

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: MOS-22.5, Section 2.31.2.1. Labeling of Grade Required. and 2.31.2.2. EPA Labeling Requirements Also Apply

Dear Mr. Cooper:

I am writing in support of MOS 22.5 submitted by the National Biodiesel Board. API believes that making this change will bring NIST Handbook 130, Method of Sale, up to date to reflect the federal labeling requirements. As a friendly amendment, we would suggest deleting the reference to the EPA labeling requirements as it is unclear what specific paragraph the reference would cite. To that end, we would support adding a cite to the paragraph within the FTC rule (i.e., 16 CFR 306.10) as it would assist the users of HB 130 to easily find the appropriate paragraphs within the FTC regulations.

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