



Western States Petroleum Association
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Gina Grey, Vice President, Strategic Policy, Fuels, Southwest and Hawaii Regions

January 17, 2013

Clerk of the Board, Air Resources Board

101 I Street

Sacramento, CA 95814

Via electronic mail to <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: **CARB January 25th Board Hearing – Consider Amendments to the Regulations for Gasoline and Diesel Fuel Test Methods**

Dear Clerk of the Board:

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide comments on the above-referenced CARB Board hearing item dealing with amendments to the test methods for fuels. WSPA is a non-profit trade association representing twenty-seven companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and five other western states.

In general, WSPA is supportive of the updates to the test methods, including adoption of the new method for trace oxygenates in gasoline (ASTM D7754-11).

WSPA has two issues regarding the proposed amendments. There is a concern with the effective date of the regulatory changes, since our members in many cases will need to purchase or modify testing equipment which typically can take months to accomplish based on procurement timelines. In addition, we would like to see a period of time allowed to transition to the new methods beyond a potential Office of Administrative Law (OAL) approval date.

Therefore, WSPA requests:

- First, that the ARB revise the regulatory proposal to state a date certain for the implementation of all test method revisions. In other words, a specific date would be approved for regulatory implementation, rather than the effective date being OAL approval which only has a maximum period of time allowed for review, but is otherwise unknown. This additional certainty would be beneficial.
- Second, in terms of the trace oxygenate test method, that ARB ensure the effective date also be stipulated in the revisions as a date certain, but that this date be close to the end of 2013. The reason for this specific request is due to the need on the part of some of our members to modify/purchase equipment and the additional time would be appreciated.

WSPA would be happy to provide additional clarification, and if you have questions please contact me at 480-595-7121.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gina Gray". The signature is written in black ink on a white background.

c.c. P. Rieger – ARB
J. Cohan – ARB
D. Lum - ARB