

OTC SAS Committee Update

OTC/MANEVU Stakeholders Meeting

October 9, 2025

Stationary and Area Sources Committee

Chair, Frank Steitz, New Jersey DEP



OZONE TRANSPORT COMMISSION

Presentation Overview

SAS 2025 Charge approved by Commissioners at June 11, 2025 annual meeting

- ✓ Assess Source Emissions Inventory
- ✓ Provide Technical Support for Individual Sectors
- ✓ EPA Office of Air Quality Planning and Standards (OAQPS) Engagement
- ✓ Cross Committee Collaboration

Additional Updates

- ✓ Tracking model rule adoption
- ✓ Input on 2026 charge
- ✓ Annual summary of SAS work
- ✓ 2nd round MWC comments

Assess Source Emissions Inventory

Update on the EGU natural gas and fuel oil turbine workgroup:

- Decided to focus on Part 75 units within the OTR because non-Part 75 units are much smaller in number, may have space constraints for installing controls, and don't operate as much
- Determined it now has its most reliable inventory of Part 75 units along with their NOx emissions
- Surveying the OTC states if they have Part 75 units that can be controlled (e.g., water storage or SCR footprint constraints may restrict ability to install cost-effective controls)

Technical Support on Sectors

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

- Finalized boiler inventory from NEI sorted based on 0-5 MMBtu/hr and 5-50 MMBtu/hr
- Completed spreadsheet of existing industrial heat pump application examples
- Workgroup went on temporary hiatus in August pending results of ongoing work at NESCAUM

Office of Air Quality Planning and Standards (OAQPS) Engagement

- On February 28, 2025, OTC SAS sent letter to EPA OAQPS on lack of updated CTGs/ACTs for “due diligence” RACT SIP revisions
- EPA replied on June 13, 2025 with a request for OTC feedback on which CTGs/ACTs would be the most important to update
- SAS has formed a CTG/ACT workgroup to develop recommendations

Technical Support on Sectors: CTG/ACT Workgroup

- Initiated by the request from OAQPS, SAS has formed a CTG/ACT Workgroup
- The workgroup is holding regular calls to ID candidate CTGs/ACTs
- The workgroup is using the following criteria to ID possible updates:
 1. timing of ACT (or CTG) i.e., when last done;
 2. of those that are old, what state standards have been adopted since then that are more stringent;
 3. which will have the biggest impacts for the OTR (inside or outside OTR)?
- Initial approach is to focus on ACTs because of NO_x; CTGs tend to be more for VOCs

Technical Support on Sectors: CTG/ACT Next Steps

Workgroup members are:

- Working on a spreadsheet comparing different state RACT SIP rules for possible updating ACTs/CTGs
- Working on “cross walk” between ACT NOx categories and SCC codes to rank categories by NOx contributions to overall OTR NOx inventory
- Looking to winnow down the possible ACTs for updating based on ranking of emissions and whether category has been recently updated

Cross Committee Collaboration

Update/Next Steps:

- Coordinating with Modeling Committee on:
 - EGU natural gas and fuel oil turbine information will be shared with the MC when available.
 - Heat pump applications <50 MMBtu/hr information will be shared with the MC when available.

Workgroup Status Recap

- The **EGU natural gas and fuel oil turbine workgroup** continued work requested by SAS during biweekly meetings
- The **heat pump application workgroup** went on temporary hiatus in August pending results of on-going work at NESCAUM.
- The **CTG/ACT workgroup** is developing recommendations to EPA on updating CTGs/ACTs, with an initial emphasis on ACTs.

Other Updates

- On July 16, 2025, posted latest updates on OTC Model Rules
- Soliciting input on CY2026 charge
- Developing annual summary of SAS work

Municipal Waste Combustors

Update:

- On January 23, 2024, EPA solicited comments on *Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Large Municipal Waste Combustors Voluntary Remand Response and 5-Year Review*.
- OTC SAS submitted [comments](#) to EPA on March 25, 2024 including the OTC Municipal Waste Combustors (MWC) NO_x emissions [report](#).
- EPA subsequently reopened the comment period on January 16, 2025 requesting additional info, including any available stack test reports.
- On May 30, 2025, OTC submitted [new comments](#) that included stack test information from recent tests in MD, NH, and NJ, and resubmitted its MWC NO_x report.
- The Committee coordinated with MANEVU TSC on its comment letter focusing on MWC pollutants contributing to regional haze and visibility.

Thank You!

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