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Laws & Regulations Committee
c/o Judy Cardin, Chairwoman
Wisconsin Weights & Measures
PO Box 8911
2811 Agriculture Drive
Madison, WI 53708-8911

Fuels and Lubricants Subcommittee
c/o Ronald G. Hayes, Chairman
Missouri Weights & Measures
PO Box 630
1616 Missouri Boulevard
Jefferson City, MO 65102

**Re: 2012 Interim Meeting – NCWM Publication 15: Item 237-1
NIST Handbook 130 – Uniform Engine Fuels and Automotive Lubricants Regulation, Section
2.1.2 – Gasoline-Oxygenated Blends**

Dear Committee Chairs:

I write today to clarify and expand on the American Petroleum Institute's (API) comments made at the Fuels and Lubricants Subcommittee (FALS) Meeting during the 2011 Annual NCWM Meeting in Missoula, Montana regarding changes to Handbook 130 Section 2.1.2 Gasoline-Oxygenated Blends.

The current NIST Handbook 130 provides a 1.0 psi RVP allowance for 9-10 vol% ethanol during EPA RVP control period (summer) and a 1.0 psi RVP waiver during the remainder of the year for blends of 1-10 vol% ethanol. At the 2011 NCWM Annual Meeting, the FALS provided a new draft proposal that would simply reference the ASTM standard and delete Sections 2.1.2 and 2.1.3.

Removal of the 1 psi RVP waiver for non-VOC gasoline by NCWM would reduce the available gasoline pool by an estimated 2.5 vol%. Additionally, the current 1 psi RVP waiver for E10 has been in Handbook 130 for nearly 20 years, and allowing it to remain preserves the status quo. This waiver has been thoroughly vetted by the states and industry. It was supported by state regulators, the automotive industry and the ethanol industry.

By the end of this January, NIST Handbook 130 and ASTM D4814, Standard Specification for Automotive Spark-Ignition Engine Fuel, will be harmonized for two of the three volatility properties: T 50 min and TV/L = 20. It is requested that for the third volatility property, RVP, the 1.0 psi RVP waiver for non-VOC gasoline be allowed to remain in place until ASTM takes action.

API appreciates the opportunity to provide these further comments, and would be pleased to provide additional information regarding our views on this proposal. Please contact me at (202) 682-8172 if you have any questions.

Sincerely,

Brian Knapp