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Administrator Lisa Jackson
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, DC 20460

Subject: Comments on EPA's proposal on an alternative test method for gasoline olefins
Docket EPA-HQ-OAR-2008-0558

Dear Administrator Jackson:

NPRA, the National Petrochemical and Refiners Association, is pleased to provide comments on the Agency's proposal to approve the use of ASTM D6550 as an alternative test method for determining gasoline's olefins content (76 FR 5319, 1/31/11). NPRA represents high-tech American manufacturers, fueling and building America's future. NPRA members produce virtually all the refined petroleum products and petrochemicals manufactured in the United States, serving the American people responsibly and effectively. These manufacturers provide jobs directly and indirectly for 2 million Americans, economic and national security, and thousands of vital products to families and businesses throughout the United States.

NPRA supports this proposal to permit the use of ASTM D6550 as an alternative test method for determining the olefin content in gasoline. Refiners have reported the olefin content for gasoline to EPA for over 15 years.

NPRA agrees that alternative test methods must be calibrated to the EPA-designated test method.

EPA should use the latest version of ASTM test methods in its regulations in 40 CFR Part 80. This proposal cites the 2005 version of ASTM D6550 and the 2003 version of ASTM D1319. This new regulation should reference the latest version of ASTM test methods. Alternatively, the Agency should use the 2010 versions of both test methods in this new regulation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory M. Scott", is written over a white background.

Gregory M. Scott

cc: Docket EPA-HQ-OAR-2008-0558