



February 10, 2017

VIA ELECTRONIC FILING

David Turk
Regulatory Development Branch
Office of Pollution and Toxics (7410M)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Request for Extension of Comment Period on EPA-HQ-TRI-2016-0390; addition of Natural Gas Processing Facilities to the Toxics Release Inventory

Dear Mr. Turk:

The GPA Midstream Association respectfully requests a 60 day extension of the comment period on EPA's proposed revision to add Toxics Release Inventory (TRI) reporting requirements under Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) to natural gas processing plants.

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 processing includes the removal of impurities from the raw gas stream produced at the wellhead as well as the extraction for sale of natural gas liquid products (NGLs) such as ethane, propane, butane, and natural gasoline or in the manufacture, transportation, or further processing of liquid products from natural gas. GPA Midstream membership accounts for more than 90% of the NGLs produced in the United States from natural gas processing. As such, GPA Midstream members will be directly affected by this rule.

The proposed rule was published on January 6, 2017 with comments due March 7, 2017. GPA Midstream is requesting an extension of 60 days which pushes the comment due date back to May 6, 2017. This will give additional time necessary to fully evaluate the impact of this regulation on our operations and how this may be duplicative to information already reported by natural gas processing plants. Pushing this deadline into the second quarter will give relief to natural gas plant operators heavily burdened with annual reporting requirements, mostly due at the end of the first quarter. Sufficient time should be given to adequately address these requirements. Also, in light of an administration change, this will give the new EPA administration time to evaluate the merits of this proposal more thoroughly as well.

GPA Midstream Association
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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 .

Sincerely,

Matthew Hite
Vice President of Government Affairs
GPA Midstream Association