

December 2, 2016

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

Subject: Docket ID No. EPA-HQ-OAR-2016-0202; Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements

Administrator McCarthy:

The Association of Air Pollution Control Agencies (AAPCA)<sup>1</sup> requests an extension of the deadline for submitting comments on the U.S. Environmental Protection Agency's (EPA) proposed rule, Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area Classifications and State Implementation Plan Requirements.<sup>2</sup> EPA should extend the comment period for at least 30 days past the stated deadline of January 17, 2017.

AAPCA's members are the state and local air pollution control agencies responsible for attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) and will be affected directly by the proposed rule. This rulemaking will dictate a number of potentially resource-intensive actions by these air agencies over the next several years. The proposal completed Executive Order 12866 review on September 28, 2016,<sup>3</sup> but the prepublication version was not provided to air agencies until early November 2016 and published in the Federal Register more than seven weeks after the completion of interagency review.

In addition to requesting comment on proposed provisions like approaches for revoking the 2008 ozone NAAQS, ozone interprecursor trading provisions for the Nonattainment New Source Review offset requirement, and requirements for reasonable further progress Milestone Compliance Demonstrations, reasonably available control technology, reasonably available control measures, emissions inventories, and emissions statements, the proposed rule also requests feedback on open-ended and diverse subjects that include:

- Managing Emissions From Wildfire and Wildland Prescribed Fire
- Transportation Conformity and General Conformity
- Requirements for Contingency Measures in the Event of Failure To Meet a Milestone or To Attain
- International Transport and Background Ozone
- Additional Policies and Programs for Achieving Emissions Reductions

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<sup>1</sup> The Association of Air Pollution Control Agencies (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. Twenty state environmental agencies currently sit on AAPCA's Board of Directors. AAPCA is housed in Lexington, Kentucky as an affiliate of The Council of State Governments. You can find more information about AAPCA at: <http://www.cleanairact.org>.

<sup>2</sup> 81 FR 81276-81317.

<sup>3</sup> RIN: 2060-AS82.

- Additional Requirements Related to Enforcement and Compliance
- Applicability of Proposed Rule to Tribes

In light of the importance of this rulemaking and a comment period that coincides with several federal holidays, AAPCA asks that EPA extend the comment period until at least February 16, 2017.

Thank you considering this request for an extension. If you have any questions regarding our request, please contact [cwoods@csg.org](mailto:cwoods@csg.org) or (859) 244-8040.

Sincerely,



Clinton J. Woods, Executive Director  
AAPCA