



March 6, 2015

RE: Environmental Protection Agency
Docket number EPA-HQ-OAR-2008-0699
National Ambient Air Quality Standards for Ozone
79 Fed. No. 242 (December 17, 2014)

Submitted By: Gas Turbine Association
Dr. William H. Day, Managing Director
billday3@comcast.net

The Gas Turbine Association (GTA) is a trade organization representing the major gas turbine manufacturers in the United States. GTA members produce turbines ranging from 1 to over 300 MW in size. Member companies produce gas turbines for the power industry, oil and gas operations, commercial operations such as hospitals and campuses, and industrial operations.

GTA serves as a voice for the gas turbine industry. Today gas turbines produce more than a quarter of our nation's electricity. They are a cornerstone energy conversion technology, providing electricity and heat for industries and communities. Gas turbines will play an increasingly important role in the achievement of national objectives related to energy and the environment.

GTA appreciates the opportunity to comment on EPA's proposed ozone standard. While the proposal solicits comment on many ozone related issues, GTA is commenting on just one. Specifically, EPA is soliciting public comment on whether to retain the current 2008 National Ambient Air Quality Standard (NAAQS) of 75 ppb or lower it.

The GTA strongly urges the EPA to retain the current NAAQS standard at 75 ppb (8-hr average) and allow the 2008 standard to be fully implemented prior to considering a lower standard. Due to litigation-based delays, states are still in the process of implementing the 2008 standard and the full benefit to air quality has not yet been realized. The current ozone standards need an opportunity to work.

GTA Member Companies

Alstom Power
Florida Turbine Technologies
GE Energy
Meggitt Vibro-Meter Inc.
OPRA Turbines
PCC Airfoils
Pratt & Whitney
PW Power Systems
Siemens Energy
Solar Turbines Incorporated
Strategic Power Systems