



September 5, 2018

**VIA ELECTRONIC FILING**

AP-42, Section 508  
Environmental Protection Agency  
efcomments@epa.gov

**Re: Request for Extension of Comment Period on Proposed Revisions to AP-42 Chapter 7, Section 7.1 – Organic Liquid Storage Tanks**

To Whom It May Concern:

The GPA Midstream Association respectfully requests a 60-day extension of the comment period on EPA's proposed revisions to AP-42 Chapter 7, Section 7.1 – Organic Liquid Storage Tanks.

GPA Midstream has served the U.S. energy industry since 1921 as an incorporated non-profit trade association. GPA Midstream is composed of nearly 100 corporate members that are engaged in the gathering and processing of natural gas into merchantable pipeline gas, commonly referred to in the industry as "midstream activities." Such gathering and processing facilities include several storage vessels that hold both hydrocarbons and produced water. As such, GPA Midstream members will be directly affected by the revisions to the AP-42 emission factors for Organic Liquid Storage Tanks.

The proposed revisions to AP-42 Chapter 7, Section 7.1 were published online on July 25, 2018 with comments due on September 24, 2018. GPA Midstream is requesting an extension of 60 days. With the public holidays on November 22<sup>nd</sup> and November 23<sup>rd</sup>, GPA Midstream proposes EPA push the comment due date back to Monday, November 26, 2018. This will give additional time necessary to fully evaluate the impact of these highly technical revisions to the AP-42 emission factors. Further, since these proposed revisions to AP-42 Chapter 7, Section 7.1 were not included in the federal register, GPA Midstream was not made aware of these revisions when they were originally published online, which reduced the amount of time to review and comment effectively.

GPA Midstream Association  
Sixty Sixty American Plaza, Suite 700  
Tulsa, Oklahoma 74135  
(918) 493-3872

GPA Midstream has worked collaboratively with EPA for many years and appreciates the opportunity to continue working with EPA on regulations affecting the midstream industry segment. GPA Midstream is standing by to provide further information or answer any questions.

We appreciate the agency's consideration of our request to extend the comment period 60 days and look forward to working with the agency on the final rule. If you have questions, please contact me at (202) 279-1664 or by email at [mhite@GPAglobal.org](mailto:mhite@GPAglobal.org).

Sincerely,

Matthew Hite  
Vice President of Government Affairs  
GPA Midstream Association