

September 8, 2014

BY ELECTRONIC MAIL [Newberg.cindy@epa.gov]

Ms. Cynthia Newberg, Chief
Alternatives and Emissions Reduction Branch
Office of Atmospheric Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Re: Request for Extension of the Public Comment Period on the U.S. Environmental Protection Agency's Proposed Change of Listing Status for Certain Substitutes Under the SNAP Program; Docket No. EPA-HQ-OAR-2014-0198

Dear Ms. Newberg:

The undersigned organizations request that the U.S. Environmental Protection Agency (EPA) formally extend the public comment period, currently set to end October 6, 2014, by 60 days for its proposed rule, *Change of Listing Status for Certain Substitutes Under the SNAP Program* (Docket No. EPA-HQ-OAR-2014-0198). The undersigned are all trade associations whose members manufacture or engage in business that is dependent upon equipment that utilizes refrigerants subject to the proposed rule and will be significantly impacted by EPA's proposed regulatory action.

These same trade associations (and their members) also are being impacted by, and are currently engaged in, pending and existing Department of Energy (DOE) energy efficiency standards that affect much of the same equipment to be impacted by EPA's proposed regulations (and EPA's related SNAP proposed rule identified below). The relevant pending rulemaking actions include:

- DOE's Automatic Commercial Ice Makers Energy Conservation Standards Rulemaking, Docket No. EERE-2010-BT-STD-0037;
- DOE's Commercial Refrigeration Equipment Energy Conservation Standards Rulemaking, Docket No. EERE-2010-BT-STD-003;
- DOE's Walk-in Coolers and Walk-in Freezers Energy Conservation Standards Rulemaking, Docket No. EERE-2008-BT-STD-0015; and
- EPA's Protection of Stratospheric Ozone: Listing of Substitutes for Refrigeration and Air Conditioning and Revision of the Venting Prohibition for Certain Refrigerant Substitutes, Docket No. EPA-HQ-OAR-2013-0748-0001

All of these regulatory actions demand significant industry analyses and resources concurrent to EPA's request for comments on its SNAP proposal subject to this extension request. As a result, we believe that an extended comment period is both appropriate and justified. EPA's final SNAP determinations are not subject to any judicially mandated time limit, allowing the Agency the flexibility to provide such an extension to help ensure that it receives

the full benefits of more complete and thoughtful comments and a more robust docket for its final rulemaking.

In light of these issues, we ask that EPA provide a 60-day extension of the comment period to December 5, 2014, so as to provide the public with sufficient time to review and comment on EPA's August 6, 2014 proposed SNAP rulemaking.

Thank you for your consideration of this request. If you have questions or need to contact any of the following organizations, please call or email Charlie Souhrada at NAFEM ((312) 821-0201, csouhrada@nafem.org).

Very truly yours,

American Beverage Association (ABA)
Air-Conditioning, Heating & Refrigeration Institute (AHRI)
Association of Home Appliance Manufacturers (AHAM)
National Automatic Merchandising Association (NAMA)
North American Association of Food Equipment Manufacturers (NAFEM)

cc.
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