



September 23, 2022

Ms. Deanne Grant
Office of Emergency Management
Environmental Protection Agency
1200 Pennsylvania Avenue, NW Washington, DC 20460

RE: Request for an Extension of the Comment Period on Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act; Safer Communities by Chemical Accident Prevention Docket ID No. EPA-HQ-OLEM-2022-0174

Dear Ms. Grant:

The Agricultural Retailers Association (ARA) formally requests that the U.S. Environmental Protection Agency (EPA) grant a minimum 60-day deadline extension for comment submissions on the Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act; Safer Communities by Chemical Accident Prevention proposed rule (87 Fed. Reg. 53556, August 31, 2022). This allowance will give ARA and other stakeholders needed time to assess the totality of the information presented in the proposed rule and supporting documents and provide thoughtful and comprehensive comments.

ARA encourages EPA to provide the public with additional time to provide input on complex revisions to the Risk Management Program (RMP) regulations. The proposed changes to RMP regulations will impact significant amounts of facilities, including agricultural retail facilities, and it is essential that any changes consider the expertise and concerns of the public and impacted industries. ARA urges the EPA to grant an extension of the comment period by 60 days to maximize the ability for stakeholder input. The additional time will give impacted industries and communities the necessary time to consider and understand the impacts of the proposed rule more fully.

Thank you for your review and consideration of our request.

Sincerely,

Richard D. Gupton
Senior Vice President, Public Policy & Counsel