

December 9, 2013

Lisa Bonnet, Director  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East, P.O. Box 19276  
Springfield, Illinois 62794-9276

Dear Director Bonnet:

The undersigned Mid-Atlantic and Northeast state environmental Commissioners write to follow-up to our previous correspondence in late May inviting Illinois to join the Ozone Transport Commission (OTC). Thank you for your response and your interest in working with us to address ozone transport, which continues to adversely impact air quality in our states. We are committed to continuing to work together in an effort to find solutions to the ozone transport problem.

As you know, our Air Directors have begun collaborative discussions on the technical issues associated with ozone transport. We encourage Illinois' active participation in this technical collaboration. Moving the collaborative process ahead quickly is a high priority, as exposure to unhealthy levels of ozone continues to be a problem in all of our states. Our objective over the course of the next year, based on our collaborative work, is to identify and reach broad consensus on a set of measures to reduce ozone transport, and to formally memorialize an agreement to move forward with implementation of the measures in a memorandum of agreement or other similar document.

In that context, we acknowledge and appreciate the measures that Illinois has already implemented to reduce its air emissions, as well as the effort Illinois is making to work collaboratively with our states to resolve this air quality problem.

We are committed to this collaborative process, and are hopeful that it will result in a workable, effective solution to the ozone transport problem. Given the uncertainty about the outcome of this process and the urgency of reducing ozone levels in our states, however, we are compelled to pursue all possible avenues to achieve our goals. In this regard, we have submitted a Clean Air Act §176A petition to the U.S. Environmental Protection Agency (EPA) requesting EPA to add your state and eight others to the Ozone Transport Region. A courtesy copy of the Petition is enclosed.

The §176A petition process is one of the tools that Congress provided in the Clean Air Act to address ozone transport. Section 176A requires EPA to solicit public input and make a decision on the Petition within 18 months.

In response to your inquiry about possible additional measures that Illinois and other states could implement to reduce emissions, we have summarized below the suite of stationary and mobile source control measures which most of our states have adopted going beyond federal measures.

Most of our states have adopted the California low emissions vehicle program and some have included the zero emissions vehicle mandate. Some of our states have implemented motor vehicle inspection and maintenance programs that go beyond the federal requirements (e.g., state-wide application where coverage was mandated for only a portion of the state). As OTC states, we have expanded the reformulated gas program beyond the area required in the Clean Air Act.

States such as New York, Delaware, and Maryland have implemented additional electric generating unit (EGU) control programs. All three of these state programs have successfully reduced NO<sub>x</sub>, SO<sub>2</sub> and mercury emissions. Many of our states have adopted additional OTC NO<sub>x</sub> control programs for a variety of types of commercial and industrial facilities including: boilers; combustion turbines; reciprocating internal combustion engines; cement kilns; glass plants; and asphalt plants. In addition, some individual states along the Interstate-95 corridor have adopted regulations to reduce peak electrical demand and peak electrical generation.

Other OTC stationary source control programs address VOCs from a variety of sources, such as: architectural and industrial maintenance coatings; consumer products; portable fuel containers; industrial solvent operations; automotive refinishing; commercial sealants and adhesives; and asphalt paving and sealants.

Finally, you asked about the data and information that our commissioners are using to assess air quality impacts from upwind states and the extent to which this data and information accounts for existing and future emission reduction requirements. The OTC modeling analysis indicates that these programs (those already implemented and those adopted, but not yet implemented) will not yield the level of emission reductions needed to attain the ozone standard. The technical analyses we have submitted along with our §176A petition to EPA provide additional information about how upwind states, including Illinois, contribute to nonattainment in these downwind states.

Thank you again for your interest in working with us on our shared ozone transport problem, and please do not hesitate to call any of us if you wish to discuss these matters further.

Sincerely,



**Daniel C. Esty, Connecticut**



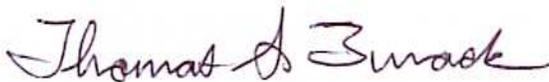
**Collin P. O'Mara, Delaware**



**Robert M. Summers, Ph.D., Maryland**



**Kenneth L. Kimmell, Massachusetts**



**Thomas S. Burack, New Hampshire**

A handwritten signature in blue ink that reads "Joseph J. Martens". The signature is written in a cursive style with a large initial 'J'.

**Joseph J. Martens, New York**

A handwritten signature in blue ink that reads "Janet Coit". The signature is written in a cursive style with a large initial 'J'.

**Janet Coit, Rhode Island**

A handwritten signature in blue ink that reads "David K. Mears". The signature is written in a cursive style with a large initial 'D'.

**David K. Mears, Vermont**

Enclosure