

**NACAA Resolution on the Need for Strong Federal Control Measures  
to Support Attainment and Maintenance of the National Ambient Air Quality Standards**

**Approved at NACAA Fall 2010 Membership Meeting  
October 19, 2010**

**Whereas**, state and local air pollution control agencies face an unprecedented set of challenges in developing implementation plans to attain and maintain numerous new National Air Quality Standards (NAAQS) and other programs to further reduce air pollution across the United States;

**Whereas**, research increasingly shows that air quality is significantly affected by the long distance transport of air pollution, particularly for ozone and fine particulate matter (PM<sub>2.5</sub>), across hundreds of miles from upwind states to downwind states;

**Whereas**, the National Association of Clean Air Agencies (NACAA) and the Environmental Protection Agency (EPA) are working in partnership to efficiently use federal, state and local resources to maximize environmental protection in a period where budgets across all levels of government are constrained;

**Whereas**, implementation of regional nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) control programs since the 1990s have shown that these regional control programs can dramatically reduce ground level ozone and PM<sub>2.5</sub> pollution;

**Whereas**, the Clean Air Act provides that air pollution prevention and air pollution control at its source is the primary responsibility of state and local governments but also requires EPA to address sources that are nationally significant;

**Whereas**, there are seven source categories that can be cost-effectively regulated at the national level that represent about 75 percent of the NO<sub>x</sub> inventory, 85 percent of the SO<sub>2</sub> inventory and 75 percent of mercury emissions;

**Whereas**, further reductions in NO<sub>x</sub>, SO<sub>2</sub> and mercury will result in thousands of additional lives saved each year, dramatically reduce illnesses and avoid other harm to public health and welfare;

**Whereas**, there is the potential to also reduce emissions of numerous other air pollutants, such as air toxics, diesel particulate and greenhouse gases and to help resolve other environmental issues, including regional haze, acid deposition and nitrogen deposition to water bodies, as a co-benefit from controlling these seven categories;

**Therefore, be it resolved** that NACAA strongly urges EPA to adopt or refine national rules for the following seven source categories to achieve multi-pollutant emission reductions that help all areas of the nation attain and maintain existing and new NAAQS:

- Electric generating units;
- Industrial, commercial and institutional boilers;
- Cement kilns;

- Light-duty vehicles;
- Locomotive engines;
- Oceangoing marine engines, and
- Aircraft.

**Be it further resolved** that NACAA urges EPA to use all available legal authorities to adopt these rules in a timeframe that ensures that reductions begin no later than 2015 and that they are phased in so that attainment is achieved by the required attainment dates for new and existing NAAQS.

**Be it further resolved** that NACAA urges EPA to expeditiously determine whether it possesses sufficient legal authority to adopt emission control strategies for the seven categories described above, including strategies to reduce emissions from in-use equipment if necessary to allow all areas of the nation to attain existing and new NAAQS in a timely manner, and notify Congress if such authority is lacking.

**Be it further resolved** that NACAA will provide EPA with any assistance needed, including state or local model rules and technical data and analysis to help EPA adopt these rules as expeditiously as possible.