

January 23, 2020

Mr. Craig Van Buren, Chair  
National Conference of Weights and Measures  
Via email: [vanburenc9@michigan.gov](mailto:vanburenc9@michigan.gov)

Mr. Ethan Bogren, Chair  
Laws & Regulations Committee  
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Mr. Bill Striejewske, Chair  
Fuels and Lubricants Subcommittee  
National Conference of Weights and Measures  
Via email: [WSTRIEJEWSKE@AGRI.NV.GOV](mailto:WSTRIEJEWSKE@AGRI.NV.GOV)

Dear Chairs:

I am writing to make you aware of my disagreement to the proposals: Block 4 (MOS 20.2, FAL 20.3) and FAL 20.2, that have been submitted to the National Conference on Weights and Measures (NCWM) for consideration. In my opinion, these proposals have been submitted without any data for justification. These proposals only lead to state enforcement of a small set of federal requirements on fuels.

Testing the finished fuel ultimately determines if the product meets specifications. Handbook 130 is up to date and currently references the specifications of the finished fuel. Requiring documentation of the components used to mix/blend a fuel do not determine nor guarantee that the final product meets specifications.

Asking Weights and Measures officials to require these documents will duplicate the EPA compliance program and put a burden on inspectors.

I would like to point out that EPA will not find one in violation if product transfer documents are available showing that the correct components were used. The RVP can be out of specification but not in violation.

These suggested changes do not protect the consumer, nor do they ensure the finished fuel meets EPA's RVP requirements and ASTM specifications. These changes would only make Handbook 130 more complicated. It should also be noted that EPA is constantly updating product transfer document requirements and will require handbook 130 to be updated often.

Once again, testing the finished fuel ultimately determines if the product is in specification and is the only way to protect the consumer. The EPA already has a sampling and testing program in place.

I am requesting that you strongly consider withdrawing these items.

Respectfully submitted,



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