From:	INAHARA Jill
To:	GARTENBAUM Andrea; FELDON Leah
Cc:	VANDEHEY Maggie
Subject:	RE: RM-AQPerm - extended public notice
Date:	Tuesday, May 20, 2014 8:48:08 AM

I'd prefer to say we are extending the deadline upfront and save the resources of doing it again later.

From: GARTENBAUM Andrea
Sent: Monday, May 19, 2014 5:31 PM
To: FELDON Leah; INAHARA Jill
Cc: VANDEHEY Maggie
Subject: RE: RM-AQPerm - extended public notice

I think I'd spend an hour.

Something to consider in your decision: Statute requires that we notify interested parties no later than 21 days before the new comment deadline. For example, if the comment deadline is July 21, and on July 14 we give notice that we're extending the comment deadline, the new deadline can be no sooner than August 4.

We'd update the documents, our website and our records. We'd send an email to GovDelivery subscribers, EPA and the permit holders with email addresses. However, I'm pretty sure it's optional to notify Legislators and send permit holders a postcard announcing the extension (the 500 people without email addresses). I'd want to research this.

Andrea

From: FELDON Leah
Sent: Monday, May 19, 2014 3:40 PM
To: INAHARA Jill; GARTENBAUM Andrea; VANDEHEY Maggie
Subject: RE: RM-AQPerm - extended public notice

How many hours of work is this?

From: INAHARA Jill
Sent: Monday, May 19, 2014 2:50 PM
To: FELDON Leah; GARTENBAUM Andrea; VANDEHEY Maggie
Subject: RE: RM-AQPerm - extended public notice

If we extend the notice period, then we have to send out another notice to everyone, GovDelivery and postcards……..

From: FELDON Leah
Sent: Monday, May 19, 2014 11:13 AM
To: INAHARA Jill; GARTENBAUM Andrea; VANDEHEY Maggie
Subject: RE: RM-AQPerm - extended public notice

Good idea. I don't know the exact APA rule on extending comment periods. We should look at

that first. We may have to be careful not to sound like we are pre-empting the ability to request an extension if one is already provided. We can language it in a way to make clear though that we already consider this an extended public comment period, which may help us when we get the request and want to consider denying it.

The other option is not to have an extended period and let the request come in knowing we will allow it. We can prepare for the lengthier period and still accept the request (everyone is happy).

From: INAHARA Jill
Sent: Monday, May 19, 2014 10:52 AM
To: GARTENBAUM Andrea; VANDEHEY Maggie
Cc: FELDON Leah
Subject: RM-AQPerm - extended public notice

Hi everyone,

The public notice on the Kitchen Sink is 6.5 weeks. Should we say somewhere in the notice that we are NOT going to extend the public notice period since we are already providing for a longer than usual public notice? I want to pre-empt people from asking for an extension.

Thank you,
Jill