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VIA ELECTRONIC SUBMISSION

March 17, 2015

Administrator Gina McCarthy
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID EPA-HQ-OAR-2008- 0699, Comments on EPA's Proposed Rulemaking on National Ambient Air Quality Standards for Ozone

Dear Administrator McCarthy:

Associated Builders and Contractors, Inc. (ABC) submits the following comments to the Environmental Protection Agency (EPA) in response to the above-referenced notice of proposed rulemaking published in the Federal Register on December 17, 2014, at 79 Fed. Reg. 75234.

About Associated Builders and Contractors, Inc.

ABC is a national construction industry trade association representing nearly 21,000 chapter members. ABC and its 70 chapters help members develop people, win work and deliver that work safely, ethically and profitably for the betterment of the communities in which they work. ABC member contractors employ workers whose training and experience span all of the 20-plus skilled trades that comprise the construction industry. Moreover, the vast majority of our contractor members are classified as small businesses. Our diverse membership is bound by a shared commitment to the merit shop philosophy in the construction industry. The philosophy is based on the principles of nondiscrimination due to labor affiliation and the awarding of construction contracts through open, competitive bidding based on safety, quality and value. This process assures that taxpayers and consumers will receive the most for their construction dollar.

ABC members know exceptional jobsite safety and health practices are inherently good for business. ABC understands the importance of common-sense regulations based on sound evidence and scientific analysis with appropriate consideration paid to implementation costs and input from employers.

ABC's Comments on EPA's Proposed Rule

On December 17, 2014, EPA issued a proposed rulemaking to revise the National Ambient Air Quality Standards (NAAQS) for ozone under the Clean Air Act (Act). According to the Act, the primary NAAQS must be set at a level requisite to protect the public health with an adequate margin of safety, and the secondary NAAQS must be set at a level requisite to protect the public welfare from any known or anticipated adverse effects. The current standards are based on the 2008 revision, in which EPA revised both the primary and secondary NAAQS for ozone. EPA established a standard for both primary and



also asks for comments on retaining the current standard of 75 ppb and reducing it even lower to a rate of 60 ppb. In addition, EPA proposes to make the secondary standard the same as the revised primary standard.

State and local agencies are still in the process of preparing and submitting state implementation plans (SIPs) to EPA in order to meet the 2008 ozone standards. These current standards are behind schedule, due to EPA effectively suspending implementation from 2010-2012. In 2010, EPA proposed to lower the 2008 standards to a range of 60 to 70 ppb, without any new scientific evidence and ahead of the scheduled five-year review. After receiving an outpouring of comments from the public, EPA withdrew the proposal. Therefore, states and local agencies did not meet the three-year deadline for submitting infrastructure SIPs to EPA. Furthermore, EPA only finalized its implementation guidance of SIPs for areas that were

equipment that can be utilized. As a way for states to potentially achieve attainment, states may impose restrictions on equipment such as diesel engines or mobile sources.