

January 13, 2017

Mr. Brian Timin
Air Quality Assessment Division
U.S. Environmental Protection Agency (EPA)
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Mr. Patrick Lessard
Air Quality Policy Division
U.S. Environmental Protection Agency (EPA)
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Subject: Draft PM_{2.5} Precursor Demonstration Guidance; Comment Period Extension Request

Dear Mr. Timin and Mr. Lessard:

The Association of Air Pollution Control Agencies (AAPCA)¹ requests an extension of the public comment period for U.S. EPA's draft PM_{2.5} Precursor Demonstration Guidance² for a minimum of two weeks, until at least February 14, 2017. An extended comment period would help to ensure important, meaningful feedback on this guidance from state and local agencies to EPA.

Released on December 9, 2016, EPA's draft PM_{2.5} Precursor Demonstration Guidance currently has a comment deadline of January 31, 2017.³ While a webinar was held on December 19 to discuss the guidance, the comment period includes three Federal holidays⁴ and the 2017 presidential inauguration, and overlaps with the review periods of several other EPA rulemakings and deadlines related to modeling.

Alongside reviewing this guidance, agencies are also evaluating EPA's draft Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone and PM_{2.5} under the PSD Permitting Program (comment deadline of February 3, 2017)⁵ and EPA's final rule Revisions to the Guideline on Air Quality Models: Enhancements to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter,⁶ which is projected to be published in the Federal Register on January 17, 2017.⁷ Air agencies also anticipate

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. 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>.

² https://www.epa.gov/sites/production/files/2016-11/documents/transmittal_memo_and_draft_pm25_precursor_demo_guidance_11_17_16.pdf.

³ PM_{2.5} Precursor Demonstration Guidance, pg. 2.

⁴ A listing of Federal holidays can be found at: <https://www.opm.gov/policy-data-oversight/snow-dismissal-procedures/federal-holidays/#url=2017>.

⁵ https://www3.epa.gov/ttn/scram/guidance/guide/EPA-454_R-16-006.pdf.

⁶ https://www3.epa.gov/ttn/scram/appendix_w/2016/AppendixW_2016.pdf.


⁷ <https://www.federalregister.gov/documents/2017/01/17/2016-31747/guideline-on-air-quality-models-enhancements-to-aermod-dispersion-modeling-system-and-incorporation>.

additional opportunities to engage with U.S. EPA staff to understand the relationship between draft PM_{2.5} Precursor Demonstration Guidance and these actions.

These documents are extensive and highly technical, requiring significant time to read and process. An adjusted deadline for comments on the PM_{2.5} Precursor Demonstration Guidance would provide a better opportunity for state and local agencies to offer substantive feedback, as well as allow for a more appropriate timeline for examining related documents.

AAPCA appreciates your consideration of this request to extend the comment deadline for the draft PM_{2.5} Precursor Demonstration Guidance for at least an additional two weeks. If you have any questions regarding our request, please contact Clint Woods at cwoods@csg.org or (859) 244-8040.

Sincerely,



Clinton J. Woods, Executive Director
AAPCA