

Ross E. Eisenberg

Vice President

Energy & Resources Policy

March 22, 2016

Mr. James Belke
U.S. Environmental Protection Agency
Office of Emergency Management
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Re: Request for Extension of Comment Period on EPA's Proposed Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)(7)

Dear Mr. Belke:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, respectfully requests an extension of the public comment period, for an additional 30 days, on the Environmental Protection Agency's (EPA or Agency) proposed rule regarding EPA Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)(7) (EPA-HQ-OEM-2015-0725) from May 13 to June 13, 2016. We also request that EPA extend the comment period by 30 days for the Information Collection Request (ICR 2537) from April 13 to May 13, 2016.

The proposed rulemaking consists of a large volume of information that is complex and technical in nature. While many of these topics were raised in the 2014 EPA Request for Information (RFI), they were presented in a broad context. The NAM and its members need additional time to provide thoughtful and meaningful comments. Given the EPA allowed for a 90-day comment period for the RFI, there is no reasonable justification for providing the public only 60 and 30 days, respectively, for the current proposed rule and ICR, to review, analyze and prepare comments on these complex and technical issues.

This regulation has the potential to greatly increase business costs for our members, especially for small businesses, possibly impacting job loss in the manufacturing sector. As a result, we urge the EPA to provide an additional 30 days for interested stakeholders to provide meaningful and deliberative comments on the proposed rule, and to provide substantive responses to the EPA's request for additional information.

We thank you in advance for your consideration on this matter.

Sincerely,



Ross Eisenberg
Vice President
Energy and Resources Policy

Leading Innovation. Creating Opportunity. Pursuing Progress.