NATIONAL ASSOCIATION OF Manufacturers

U.S. CHAMBER OF COMMERCE

September 11, 2014

U.S. Environmental Protection Agency
Attention Docket ID No. EPA –HQ–OAR–2013–0495
EPA Docket Center, U.S. EPA
Mailcode: 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Amendment to the May 9, 2014 Comments of the National Association for Manufacturers and the U.S. Chamber of Commerce for the EPA's Standards of Performance for Greenhouse Gas Emissions From New Stationary Sources: Electric Utility Generating Units, Docket ID No. EPA –HQ–OAR–2013–0495; FRL–9839–4, 79 Fed. Reg. 1,430 (January 8, 2014)

On May 9, 2014, the National Association of Manufacturers and the U.S. Chamber of Commerce ("the Chamber")[1] co-signed comments in response to the Environmental Protection Agency's Proposed Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units. The NAM and the Chamber respectfully request the opportunity to submit this letter into the docket in order to amend their comments with regards to the EPA's Best System of Emission Reduction (BSER) analysis for Natural Gas Combined Cycle (NGCC) turbines. As described below, the NAM and the Chamber offer two points for consideration in the final rule.

First, the EPA in the final rule should raise the Cut-Point for NGCC Units from 850 MMBtu/hr (HHV) to 1,500 MMBtu/hr (HHV). A cut-point value of 1,500 MMBtu/hr (HHV) more accurately reflects the break between large and small units with respect to efficiency capability, while also providing a small margin to allow for measured capacity growth due to expected technology advancements becoming commercially available.[2]

Second, a 1,100 lb. CO_2/MWh standard is achievable for gas turbine units with a heat input rate above 1,500 MMBtu/hr (HHV), while a standard of 1,200 lb. CO_2/MWh is achievable for gas turbine units with a heat input rate equal to or less than 1,500 MMBtu (HHV). Higher emissions standards would better reflect BSER in real world conditions for NGCC units.[3] As an alternative and to ensure that all new and efficient NGCC units are able to achieve the standard

[1] The U.S. Chamber of Commerce is the world's largest business federation representing the interests of more than 3 million businesses of all sizes, sectors, and regions, as well as state and local chambers and industry associations. The Chamber is dedicated to promoting, protecting, and defending America's free enterprise system.
[2] *See* Comments of the Gas Turbine Association, Proposed Standards of Performance for Greenhouse Gas Emissions From New Stationary Sources: Electric Utility Generating Units, 16-17. (May 7, 2014).
[3] *Id.* at 25-26.

without running the risk of periods of operations out of compliance, a single emission limit could be set at 1,200 lb. and apply to all NGCC units.

Thank you for considering this amendment to the comments of the NAM and the Chamber as the EPA finalizes the proposed rule. If you have any further questions, please feel free to reach out to Ross Eisenberg, Vice President, Energy and Resources Policy at the National Association of Manufacturers at (202) 637-3173 or by e-mail at reisenberg@nam.org.

National Association of Manufacturers U.S. Chamber of Commerce