

August 15, 2019

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VIA CERTIFIED AND ELECTRONIC MAIL

Hon. Anne Idsal
Assistant Administrator
U.S. Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**RE: Docket ID# EPA-HQ-OAR-2019-0168
Request for an Extension of Period to Provide Public Comment for the Section
610 Review of “Regulation of Fuels and Fuel Additives: Changes to Renewable
Fuel Standard Program”**

Dear Assistant Administrator Idsal:

On June 24, 2019, EPA published a notice in the Federal Register stating that it was seeking comments on the impacts on small businesses from compliance with the Renewable Fuel Standard (RFS) (“Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program” (RFS2) pursuant to section 610 of the Regulatory Flexibility Act. 84 Fed. Reg. 29690, 29694 (June 24, 2019)). Public comments are due on August 22, 2019. Because RFS2 is a broad and complex rule, the Small Refiners Coalition requests a 30-day extension of the comment period to allow stakeholders the opportunity to fully develop thoughtful feedback on RFS2’s effects on small entities. With a 30-day extension, the new comment deadline would be September 21, 2019.

As EPA is aware, there has been much recent activity related to the RFS program. For example, EPA recently finished a rulemaking that culminated in the final rule “Modification to Fuel Regulations to Provide Flexibility for E15; Modifications to RFS RIN Market Regulations Rulemaking” on June 10, 2019. *See* 84 Fed. Reg. 26980 (June 10, 2019). Currently pending is the rulemaking for the 2020 Renewable Volume Obligations (RVO). *See* 84 Fed. Reg. 36762 (July 29, 2019). The comment period for that rule closes on August 30, 2019, only eight days after the comment period for EPA’s 610 review is set to close. In order to provide meaningful comments as part of EPA’s section 610 review process, the Coalition requests a 30-day extension of the comment period.

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We appreciate your consideration of this request. Please let me know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "LeAnn M. Johnson Koch". The signature is fluid and cursive, with the first name "LeAnn" being more prominent.

LeAnn M. Johnson Koch

cc (via electronic mail):

Ben Hengst
Julia Burch
Jessica Mroz