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**VIA CERTIFIED AND ELECTRONIC MAIL**

The Honorable 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:

We write on behalf of the Small Retailers Coalition, an organization made up of over two hundred gas station and convenience store owners, to request an extension of the period to provide public comment for the Section 610 Review of “Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program.”

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 Program. 84 Fed. Reg. 29690, 29694 (June 24, 2019). Public comments are due on August 22, 2019.

The Renewable Fuel Standard Program is a broad and complex rule, and it often takes time to gather input from Small Business Coalition’s members. Thus, the Small Retailers Coalition requests a 30-day extension of the comment period to allow it the opportunity to fully develop thoughtful feedback on the rule’s effects on small entities, especially the impact of the

current point of obligation rule on small fuel retailers. 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 Renewable Fuel Standard 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. 84 Fed. Reg. 26980 (June 10, 2019). Moreover, the rulemaking for the 2020 Renewable Volume Obligations is currently pending and has a comment period that closes on August 30, 2019. 84 Fed. Reg. 36762 (July 29, 2019). To provide meaningful comments as part of EPA’s section 610 review process, the Small Retailers Coalition requests a 30-day extension of the comment period.

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

Respectfully yours,

A handwritten signature in blue ink, appearing to be 'M J', followed by a horizontal line extending to the right.

Suzanne Murray  
Michael J. Scanlon