

Past Successes and Future Challenges for Ozone and Visibility Planning

OTC Executive Director Report

June 11, 2025

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Presentation Outline

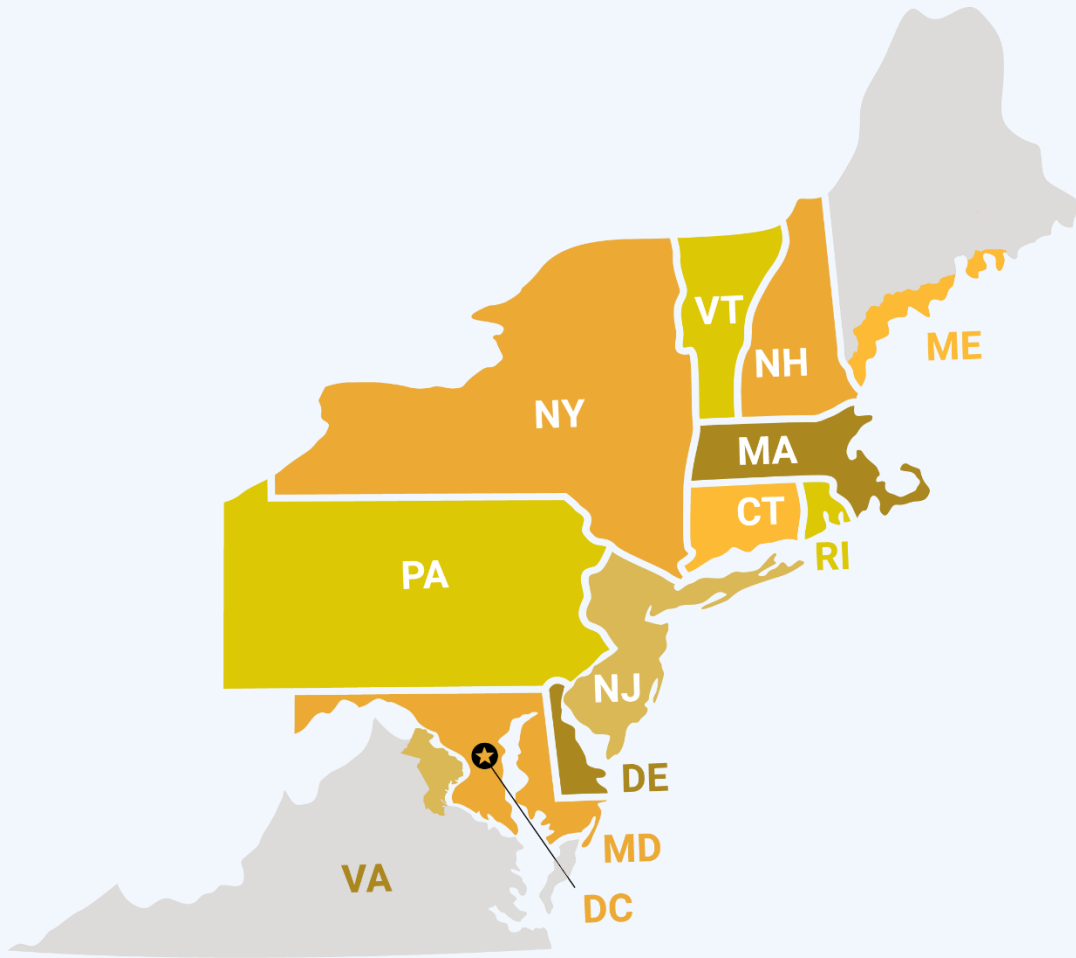
1. OTC & MANEVU overviews

- a. Origins and operations
- b. Accomplishments

2. Future Challenges

- a. Stalled progress
- b. Lack of state authority and new uncertainty for future pollution reduction measures
- c. Diminished scientific research on a changing atmosphere
- d. No funding

What is the OTC?



OTC is both the states and EPA

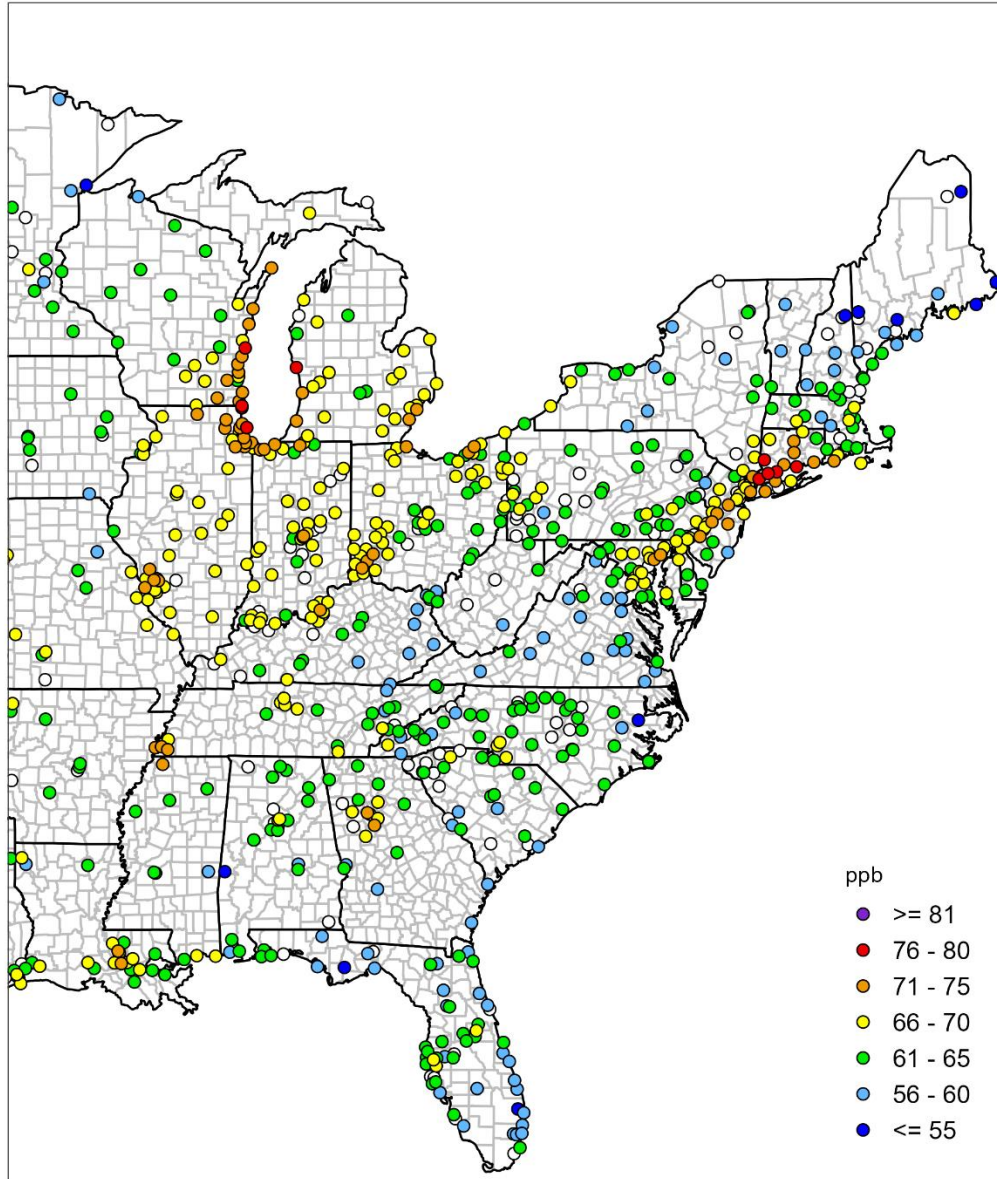
- 13 jurisdictions with 2 members each (governor's designee and air pollution official)
- EPA administrator or designee (non-voting)
- EPA regional administrators from Regions 1, 2, & 3 (non-voting)

Origins of Ozone Transport Commission

- Evolving understanding in the 1980s about how ozone was formed and transported on a regional scale.
- States were not well positioned to coordinate regionally in light of the evolving science.
- Addressed in Clean Air Act (CAA) 1990 Amendments.
 - Section 176A provided for creating “Interstate Transport Commissions.”
 - Section 184 explicitly created the OTC to address regional ozone.
- States work with each other, and with EPA, to control ozone in ways one state acting alone cannot.

OTC Operations

2022-2024 Ozone Design Values



Data source: <https://www.epa.gov/air-trends/air-quality-design-values>, 06/04/2025

- Managed under contract by NESCAUM since 12/2019
- Promotes regional cooperation and consistency through state collaboration
- Creates technical support documents for pollution control measures
- Comments on EPA proposed rules relevant to ozone
- Develops model rules, resolutions, statements, etc. through consensus-based approach

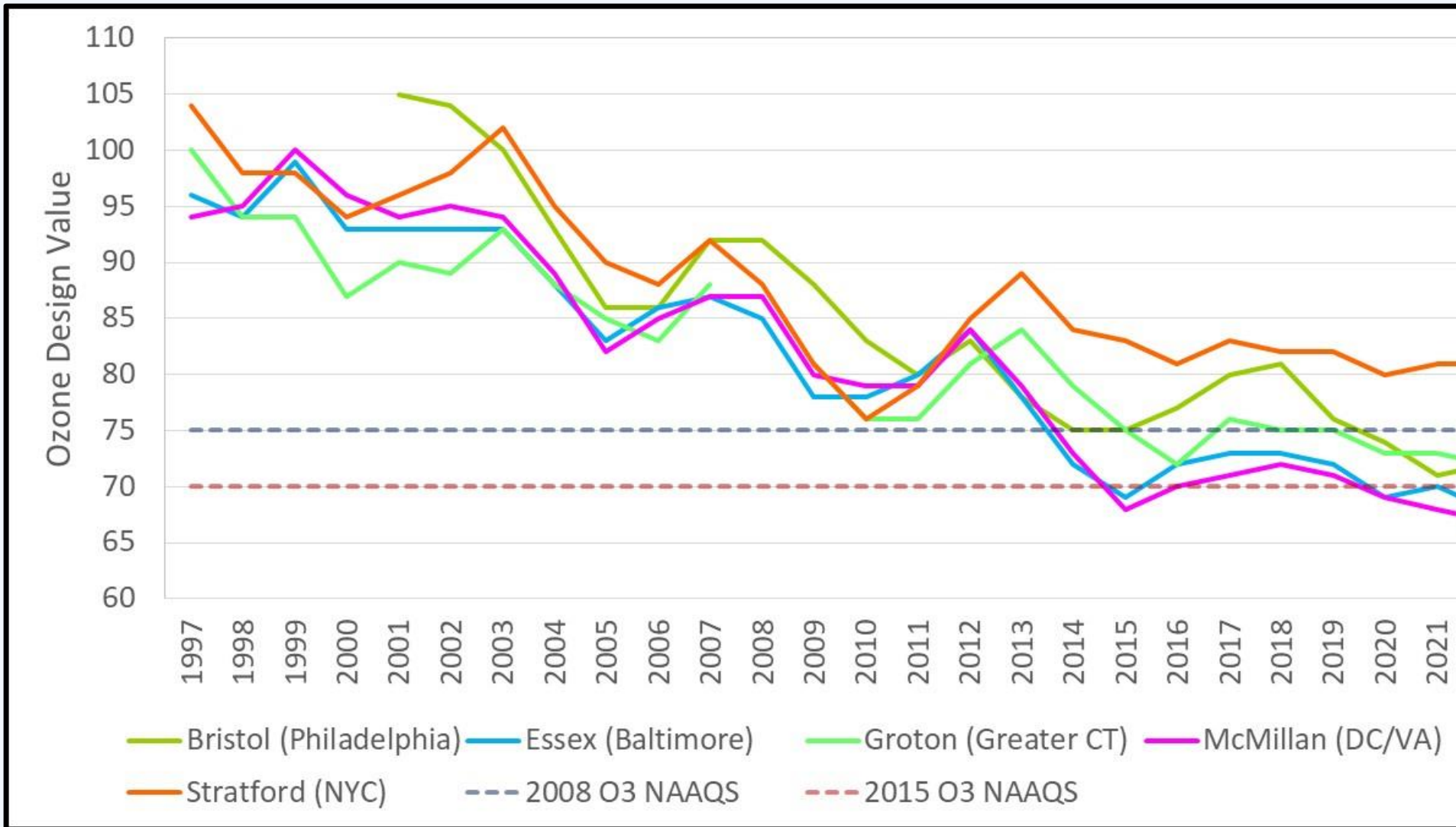
OTC Funding

- OTC funding authorized under CAA §106
 - Collaboratively funded by EPA, states, and DC
 - Funding has remained flat for years

Examples of OTC Collaboration Products

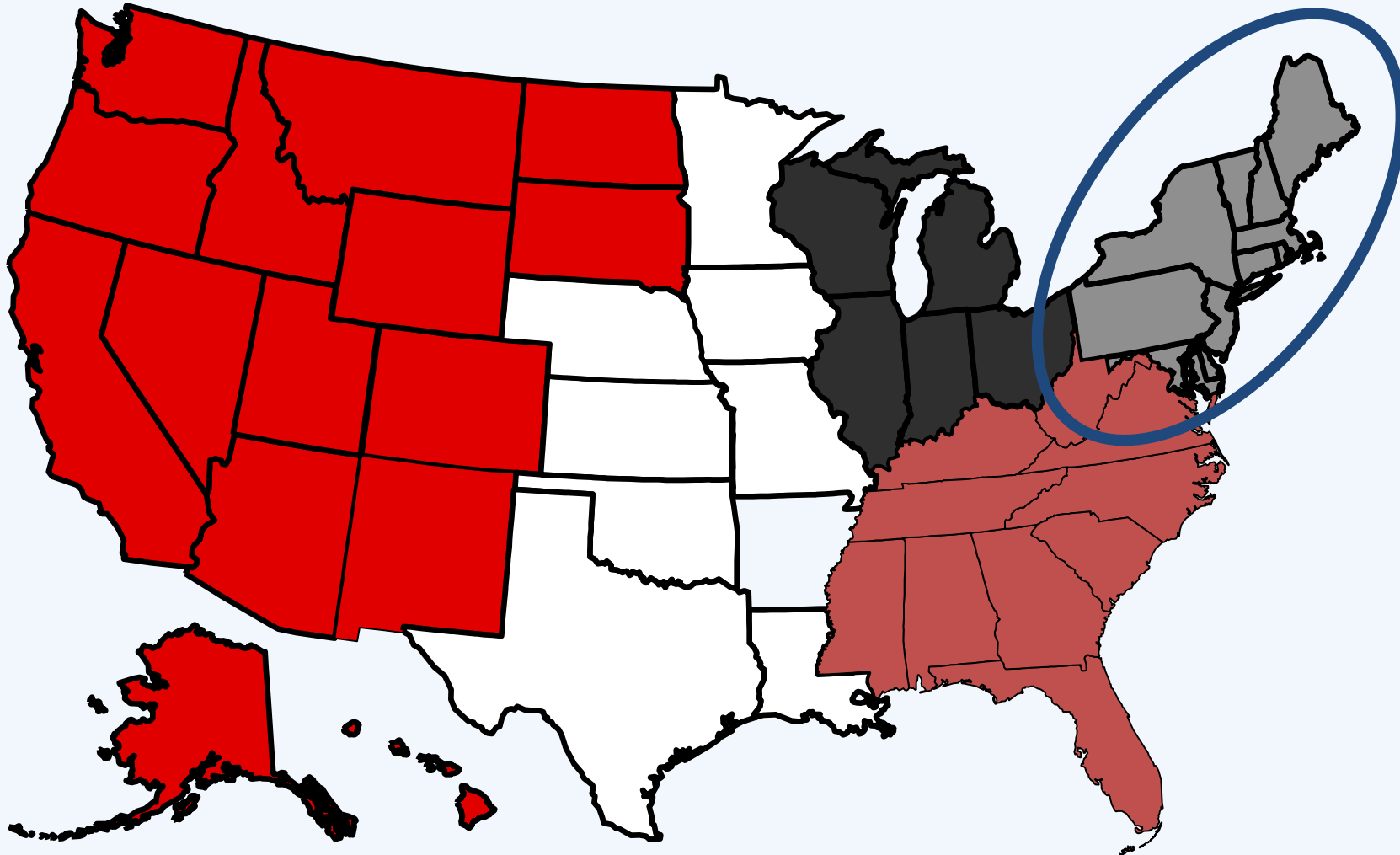
1. Assessments of pollution reduction strategies
 - a. Residential heat pumps assessment
 - b. Municipal waste combustor report
 - c. Heavy-duty vehicle inspection and maintenance program best practices
2. Model Rules and technical support documents (TSDs)
 - a. Air quality modeling TSDs
 - b. Model rules with TSDs
 - c. Health benefits assessments
3. Public *et al.* information resources
 - a. *RACT and Control Measures Tool*
 - b. *Status of Adoption of OTC Model Rules/Regulatory & Technical Guidelines*
4. Many other activities and examples – see <https://otcair.org/> under “Materials”

Success: Highest Ozone Levels Decreased over Time



Mid-Atlantic/Northeast Visibility Union (MANEVU)

What is MANEVU?



MANEVU is a regional planning organization to improve visibility.

Members are 12 states, DC, 2 Tribal Nations, EPA, & FLMs.

Origins of Mid-Atlantic/Northeast Visibility Union

- Formed in 2001 by resolution of member states & DC
- MANEVU voting members
 - CT, DE, DC, ME, MD, MA, NH, NJ, NY, PA, RI, VT
 - St. Regis Mohawk Tribe, Penobscot Nation
- MANEVU non-voting members
 - EPA
 - Federal Land Managers – NPS, USFWS, USFS
- OTC, MARAMA, & NESCAUM provide facilitation and technical support

MANEVU Operations

- NESCAUM manages MANEVU through its OTC contract
- MARAMA supports inventory work
- Voting members approve annual workplans
- Technical Support Committee and *ad hoc* workgroups implement workplan elements
- States & DC fund MANEVU separately from OTC, typically through their federal air quality management grants (i.e., STAG)

What does MANEVU do?

Fosters coordinated regional approaches to improve visibility at federally-protected national parks and wilderness areas in MANEVU region

Acadia National Park

We want fewer days like this ...

... and more days like this.

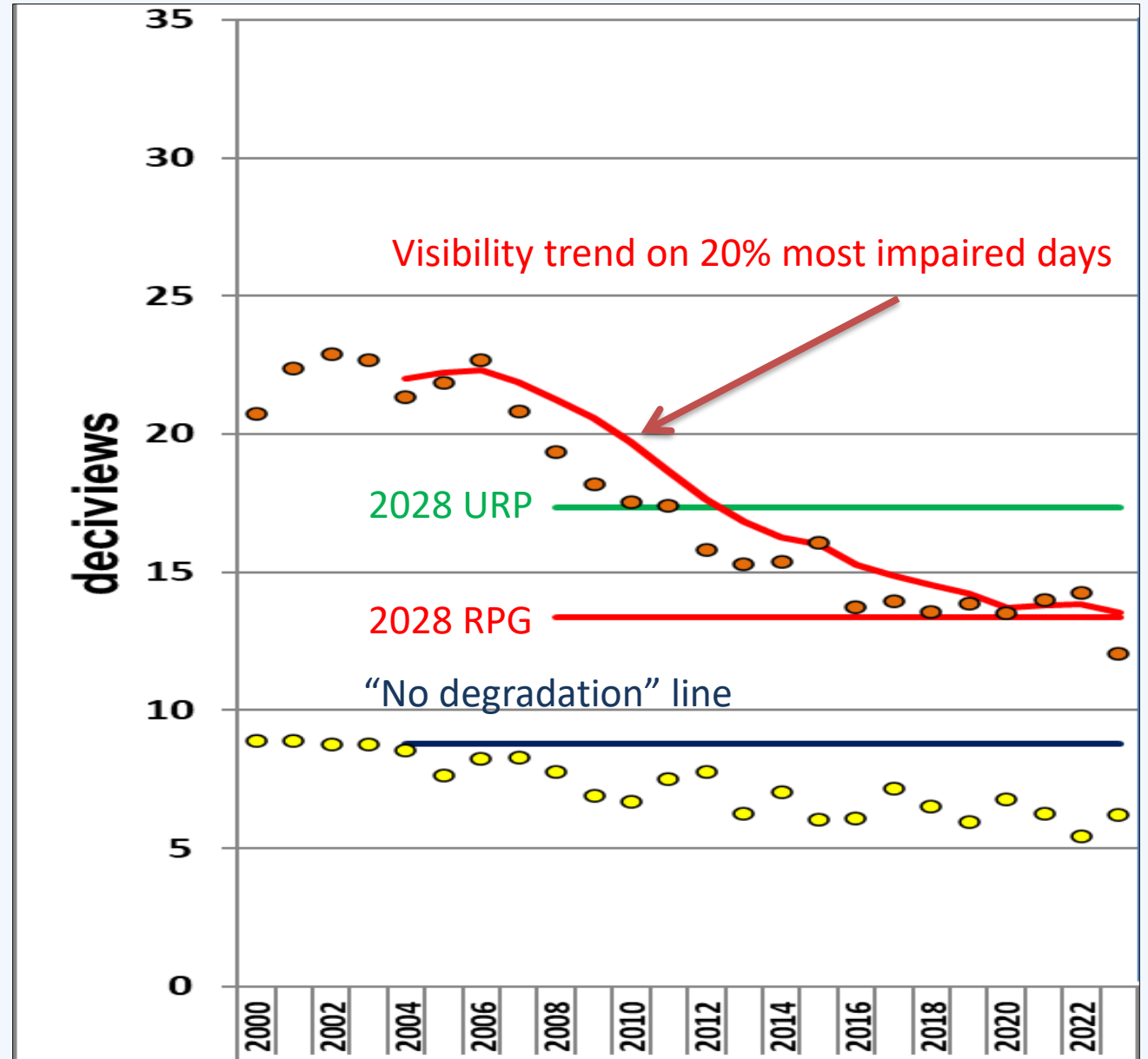
MANEVU Recent & On-going Accomplishments

1. Regional approaches and technical analyses for haze SIP long-term strategies, with successful EPA approval track record for the 2nd implementation period
2. Annual reports tracking visibility progress
3. “MANEVU Asks” for MANEVU members, upwind states, and EPA
4. Standard MANEVU templates for reasonable progress reports
5. Conceptual model of regional haze and how the nature of haze has changed over the years for use in members’ haze SIPs
6. Consensus comments on haze SIPs within and outside the MANEVU region
7. Many other activities in support of members’ needs – see <https://otcair.org/manevu> under “Materials”

Visibility Has Improved over Time

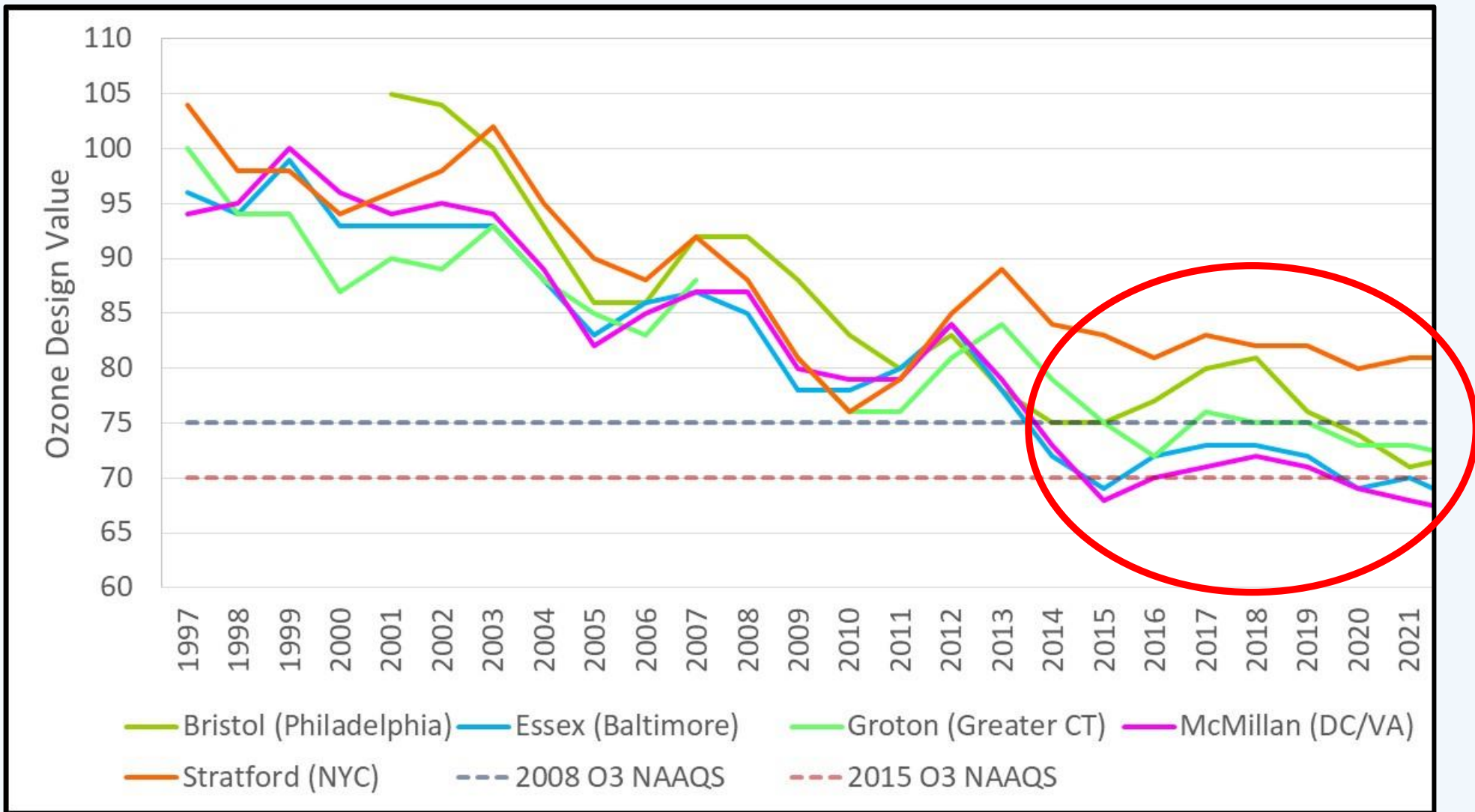
Acadia National Park
visibility trends 2000-2023

Lower deciviews =
better visibility

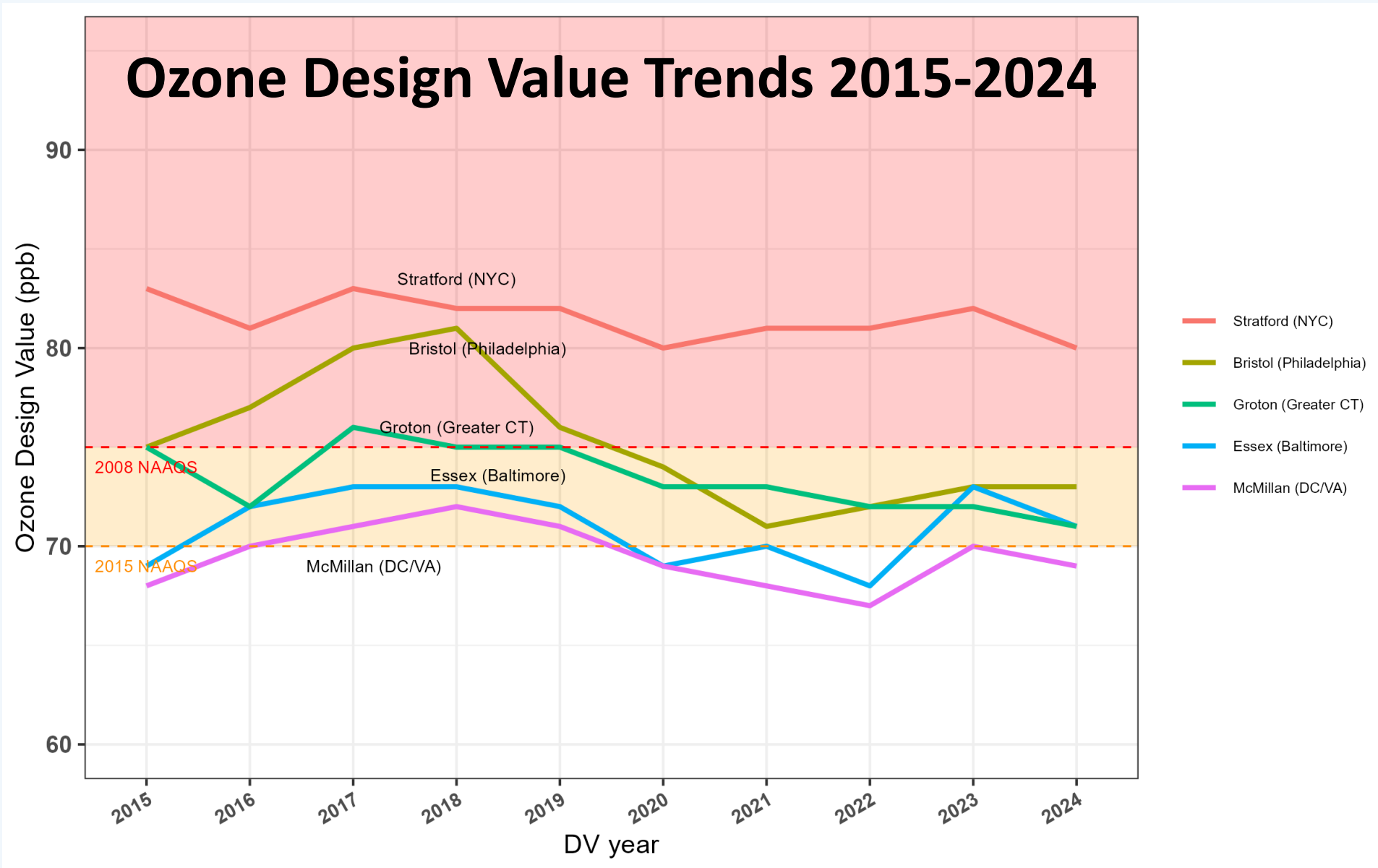


OTC & MANEVU Future Challenges

Ozone Trends Have Flattened



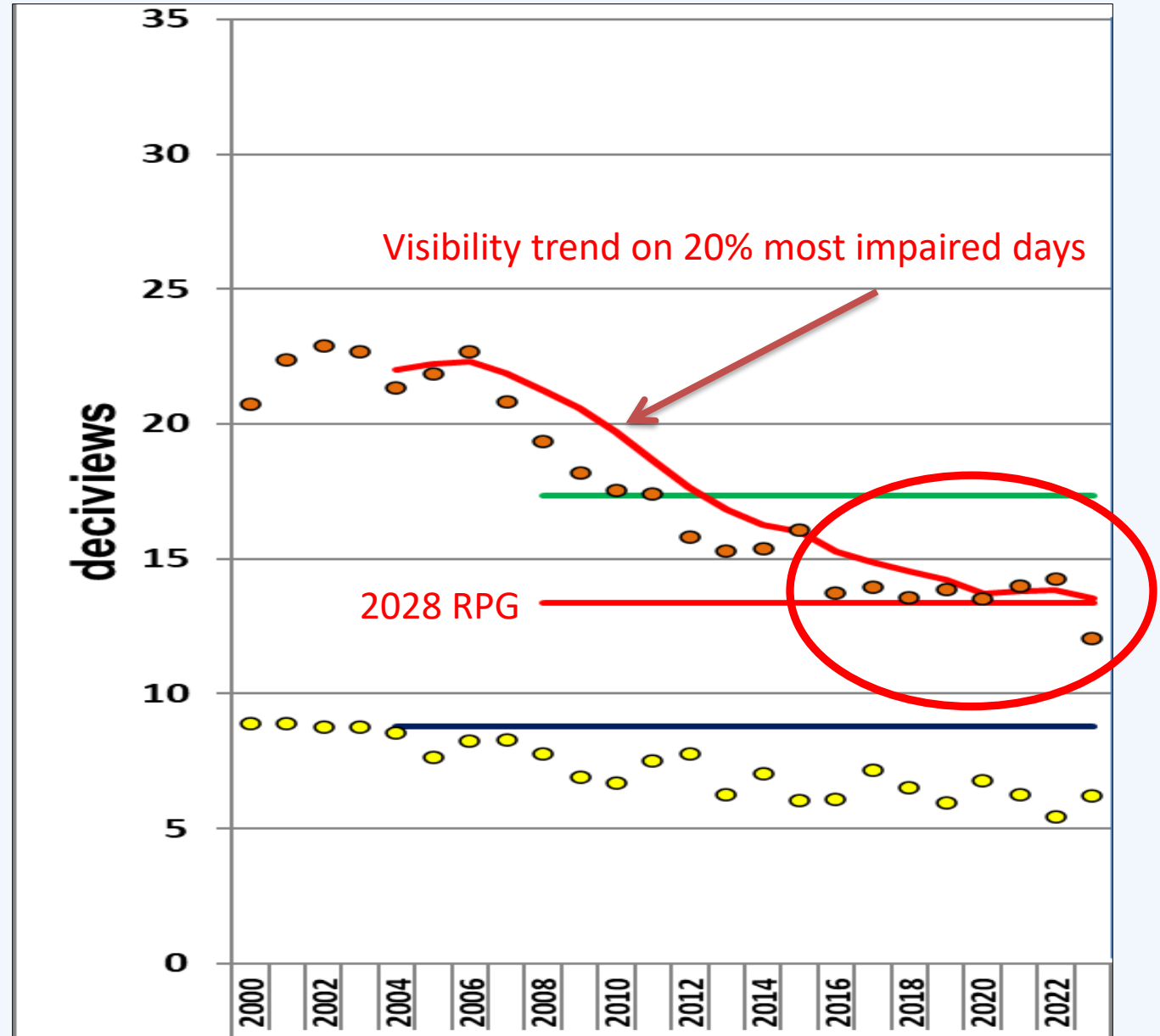
Flat Trends Continue through 2024



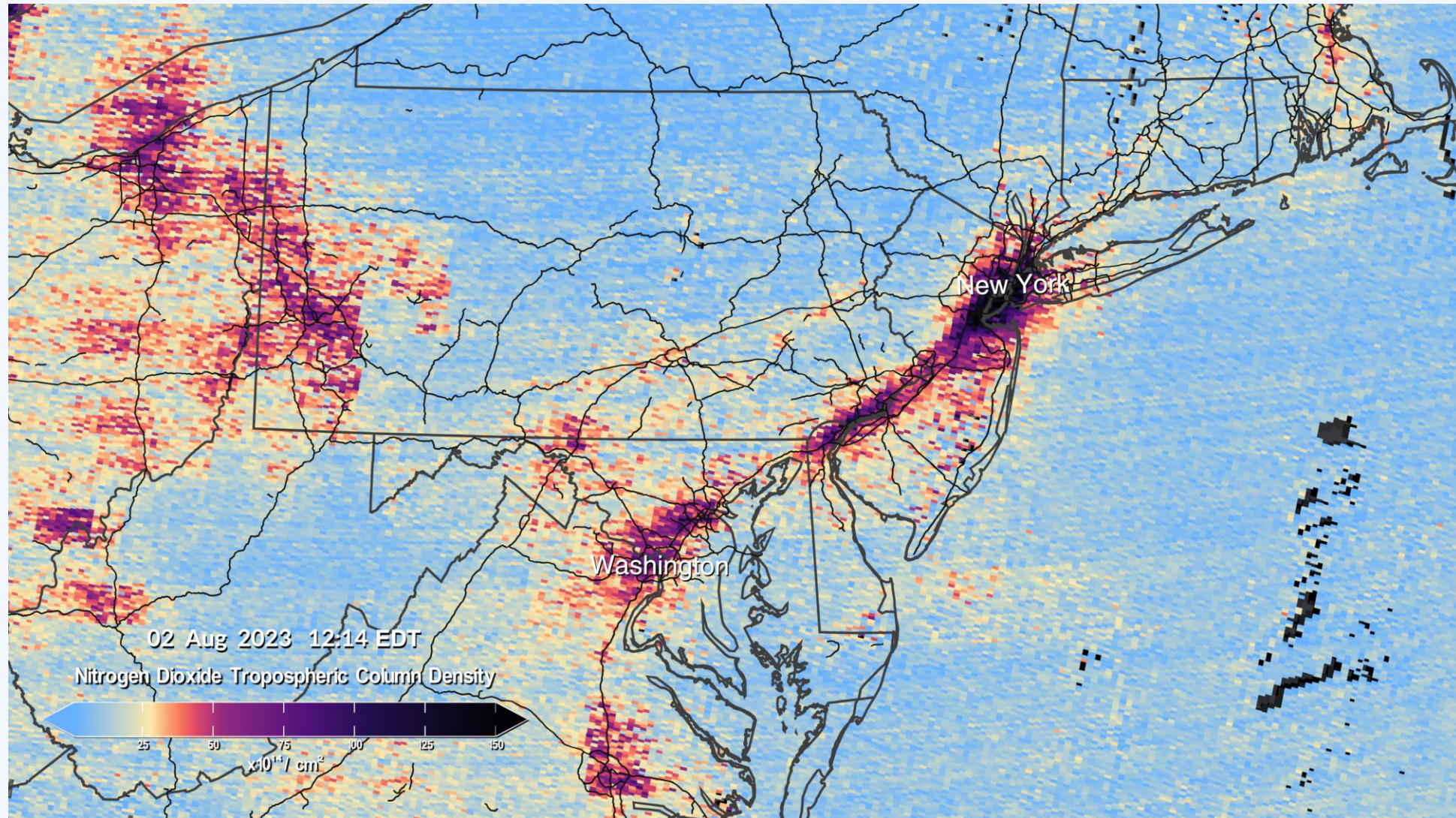
Visibility Improvement Trends Have Flattened

Acadia National Park
visibility trends 2000-2023

Lower deciview value =
better visibility



OTC/Northeast Corridor High NO_x Emissions



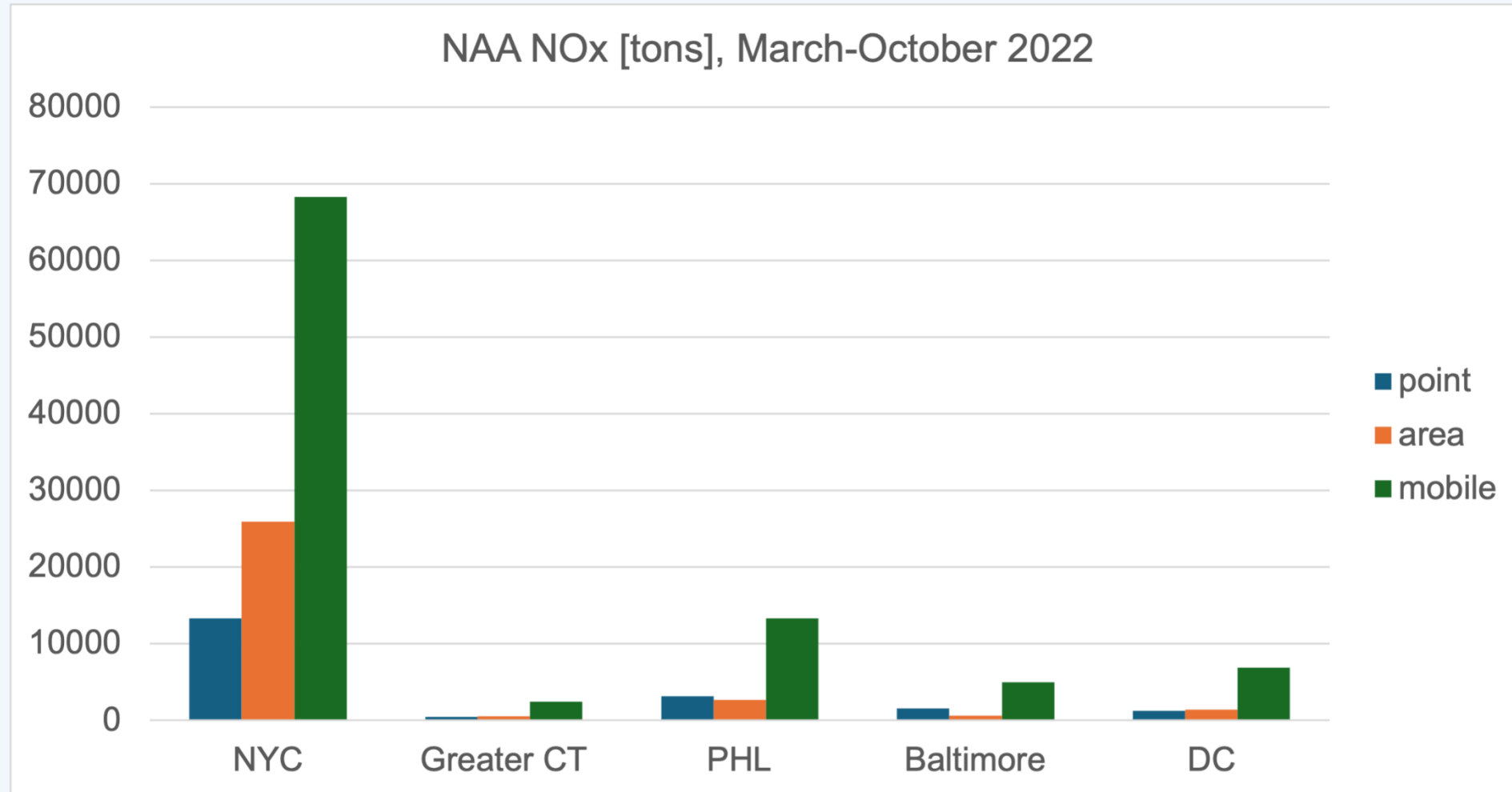
NOx Emissions Sectors & Federal Responsibility

“Mobile” sources of NOx dominate inventory in ozone nonattainment areas.

It includes onroad, offroad, rail, marine vessels, airports, and lawn & garden equipment.

States are pre-empted from controlling many of these sources and there’s now uncertainty about onroad vehicles.

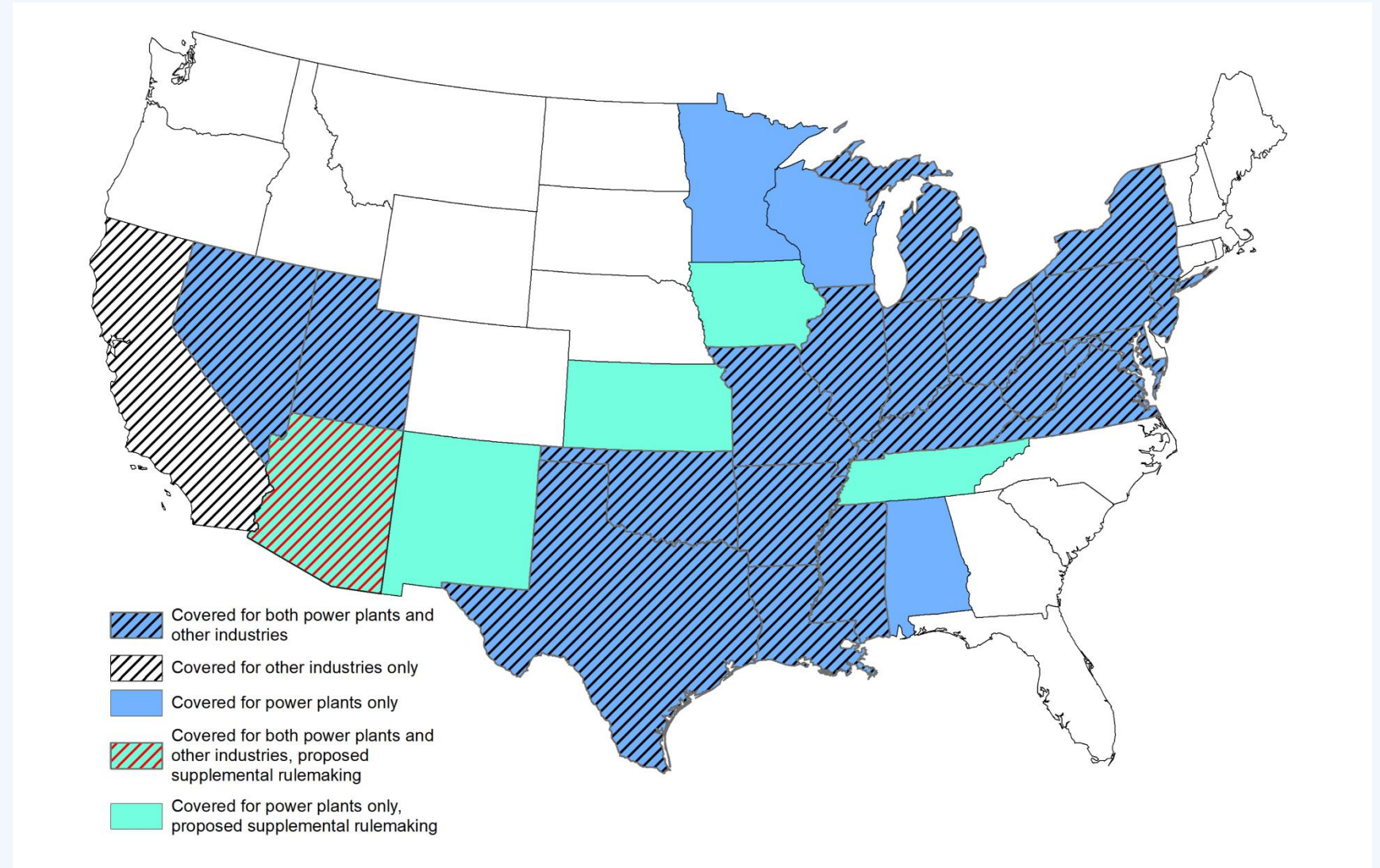
EPA also reconsidering national mobile source standards.



Source: EPA 2022 v1 emission platform https://gaftp.epa.gov/Air/emismod/2022/v1/reports/county_monthly/.

Good Neighbor Plan on Hold

- No state upwind of the OTC proposed any additional reductions in their latest ozone good neighbor SIPs.
- Circuit courts have split on EPA disapprovals of those good neighbor SIPs.
- EPA promulgated the Good Neighbor Plan in light of state inaction, but put on hold by Supreme Court, and EPA reconsidering it.



Map source: EPA, Good Neighbor Plan for 2015 Ozone NAAQS,
<https://www.epa.gov/Cross-State-Air-Pollution/good-neighbor-plan-2015-ozone-naaqs>

Reduced Federal Support for Air Quality Science

- Atmospheric chemistry has changed over the years due to changes in emissions and climate warming
- States rely on federal agencies (e.g., EPA, NOAA, NASA) to keep abreast of changing air quality science
- Increased potential for wasted resources and interstate conflict
 - Inefficient and redundant use of resources for each state to do itself
 - Unnecessary costs to regulated community for control strategies that don't reflect best science
 - Risk of inconsistent state science-based approaches due to political pressures
- Asymmetrical information access between states and regulated community

Funding Uncertain

FY2026 “skinny budget” would eliminate:

- Funding for OTC
- Funding for state air management programs, which includes MANEVU

In Summary

Good news

- Regional cooperation with federal support has resulted in real and significant air quality progress and regional consistency

Bad news

- Air quality problems still persist – ozone and haze trends are flat
- Available tools to achieve future reductions now uncertain, e.g., mobile and upwind sources
- Diminished air quality research on a changing atmosphere
- Uncertain federal funding for federally-required programs