

Appendix 10F

**OTC-LADCO Letter to EPA**

June 11, 2008

Robert J. Meyers  
Principal Deputy Assistant Administrator  
Office of Air and Radiation  
Ariel Rios Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Meyers:

Regional transport of air pollutants in the U.S. is a major problem that can only be remedied by cooperation between state and federal governments. Over the years, a number of states and the U.S. Environmental Protection Agency (USEPA) have worked together successfully as part of the Ozone Transport Assessment Group (OTAG) and more recently on ozone and particulate matter (PM) programs. In looking ahead at our future air quality challenges, such as meeting the new national standards for fine particles (PM<sub>2.5</sub>) and ozone, and the need for further progress in improving visibility in mandatory Class I Federal areas, we believe that it is time for the states and USEPA to sit down once again and map out an approach for managing air quality, as called for by the National Research Council in its 2004 report.

We hereby request that the USEPA enter into a dialogue with us to address the multi-pollutant air quality problems in the U.S.; in particular, nonattainment for ozone and PM<sub>2.5</sub>, and visibility impairment due to regional haze. We believe that these discussions should, at a minimum, address the following:

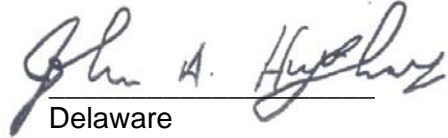
- Establish a common understanding of the reductions expected to be necessary to address ozone and PM<sub>2.5</sub> nonattainment, and visibility problems. We anticipate that existing (and forthcoming) state and federal regulations will provide for further improvement in air quality, but will not be enough to attain and maintain national ambient air quality standards everywhere in the U.S. for ozone and PM<sub>2.5</sub>, especially in light of the new ozone standard, or achieve the goals for visibility in all mandatory Class I Federal areas. States are taking an important first step in coming up with a solution by analyzing the potential for additional reductions from a number of key contributing source sectors, which we will bring to the table.
- Identify strategies for achieving effective, equitable, and necessary emission reductions from all important contributing source sectors. Traditional and innovative measures should be considered, as well as consideration for implementing national regulations and programs based on cost-effective and technically feasible state and regional control measures already in place. Possible measures include a third phase of reductions for electrical generating units (EGUs), controls for existing industrial, commercial, and institutional (ICI) boilers, programs to reduce primary (and secondary) emissions from on-road and off-road mobile sources, and maintaining and strengthening inspection and maintenance programs.

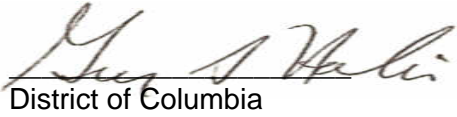
- Determine appropriate regulatory approaches for achieving these emission reductions under the existing framework of the Clean Air Act. These approaches would be designed to utilize the effectiveness and uniformity provided by federal programs while providing for important regional differences and administrative flexibility.

We look forward to working in partnership with USEPA to address our air quality problems.

Sincerely,

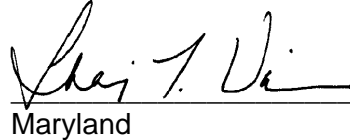
  
Connecticut

  
Delaware

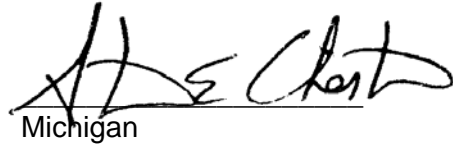
  
District of Columbia

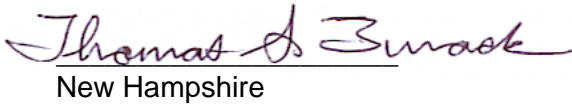
  
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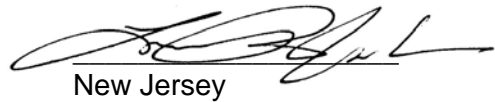
  
Maine

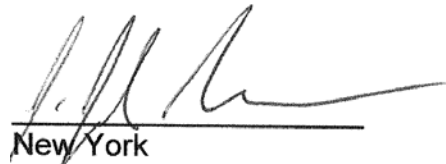
  
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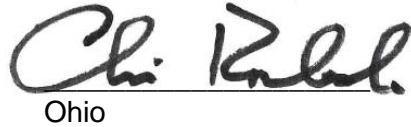
  
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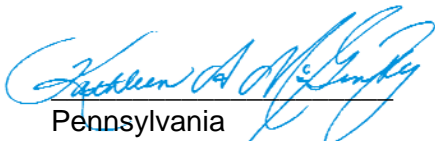
  
Michigan

  
New Hampshire


  
New Jersey

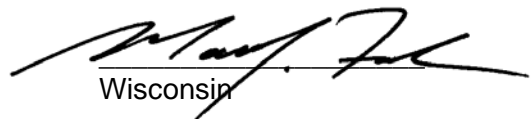
  
New York

  
Ohio

  
Pennsylvania

  
Rhode Island

  
Vermont

  
Wisconsin