

ENVIRONMENTAL PROTECTION NETWORK

November 27, 2018

Administrator Andrew Wheeler
U.S. Environmental Protection Agency (Mail Code 1101A)
U.S. EPA Headquarters, William Jefferson Clinton Building
1200 Pennsylvania Ave. N.W.
Washington, D.C. 20460
Also via email to docket

Re: Request for a Comment Period Extension and Hearings for EPA's Proposal entitled "Emergency Release Notification Regulations: Reporting Exemption for Air Emissions from Animal Waste at Farms; EPCRA", 83 Fed. Reg. 56791 (November 14, 2018); Docket No. EPA-HQ-OLEM-2018-0318.

Dear Mr. Wheeler,

I am writing on behalf of the [Environmental Protection Network](#) (EPN). EPN is an organization comprised of over 350 EPA alumni volunteering their time to protect the integrity of US EPA, human health and the environment. We harness the expertise of former US EPA career staff and confirmation-level appointees to provide an informed and rigorous defense against current Administration efforts to undermine public health and environmental protections.

On November 14, 2018, EPA proposed a rule exempting all concentrated animal feeding operations ("CAFOs") from requirements to report releases of extremely hazardous substances into the air under the Emergency Planning and Community Right-to-Know Act ("EPCRA"). In its proposed rule, the agency solicits comments on its proposed EPCRA exemption and the regulatory definition of the terms "animal waste" and "farm" used in that exemption.

We respectfully request that EPA extend the comment period for the above-referenced proposed rule for a minimum of sixty (60) days beyond the currently scheduled public comment deadline. We also encourage EPA to schedule at least three public hearings in various locations across the country to encourage additional public input and participation. The current timeframe and opportunities for engagement are inadequate and will not allow for sufficient public participation in this rulemaking process. Many experts in the public health community have yet to weigh in on the health risks associated with ammonia and sulfur oxides that are released by many of the facilities subject to this rulemaking. The 30-day comment period and lack of any public hearings precludes countless individuals and their Local Emergency Preparedness Committees from commenting on this proposed rule and its impact on their health and economic well-being.

Finally, the current comment period straddles both the Thanksgiving and Hanukkah holiday periods, and closes soon before the Christmas and New Year's holiday periods, conflicting with any prior commitments during this year-end holiday period.

We look forward to your affirmative response to this request.

Respectfully Submitted on Behalf of the Environmental Protection Network,

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