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April 18, 2019

The Honorable William Wehrum
Assistant Administrator
U.S. Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Transmitted via email

**Re: Docket ID# EPA-HQ-OAR-2018-0775
Request for an Extension of Period to Provide Public Comment for the Modifications to Fuel Regulations to Provide Flexibility for E15; Modifications to RFS RIN Market Regulations Rulemaking.**

Dear Assistant Administrator Wehrum,

EPA published a Proposed Rulemaking in the Federal Register on March 21, 2019 to extend the 1.0 psi RVP waiver to ethanol blends up to 15 volume percent and to make modifications to the RIN program with comments due April 29, 2019. This is a broad and complex rulemaking. As such, API requests an extension of EPA's comment period for an additional 30 days to allow stakeholders the opportunity to fully evaluate the proposal. The extension of the 1.0 psi RVP waiver for E15 is contrary to EPA's statutory authority under the Clean Air Act. The Proposed Rulemaking also includes changes to multiple components of the RFS that will affect all participants in the RIN program.

EPA's revised interpretation of the 1.0 psi RVP waiver under CAA 211(h)(4) and the new approach to consider E15 "substantially similar" to gasoline under the CAA 211(f) requirements are not consistent with the plain reading of the statute. The legal arguments are complex and create uncertainty about long established precedents related to fuel regulation. In addition, the RIN Reform proposals are equally complex. EPA states that there is no evidence of market manipulation. The proposed changes to the RIN program could have negative consequences without achieving the intended benefits.

In past rulemakings of this magnitude, it has been customary to allow a 60-day comment period. We believe it is more important for the EPA to receive quality feedback enabled through a 60-day comment period rather than a shorter rushed process.

Please let me know if you have any questions, and API and our member companies appreciate your consideration of this request.

Sincerely,

Frank J. Macchiarola
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