

February 1, 2018

Mr. William Wehrum
Assistant Administrator, Office of Air and Radiation
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Docket ID No. EPA-HQ-OAR-2017-0545; State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units; Advanced Notice of Proposed Rulemaking

Dear Assistant Administrator Wehrum:

The Association of Air Pollution Control Agencies (AAPCA)¹ requests an extension of the deadline for submitting comments on the U.S. Environmental Protection Agency's (EPA) advanced notice of proposed rulemaking (ANPRM), State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units.² AAPCA is seeking an extension of the comment period by at least 60 days, from February 26, 2018, until April 27, 2018.

An additional 60 days for public comment would give key stakeholders, such as state and local air agencies, time to more fully address the substantial policy, legal, and technical components of the ANPRM. As this ANPRM will inform EPA's possible efforts to replace the Clean Power Plan, an extension would also better align the comment deadline with that of EPA's proposed repeal of the Clean Power Plan, recently rescheduled to April 26, 2018 to accommodate several listening sessions.³ Providing additional time for interested parties to consider and submit comments is vital as EPA seeks to make an informed decision on a possible future rulemaking.

Thank you for your consideration of this request for an extension. If you have any questions concerning this request, please contact Mr. Jason Sloan, AAPCA's Executive Director, at jsloan@csg.org or (859) 244-8043.

Sincerely,

A handwritten signature in black ink that reads "Stuart Spencer". The signature is written in a cursive, flowing style.

Stuart Spencer
Associate Director, Arkansas Department of
Environmental Quality
President, AAPCA

¹ AAPCA is a national, non-profit, consensus-driven organization focused on assisting state and local air quality agencies and personnel with implementation and technical issues associated with the federal Clean Air Act. AAPCA represents more than 40 state and local air agencies, and senior officials from 20 state environmental agencies currently sit on the AAPCA Board of Directors. You can find more information about AAPCA at: <http://www.cleanairact.org>.

² 82 FR 61507 – 61519.

³ <https://www.epa.gov/stationary-sources-air-pollution/public-hearing-repealing-clean-power-plan>.