



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 24 2009

OFFICE OF
AIR AND RADIATION

Ms. Karin Ritter
Manager, Regulatory and Scientific Affairs
The American Petroleum Institute
1220 L Street, NW
Washington, D.C. 20005-4070

Dear Ms. Ritter:

Thank you for your letter dated April 16, 2009, to the U.S. Environmental Protection Agency's (EPA) Docket Center in which you request an extension of the comment period for the Notice of Proposed Rulemaking (NPRM) for the Mandatory Reporting of Greenhouse Gases for 30 days beyond the current deadline of June 9, 2009 (74 FR 16448). I appreciate your recognition of the scope and complexity of the NPRM.

Due to the time sensitive nature of this rulemaking and the urgent need to finalize it to allow for 2010 data collection, we have proposed a 60 day comment period. The data submitted under this rulemaking will help inform future policies in the Administration and in Congress, so it is imperative to allow for enough time to finalize the rule before the end of 2009. In addition, the FY08 Appropriations Act requires EPA to issue a final rule by June 26, 2009. Although we will not be able to complete the rulemaking by that date, it further emphasizes the necessity of completing it in a timely manner.

EPA recognizes that the NPRM, the associated Technical Support Documents, and the additional analyses contained in the docket may take considerable time to review. To that end, we posted the NPRM on March 10, 2009, the day it was signed by the Administrator. We also opened the docket and posted other resources such as the Regulatory Impact Analysis and source-specific information sheets on our website approximately two weeks before the NPRM appeared in the Federal Register to provide additional time for review. In addition, we have provided numerous resources, including overview briefings and factsheets as well as shorter information sheets for nearly each subpart of the rule, on our website (<http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>) in order to facilitate the review of this package.

The Agency must balance any request for an extension of the comment period with our obligation to comply with the Appropriations Act and the need to collect the data to inform future policy development. Given these considerations, we are not extending the date of the formal comment period past the June 9, 2009 deadline.

Again, thank you for your interest in supporting our efforts to collect accurate data. The Agency is committed to maintaining an open rulemaking process on all of our efforts. Please contact me if you have any further questions on this or any other rule.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Craig". The signature is written in a cursive, flowing style.

Elizabeth Craig
Acting Assistant Administrator