



September 7, 2022

SUBMITTED VIA E-MAIL

Mr. Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Proposed Rule - Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act; Safer Communities by Chemical Accident Prevention (EPA-HQ-OLEM-2022-0174)

Administrator Regan:

The American Water Works Association, Association of Metropolitan Water Agencies, National Rural Water Association, National Association of Water Companies, National Association of Clean Water Agencies, and the Water Environment Federation respectfully request that the comment period for the above referenced rulemaking be extended by 60 days. EPA has requested comment on a number of important issues relating to the implementation of the Risk Management Program, and considerations for new provisions. We believe that a 120-day comment period is necessary to provide a reasonable opportunity for public review and comment.

Absent sufficient time to review the Agency plans to revise the RMP program, it may be difficult to assess the effect this proposed federal action may have on the regulated entities. A significant number of drinking water and wastewater systems covered by the RMP rule are classified as small entities and we would appreciate the opportunity to fully review and understand

the rule, including the Regulatory Impact Assessment that the Agency has prepared to support the proposal.

We would appreciate a response to this request as soon as possible. Should you have questions or would like to discuss this matter, please contact Kevin Morley (kmorley@awwa.org), Brian Redder (redder@amwa.net), Mike Keegan (keegan@ruralwater.org), Rik Hull (Rik@nawc.com), Cynthia Finley (CFinley@nacwa.org), or Lisa McFadden (lmcfadden@wef.org).

Sincerely,

G. Tracy Mehan, III

Executive Director of Government Affairs
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Adam Krantz

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cc: Barry Breen – OLEM
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