

Joint Comments on E15 Education and Outreach

January 29, 2019

To: U.S. Environmental Protection Agency
Office of Transportation and Air Quality
2000 Traverwood Drive
Ann Arbor, MI 48105

Re: Modifications to Fuel Regulations to Provide Flexibility for E15; RIN 2060-AU34

The Outdoor Power Equipment Institute (OPEI) and the National Marine Manufacturers Association (NMMA) appreciate the opportunity to provide background information on the need for EPA to strengthen its Misfueling Mitigation Program (MMP) at the same time the agency proposes to allow fuel containing 15 percent ethanol (E15) to be sold year-round.

OPEI is an international trade association representing the manufacturers and their suppliers of small engines, utility vehicles, personal transport vehicles, golf cars and consumer and commercial outdoor power equipment. These products are commonly found in most American households and include products such as lawnmowers, garden tractors, trimmers, edgers, chain saws, snow throwers, tillers, leaf blowers, generators, and power washers. While small engines and outdoor power equipment consume a small percentage of the nation's fuel supply, their ownership by the American consumer is ubiquitous. Additionally, many of these same products are made for commercial use by contractors, farmers, utility crews, parks and recreation, states and municipalities, and fire and emergency rescue personnel. Many of these products have long service lives which can exceed a decade, resulting in an estimated 250 million legacy products currently in use. Our industry contributes approximately \$16 billion to annual U.S. GDP and employs some 150,000 people across 50 states.

NMMA is the leading recreational marine industry trade association in North America, representing 1,500 boat, engine, and accessory manufacturers. NMMA members collectively produce more than 80 percent of the recreational marine products sold in the

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United States. Recreational boating is a significant driver of the country's economy, employing 691,000 people across more than 35,000 boating businesses, while contributing \$170 billion in economic activity. What's more, 142 million recreational boaters take to the water annually in the U.S., consuming about 2.1 billion gallons of gasoline.

EPA's modifications to existing fuel regulations to allow E15 to be sold year-round are deeply concerning to the outdoor power equipment and recreational boating industries, due to the negative impact of higher-ethanol blend fuels on outdoor power equipment, marine engines and vessels, and consumers. E15 is not approved for use in these non-road engines¹ and EPA has established a Misfueling Mitigation Program (MMP) to reduce the likelihood of E15 blend fuels from being used in engines for which that fuel is not approved.² However, as OPEI and NMMA have each explained in detailed comments submitted to the agency on previous rulemakings, additional mechanisms are required to fully prevent misfueling of non-road engines. Without a more comprehensive misfueling mitigation program in place, expanding the availability of E15 will significantly increase the risk of damage to non-road engines. OPEI and NMMA therefore request that EPA include in its proposal measures to address the continued need for robust consumer education and outreach on E15 usage and impacts on non-road engines. These comments address the need for such additional education and outreach and also provide suggested preamble language that could be included in the agency's notice of proposed rulemaking.

Use of E15 and Higher Ethanol Blends Fuels in Non-Road Engines will Damage those Engines and Cause Harm to Manufacturers and Consumers

Use of E15 in non-road engines has both adverse environmental and economic consequences. The additional oxygen content of higher ethanol blend fuels produces a significant increase in engine temperatures that results in increased engine wear and ultimately engine failure. Further, the increased amount of ethanol causes increased corrosion of both metallic and rubber and plastic components. This in turn leads to

¹ 75 Fed. Reg. 68,094 (Nov. 4, 2010).

² 40 C.F.R. Part 80, Subpart N—Additional Requirements for Gasoline-Ethanol Blends.

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performance degradation, emission increases, engine failure, and potential fuel leaks as rubber and plastic components no longer form a complete seal. Based on studies conducted in conjunction with the U.S. Department of Energy, use of E15 in marine engines results in emissions increases outside of EPA certification limits, increased fuel consumption, and damage severe enough to prevent engines from completing the EPA durability testing process.³ Testing conducted on small non-road engines also identified problems related to E15 use, including leaner engine operation, higher operating temperatures, higher operating speed, and unintentional clutch engagement.⁴ Based on these studies and others, EPA has prohibited the use of E15 in small off-road engines, such as those used in lawnmowers, tractors, utility vehicles, trimmers, chain saws, and other lawn and garden equipment. EPA also prohibited the use of E15 in marine engines and other non-road equipment.⁵ Attached to these comments are additional materials previously provided to EPA regarding the effects of E15 and other ethanol blends on non-road engines. Increasing the availability of E15 likewise increases the risk that consumers will choose the wrong fuel for use in their non-road products, increasing the economic and environmental harms from misfueling of non-road engines. For marine engines, the potential for engine failure due to use of E15 presents the additional safety risk of leaving boaters stranded on the water.

Recent Polling Data Suggests that Widespread Consumer Confusion Continues Regarding the Use of E15 and other Ethanol Blends in Non-Road Engines.

Even though EPA has prohibited the use of E15 in non-road engines, misfueling continues and consumers remain confused about the fuels that are appropriate for use in their non-road and marine engines. A Harris Poll conducted in 2018 on behalf of OPEI concluded that more consumers are using the wrong type of fuel in their products. In 2018, 11% of those surveyed reported using E15, E30, E50, or E85 to fuel their equipment, up from 7% in 2015. The study found that Americans are more likely now

³<http://www.nmma.org/assets/cabinets/Cabinet515/Marine%20Biobutanol%20Research%20Book%20SFS2.compressed.pdf>

⁴ See, e.g., Comments of Dr. Ron Sahu on “Effects of Intermediate Ethanol Blends on Legacy Vehicles and Small Non-Road Engines, Report 1 – Updated,” NREL/TP-540-43543 and ORNL/TM-2008/117, Feb. 2009

⁵ See 75 Fed. Reg. 68,094.

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than in years past to believe higher ethanol blends of gasoline are safe for any gasoline (i.e., non-diesel) engine (38% in 2018 vs. 31% in 2017, 31% in 2016, and 30% in 2015). The Harris Poll also found that only 20% of consumers, down from 25% in 2017, say they notice the ethanol content at a gas pump. When asked about the label required under the current EPA MMP, more than 3 in 5 Americans (63%) feel it is inadequate to inform consumers about E15 fuel being illegal to use in outdoor power equipment.

Outdoor power equipment products are also unique because they are often fueled from portable containers, which are typically fueled at the same time and location as the vehicle used to transport the container from the filling station to the off-road equipment location. In fact, many types of non-road products, including lawn, garden, and forestry products and off-road vehicles like ATVs and utility vehicles, are exclusively refueled from portable containers. Portable fuel containers have a range of opening sizes for refilling the container and any fuel dispensing nozzle that could be utilized to fill a vehicle can also be used to fill the portable container. Current pump labels may be effective in preventing misfueling of vehicles at the time of fueling, but may not clearly communicate the risk of using that same fuel to fill a portable container that will later be used to refuel nonroad equipment.

The fueling of boats also presents unique challenges. Approximately 95% of recreational boats are less than 26 feet in length and are capable of being—and often are—transported by trailer to water bodies. The vast majority of these boats are fueled at retail gas stations when being towed behind vehicles, rather than fueled at marinas. The risk of misfueling with E15 is therefore high, particularly if fuel pumps are not clearly labeled regarding ethanol content or effectively warn customers that E15 should not be used in marine engines.

The images in Attachment 1 ⁶show examples of current pump configurations and labeling. The sheer number of labels on these fuel pumps makes the ethanol content and warning labels difficult to locate and even more difficult to comprehend, particularly in

⁶ <https://spaces.hightail.com/space/dqYb9hZhQf>

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the few seconds consumers may spend deciding on the grade or type of fuel to purchase. As these photos show, label location also differs from pump to pump, so consumers cannot always expect to look to a standard location on the fuel pump to determine the ethanol content of a fuel before making purchasing decisions. Even if the current E15 warning label alone were sufficient to deter misfueling, the lack of standardized label placement and frequent placement above or below eye level or behind hoses significantly reduces its effectiveness. The photos in Attachment 1 also depict the advertisement of “Unleaded 88” fuel, which contains 15 percent ethanol but is labeled to appear to be an 88 octane gasoline. Although pumps dispensing “Unleaded 88” also carry the current E15 warning label, the signage and display of the fuel is confusing and misleading to customers. These changes in fuel marketing strategies and continuing consumer confusion about appropriate fuels for their vehicles and engines merit careful review by EPA and the establishment of a more robust misfueling mitigation program.

Industry Efforts to Educate Consumers about Fuel Choices are Effective but Must Be Supplemented with EPA Action and a Stronger Misfueling Prevention Program

In 2013, OPEI, in partnership with NMMA, launched a “Look Before You Pump” program. Both organizations have used “Look Before You Pump” materials and messaging with local and national dealers, service, and retail outlets to communicate the importance of using only approved fuels in non-road engines. NMMA has also partnered with boating safety and certification organizations, state boating associations, and national groups like BoatUS and the American Sportfishing Association to increase awareness about the need to use E0 or E10 fuel in marine engines. OPEI and NMMA have worked diligently for five years to raise awareness among outdoor power equipment and marine engine manufacturers, dealers, retail outlets, and owners about proper fueling. Despite this lengthy and concerted campaign, the polling data cited above demonstrates that industry efforts and the current EPA MMP are not sufficient to ensure that consumers are fully aware of the risks of fueling their non-road products with E15.

EPA also has a legal obligation to prevent use of E15 in engines for which the fuel is not approved. Under section 211(f) of the Clean Air Act (CAA), EPA may only waive the

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prohibition against the introduction into commerce of any fuel after the agency concludes that the fuel or fuel additive will not cause or contribute to engines or equipment failing to meet applicable emission standards over their useful life. Further, CAA section 211(c)(1) allows EPA to control the introduction into commerce, offering for sale, or sale of any fuel or fuel additive if such fuel or fuel additive, or any emission product of such fuel or fuel additive, causes or contributes to air pollution that endangers public health or welfare, or will impair the performance of an emission control device or system that is in general use. It is under these two provisions that EPA first issued the original MMP.⁷ The same two provisions obligate EPA to consider whether additional controls on the sale, or offering for sale, of E15 are necessary to ensure that use of the fuel does not cause or contribute to air pollution or impair the performance of emission control systems. Based on the polling data summarized above and provided in full in Attachment 2, the current MMP and industry stakeholder efforts are insufficient to mitigate against misfueling to the fullest extent practicable. Therefore, EPA must develop a broad outreach effort to increase consumer knowledge of the economic harm and environmental impacts that can result from use of E15 in outdoor power equipment and marine engines.

Misfueling of Marine and Outdoor Power Equipment Engines Causes Economic Harm to Consumers

The polling cited above found that consumers are increasingly using fuels with more than 10 percent ethanol to fuel their marine engines and outdoor power equipment. The result of misfueling is engines that perform poorly, or not at all, and which can pose safety risks to the user. An engine destroyed by use of E15 means that industries and individuals who rely on lawn and garden equipment, chain saws, snow blowers, and tillers may have equipment out of service; contractors, farmers, utility crews, parks and recreation departments, landscapers, states and municipalities, and fire crews may be unable to work if their equipment is not functioning. Because misfueling voids the manufacturer's warranty, the cost of replacing equipment damaged by E15 is entirely borne by the consumer. Many of these products can have service lives of up to 10 years or more if properly maintained but the cost of early replacement due to misfueling can have

⁷ 75 Fed. Reg. 44,406, 44,410 (July 25, 2011).

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significant economic consequences to individual consumers and to industries that rely on outdoor power equipment to perform their functions.

In the boating industry, approximately 64% of boat owners have annual household incomes below \$100,000. Replacing an engine that is damaged by E15 use can cost the consumer several hundred to several thousand dollars. Again, use of E15 voids the manufacturer's warranty so the entire cost of misfueling is shouldered by the consumer.

If E15 is permitted to be sold year-round, the rate of misfueling is likely to increase, along with the economic impact on the public. The economic costs of misfueling, and the need to protect consumers from the expense of replacing engines and equipment damaged by E15 use, weigh heavily in favor of a more comprehensive misfueling mitigation plan and increased customer awareness of the risks of E15 use. A coordinated effort by *all* stakeholders—including EPA—to educate consumers about the need to carefully select the fuel used in marine engines and outdoor power equipment is required.

Specific Recommendations for Reducing Misfueling and Improving Consumer Awareness about E15

First, EPA should request comment on whether changes should be made to the E15 label currently in use on fuel pumps dispensing that fuel. Specifically, NMMA and OPEI recommend that EPA request comment on whether the size, design, or other characteristics of the label should be changed to more clearly communicate the fuel's ethanol content to consumers. NMMA and OPEI also recommend that EPA request comments on the placement of labels in order to maximize the effectiveness of the label and increase consumer awareness of the fuel's ethanol content. EPA should also request comments on whether E15 pump labels should carry warnings in languages other than English in order to more broadly communicate the risk of fueling nonroad engines with E15. Additionally, EPA should also seek comment on whether specific changes are necessary to the labels used on E85, blender pumps, and pumps dispensing midlevel ethanol blend fuels, as well as labels for pumps dispensing E0 and E10 fuels.

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Second, EPA should request comment on whether to require physical barriers to be implemented that would reduce the risk of misfueling of engines for which the use of E15 is not approved. Specifically, NMMA and OPEI recommend that EPA request comment on whether to require fuel pumps dispensing E15 or higher-ethanol blends to be equipped with a key pad approval system that would be tied to payment method or fuel grade selection. A keypad system is NMMA and OPEI's preferred approach to a physical barrier to prevent misfueling. This system could require the consumer to confirm that she or he understands that the fuel contains more than 10% ethanol and cannot be legally used in non-road products due to the risk of substantial damage and/or voiding warranty coverage. In the 2011 MMP, EPA concluded that information available at that time did not support the adoption of a keypad or touch screen information display or confirmation requirement. However, due to the expanded availability of E15 and the likely increase in sale of E15 due to the recent RVO increases, this option is likely to be more cost-effective and feasible than when E15 volumes were significantly lower. OPEI and NMMA therefore recommend that EPA request comments on the potential cost of implementing such systems as well as the effectiveness in preventing misfueling of non-road engines. We recognize that implementing a keypad verification system imposes costs on fuel retailers. However, engine damage and replacement imposes significant costs on consumers that can be avoided if robust barriers are put in place to prevent misfueling in the first place.

NMMA and OPEI also recommend that EPA request comments on whether to consider adopting a different fuel pump nozzle size for those pumps dispensing E15. EPA previously rejected a different-sized nozzle as not feasible.⁸ However, at the time of the original MMP, EPA anticipated that the transition to E15 would take time and would not immediately be available across the country.⁹ Considering the current broad availability of E15 and the agency's intent to allow E15 to be sold year-round, EPA must reconsider whether physical barriers to use of E15 in engines for which use of that fuel is not approved would now be a more cost-effective solution to preventing misfueling. NMMA

⁸ See 75 Fed. Reg. at 44, 426.

⁹ *Id.*

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and OPEI recognize that requiring different-sized nozzles for E15 comes at a cost to fuel retailers. However, we strongly recommend that EPA balance the cost of implementing physical barriers to misfueling with the costs to consumers of replacing marine engines and outdoor power equipment due to damage from misfueling. The economic impact on fuel retailers alone should not be the only factor in determining whether physical barriers are a feasible option.

In addition, NMMA and OPEI recommend that EPA consider whether to require dedicated fuel pumps dispensing only fuels containing 10 percent or less ethanol. We believe that this is the only option that will completely mitigate against misfueling. Beyond the new products being sold each day, OPEI also estimates as many as 250 million legacy products owned by U.S. households and businesses, all of which require gasoline with no more than 10% ethanol to run properly and safely. It is also important to note that many of the commercial-grade and higher price point products manufactured by our members will likely be in service for decades to come. Similarly, recreational boats are designed and built to be used for decades. While newer marine engines are designed to operate on E10, approximately 16 million legacy marine engines remain in use that will be harmed by higher-ethanol blends. We therefore recommend that EPA propose to require the continued sale of E10 and E0 fuels, as well as require fuel retailers to maintain a dedicated pump for E0 or E10 gasoline.

Finally, NMMA and OPEI also recommend that EPA seek comment on other misfueling mitigation strategies that were deemed to have benefits outweighed by cost in the 2011 MMP final rule. Among these options were distinctive fuel pump hand warmers for E15 dispensers and RFID technologies.¹⁰ OPEI and NMMA recommend that EPA also request comment on any other measures that would reduce the risk of misfueling and increase customer awareness of the harm E15 poses to non-road engines.

Proposed Preamble Language on Consumer Education and Pump Labeling Requirements

¹⁰ 75 Fed. Reg. at 44,426-427.

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NMMA and OPEI respectfully provide the sample preamble language that could be included in EPA's notice of proposed rulemaking to explain the rationale for revising the MMP and solicit comment on what measures would be effective in increasing customer awareness of the risks of misfueling.

In 2010 and 2011, EPA determined that the use of E15 in some small engines will damage those engines and equipment.¹¹ EPA denied the E15 waiver request for non-road engines, vehicles, and equipment on the basis that “there are emission related concerns with the use of E-15 in non-road products, particularly regarding long-term exhaust and evaporative emission (durability) impacts and material compatibility issues.”¹²

Following the partial waiver prohibiting the use of E15 in these types of engines and equipment, EPA issued a misfueling mitigation rule.¹³ In this rule, EPA recognized its concerns with misfueling E15 into non-road products “include the potential for elevated exhaust and evaporative emissions, as well as the potential for emissions impacts related to engine failure from overheating.”¹⁴ We concluded that these emission related problems could potentially occur with enough frequency that the avoided emissions increases from reduced or prevented misfueling would more than outweigh the relatively low cost imposed by the required misfueling mitigation regulations.¹⁵ Therefore, the potential emission increases from misfueling supported the establishment of the original misfueling mitigation plan, even though a very low percentage of engines and products might experience misfueling or an increase in emissions.

At the time of the MMP, we anticipated that the introduction of E15 into the marketplace would likely start in a limited number of areas and grow over time before becoming broadly available. We also recognized that a public outreach

¹¹ 75 Fed. Reg. 68,094 (Nov. 4, 2010); 76 Fed. Reg. 4662 (Jan. 26, 2011).

¹² 75 Fed. Reg. 68,094, 68,137.

¹³ 76 Fed. Reg. 44,406 (July 25, 2011).

¹⁴ 76 Fed. Reg. at 44,409..

¹⁵ *Id.*

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campaign, in partnership with stakeholders, would be crucial to understanding how E15 would be distributed, sold, and used, and would provide a forum for identifying and resolving issues that developed as E15 moved into the marketplace.

Now that we are proposing to allow the sale of E15 year-round, EPA requests comments on whether EPA should adopt a more robust set of consumer education and pump labeling requirements. Effective outreach to consumers is essential to the successful extension of the year-round availability of E15 without increasing misfueling of those engines and equipment for which E15 use is not approved. Outreach to consumers is critical to help mitigate misfueling incidents that can result in increased emissions or vehicle or engine damage.

EPA recognizes concerns raised by industry stakeholders that the current misfueling mitigation plan may not be adequate to prevent misfueling of all engines for which the use of E15 is not approved. A Harris Poll conducted in 2018 on behalf of industry stakeholders concluded that misfueling of nonroad engines is increasing, rather than decreasing. According to stakeholder polling data, in 2018, 11% of those surveyed reported using E15, E30, E50, or E85 to fuel their equipment, up from 7% in 2015. The study found that Americans are more likely now than in years past to believe higher ethanol blends of gasoline are safe for any gasoline (i.e., non-diesel) engine (38% in 2018 vs. 31% in 2017, 31% in 2016, and 30% in 2015). The Harris Poll also found that only 20% of consumers, down from 25% in 2017, say they notice the ethanol content at a gas pump. When asked about the label required under the current EPA MMP, more than 3 in 5 Americans (63%) feel it is inadequate to inform consumers about E15 fuel being illegal to use in outdoor power equipment.

Because the use of a non-approved fuel voids the manufacturer's warranty, the cost of misfueling of marine engines and outdoor power equipment is primarily borne by the public. Beyond the cost of replacing engines that are damaged or

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destroyed by E15, misfueling can have broader economic impacts. Outdoor power equipment, including lawn mowers, tractors, chain saws, and generators are used by a variety of industries, including landscapers, farmers, contractors, parks and recreation departments, and fire crews. Inoperable equipment may mean that individuals and companies may be temporarily out of work or unable to perform certain jobs. Marine engines damaged by E15 also are not covered by the manufacturer's warranty, so the consumer bears the cost of replacement. Because of these economic impacts, EPA believes that amending the current MMP is required.

First, EPA requests comment on whether changes should be made to the E15 label currently in use on fuel pumps dispensing that fuel. Specifically, EPA requests comment on whether the size, design, or other characteristics of the label should be changed to more clearly communicate the fuel's ethanol content to consumers. EPA also requests comments on the placement of labels in order to maximize the effectiveness of the label and increase consumer awareness of the fuel's ethanol content. EPA also requests comments on whether E15 pump labels should carry warnings in languages other than English in order to more broadly communicate the risk of fueling nonroad engines with E15.

In addition to labels on E15 pumps, EPA also seeks comment on whether E85, blender pumps, and mid-level ethanol blend pumps should have labels indicating that such fuels should not be used in nonroad engines. As with the E15 label, EPA seeks comment on the size, design, language, placement on pumps, and other characteristics of the label that would clearly communicate the fuel's ethanol content and the engines in which the fuel is authorized for use.

Second, EPA requests comment on whether we should require physical barriers to be implemented that would reduce the risk of misfueling of engines for which the use of E15 is not approved. Specifically, EPA requests comment on whether we should require fuel pumps dispensing E15 or higher-ethanol blends to be

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equipped with a key pad approval system that would be tied to payment method or fuel grade selection. This system could require the consumer to confirm that she or he understands that the fuel contains more than 10% ethanol and cannot be legally used in non-road products due to the risk of substantial damage and/or voiding warranty coverage. EPA requests comment on the potential cost of implementing such systems as well as the effectiveness in preventing misfueling of non-road engines.

In addition, EPA requests comments on whether we should consider adopting a different fuel pump nozzle size for those pumps dispensing E15. In the past, EPA concluded that requiring a different nozzle size for pumps dispensing E15 was not a cost-effective method of preventing misfueling in light of the relatively slow and region-by-region adoption of E15 fuels. We seek comment on whether the year-round availability of E15 will significantly increase the risk of misfueling to the point that implementing differently-sized fuel pump nozzles would now be a cost-effective method of preventing misfueling.

Third, EPA requests comment on the type of public outreach and consumer education program, beyond fuel pump labeling and physical barriers, that would be effective in mitigating misfueling. EPA also requests comments on the appropriate stakeholders that should be involved in the development of this agency-led outreach effort. In the context of this program, potential key stakeholders include ethanol producers, fuel manufacturers, automobile, engine and equipment manufacturers, States, non- governmental organizations, parties in the fuel distribution system, EPA, DOE, and USDA. EPA requests comment on potential education and outreach activities a public/private group could undertake, include serving as a central clearinghouse for technical questions about E15 and its use, promoting best practices to educate consumers or mitigate misfueling instances, and developing educational materials and making them available to the public.

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In comments on EPA's MMP, some stakeholders suggested that a Web site be created to inform consumers of the potential impacts of E15 on older motor vehicles, heavy-duty gasoline engines and vehicles, motorcycles, and nonroad products. Stakeholders have further suggested that, if a unique misfueling Web site is created, then EPA should require the Web site address to be displayed on the E15, E85, and midlevel ethanol blend pump labels. EPA seeks comment on the appropriateness of a unique misfueling Web site and of including such a Web site address on these labels. Many of these efforts have already been taken by industry stakeholders. EPA seeks comment on how current industry efforts can be adapted to further the agency's goal of reducing misfueling.

Finally, EPA requests comment on whether to mandate the continued availability of fuels containing 10 percent or less ethanol. We also seek comment on whether to require fuel retailers to maintain a dedicated fuel pump to dispense E10 or E0 gasoline.

We also seek comment on any other measures not proposed in the rule that the regulated industries and other interested parties feel may be necessary to mitigate misfueling. We seek comment on any other cost-effective mitigation measures that may be appropriate. If EPA considers requiring any other mitigation measures that are suggested by commenters in the final rule, EPA will conduct appropriate analyses of such measures, including the impacts on small businesses, before deciding whether to include such mitigation measures in the final rule.

Conclusion

OPEI and NMMA appreciate the opportunity to provide the foregoing comments and background information to inform EPA's proposal to allow E15 to be sold year-round. Attached to these comments is additional background information regarding the effects of E15 on outdoor power equipment and marine engines. Please contact Dan Mustico at

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Sincerely,



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