly in cases where emergency generators are not permitted.

Engine emission standards

Small engines, 130-560 kW

	NOx
Tier 2	6.0 g/kWh (4.47 g/bhp-hr)
Tier 3	4.0 g/kWh (2.98 g/bhp-hr)
Tier 4	0.40 g/kWh (0.30 g/bhp-hr)

Large engines, >560 kW

	NOx
Tier 2	6.4 g/kWh (4.77 g/bhp-hr)
Tier 3	4.0 g/kWh (2.98 g/bhp-hr)
Tier 4	0.67 g/kWh (0.50 g/bhp-hr)

- Virginia recently implemented a rule where all new emergency generators installed at data centers must meet Tier 4 standards.
- Tier 4 emission limits are 90% lower than Tier 2.

Cross Committee Collaboration

Update/Next Steps:

- Continue working on behind the meter generation workgroup.
- Review the 2023 NEI and compare with earlier inventories for key changes in SAS sectors.
- Keep an “open-door policy” with Modeling, Mobile Sources, and the MANEVU TSC for when we have data or overlapping requests.

Engagement with OSAP

Update/Next Steps:

- EPA staff invited to SAS calls and occasionally attend
- Waiting to hear back on an invitation sent to EPA to share information on federal regulations for emergency generators on the Back-up Generators Workgroup

Other Updates

- OTC Model Rule Tracker updated in June
- Annual Summary of prior year SAS work in review with committee

Thank You!

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Bonus Slides

SCCs for back-up generator inventory work

Category	SCC	Description
Point	20100102	Electric utility, distillate
	20100107	Electric utility, distillate, exhaust
	20100202	Electric utility, natural gas
	20100207	Electric utility, natural gas, exhaust
	20100702	Electric utility, process gas
	20100707	Electric utility, process gas, exhaust
	20100802	Electric utility, landfill gas
	20100807	Electric utility, landfill gas, exhaust
	20100902	Electric utility, kerosene
	20100907	Electric utility, kerosene, exhaust
	20200102	Industrial, distillate
	20200107	Industrial, distillate, exhaust
	20200202	Industrial, natural gas
	20200207	Industrial, natural gas, exhaust
	20200251	Industrial, natural gas, 2-cycle Rich Burn
	20200252	Industrial, natural gas, 2-cycle Lean Burn
	20200253	Industrial, natural gas, 4-cycle Rich Burn
	20200254	Industrial, natural gas, 4-cycle Lean Burn
	20200255	Industrial, natural gas, 2-cycle Clean Burn
	20200256	Industrial, natural gas, 4-cycle Clean Burn
	20200401	Industrial, Diesel: Large Bore Engine
	20200402	Industrial, Dual Fuel (Oil/Gas): Large Bore Engine
	20200403	Industrial, Dual Fuel: Large Bore Engine: Cogeneration
	20200407	Industrial, Large Bore Engine: Exhaust

Category	SCC	Description
Point	20200501	Industrial, residual
	20200507	Industrial, residual, exhaust
	20200702	Industrial, process gas
	20200706	Industrial, refinery gas
	20200712	Industrial, process gas, exhaust
	20200902	Industrial, kerosene
	20200907	Industrial, kerosene, exhaust
	20201002	Industrial, LPG, butane
	20201007	Industrial, LPG, butane, exhaust
	20201012	Industrial, LPG
	20201014	Industrial, LPG, cogeneration
	20201602	Industrial, methanol
	20201607	Industrial, methanol, exhaust
	20201702	Industrial, gasoline
	20201707	Industrial, gasoline, exhaust
	20300101	C/I, distillate
	20300107	C/I, distillate, exhaust
	20300201	C/I, natural gas
	20300204	C/I, natural gas, cogeneration
	20300207	C/I, natural gas, exhaust
	20300301	C/I, gasoline
	20300307	C/I, gasoline, exhaust
	20300401	C/I, diesel, large bore engine
	20300702	C/I, digester gas
	20300707	C/I, digester gas, exhaust
	20300802	C/I, landfill gas
	20300807	C/I, landfill gas, exhaust
	20301001	C/I, LPG, propane
	20301002	C/I, LPG, butane
	20301007	C/I, LPG, exhaust
Nonpoint	2102004002	Industrial, distillate