



American
Petroleum
Institute

Prentiss Searles
Marketing Issues Manager
API
202-682-8227
searlesp@api.org

September 24, 2021

Mr. Garrett Cooper
Chairman WWMA Laws and Regulations Committee
San Diego County, California

Delivered electronically to: garrett.cooper@sdcounty.ca.gov

Subject: *Block 4*

MOS-22.1, Section 2.20.2. Documentation for Dispenser Labeling Purposes. and 2.20.3. EPA Labeling Requirements.

FAL-22.1, Sections 2.1.2. Gasoline-Ethanol Blends., 2.20.3. EPA Labeling Requirements., 3.2.5. Documentation for Dispenser Labeling Purposes, and 3.2.6. EPA Labeling Requirements.

Dear Mr. Cooper:

I write in support of Block 4 (*MOS-22.1* and *FAL-22.1*) submitted by the Fuels and Lubricants Subcommittee. API believes that adopting the proposed change will ensure that NIST Handbook 130, Method of Sale and Fuels and Automotive Lubricants Regulations, reflect the proper citation to the U.S. Environmental Protection Agency fuels rules.

When the U.S. EPA finalized the Streamlining rules, they indicated that they would no longer maintain a website that includes the 40 CFR 80 rules but will only have references to the new rules at 40 CFR 1090. Further, during the FALS meeting held in advance of the NCWM's Annual meeting in July 2021, there was nearly unanimous consent that the changes proposed by the workgroup tasked with reviewing the EPA changes were editorial in nature. We encourage you to adopt the changes proposed in L&R Block 4.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Electronically signed: *Prentiss Searles*

cc: Don Onwiler, National Conference on Weights and Measures (don.onwiler@ncwm.net)

WWMA Laws and Regulations Committee Members