

SUSAN M. COLLINS
MAINE

413 DIRKSEN SENATE OFFICE BUILDING
WASHINGTON, DC 20510-1904
(202) 224-2523
(202) 224-2693 (FAX)

United States Senate

WASHINGTON, DC 20510-1904

December 14, 2009

COMMITTEES:
HOMELAND SECURITY AND
GOVERNMENTAL AFFAIRS,
RANKING MEMBER
APPROPRIATIONS
ARMED SERVICES
SPECIAL COMMITTEE
ON AGING

The Honorable Lisa Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Room 3000
Washington, D.C. 20460

Dear Administrator Jackson:

We are writing to commend your recent decision to delay acting on Growth Energy's petition calling for the introduction of mid-level ethanol fuel blends (i.e., blends of gasoline with fuel ethanol concentrations greater than 10 percent) into the marketplace before adequate testing is complete. In your recent testimony before the Environment and Public Works Committee you stated that the Environmental Protection Agency did not have sufficient data to act on the petition; only two automobile engines, both manufactured since 2001, had been tested with mid-level ethanol blends and additional testing was necessary before determining how to respond to the petition. We agree that more rigorous and thorough testing of mid-level ethanol fuels is needed before these fuels become commonplace at filling stations across the country.

There are lessons to be learned from our unsuccessful attempt to use boutique fuels to address regional air quality issue in the 1990s. Allowing mid-level ethanol fuel blends that are only suitable for newer automobiles adds an entirely new level of logistics and market complexity for fuel retailers and consumers to deal with. Not only would filling stations need to carry a variety of fuels with different octane levels, but also they would need to provide facilities with various fuel blends. The continued market demand for fuels with lower concentrations of ethanol creates additional challenges for filling stations to ensure adequate product availability for their customers. This was a particularly challenging issue for fuel retailers during the boutique fuel blends experiment of the last decade.

Fuel purchased at the pump is used to power more than just cars, and not just cars built in the last eight years. The impacts of mid-ethanol fuel blends on small engines must also be thoroughly evaluated in EPA's tests. Currently, motor fuels can contain no greater than 10 percent ethanol (E10). While sophisticated modern automobile engines usually can burn E10 and other gasoline-ethanol blends successfully, older automobiles, small aircraft, and simple engines used in off-road applications (e.g., marine, All terrain vehicles and snowmobile engines) as well as small engines that power common yard and landscaping equipment (e.g., leaf-trimmers, lawn mowers, chainsaws, etc.) have had significant difficulties running on E10. There are hundreds of millions of these engines in use in the United States today. Replacing E10 with fuels containing an even greater concentration of ethanol could make matters worse. Equipment damage due to ethanol-gasoline blended fuels can pose both safety hazards and significant financial hardship for operators.



PRINTED ON RECYCLED PAPER

The U.S. Coast Guard, in its review of the Growth Energy waiver request, noted that the majority of the recreational boat fleet is more than ten years-old. These older vessels were not designed to accommodate ethanol blended fuels. It noted that fuel leaks caused by fuel system deterioration, already being reported by users of E10, could be expected to increase in severity if the amount of ethanol exceeded 10 percent and cause an unacceptable level of risk for fire and explosion. Another marine safety problem was experienced by a Maine boater when, after his boat was fueled with E10 without his knowledge, the engine failed when he was far from shore. Also, reports have surfaced of unexpected gear engagement when chainsaws, designed to operate with gasoline, are used with E10.

The automobile industry has been concerned about the impact that increasing the ethanol content of ethanol-gasoline fuel blends will have on the long-term operability of the catalytic converters on their vehicles. Catalytic converters are essential to mitigating vehicle air pollution and assuring that vehicles comply with emissions standards set under the Clean Air Act. In addition to concerns about catalytic converters, vehicle users have concerns about the impacts ethanol-gasoline fuel blends have on vehicle performance.

We applaud your decision to wait until there is sufficient testing of mid-level ethanol blends before deciding whether to permit such fuels into commerce. We urge you to include in your test plans a representative sample of small engines in addition to motor vehicle engines to ensure that replacing E10 with new fuels containing greater levels of ethanol does not severely compromise the safety and performance of these engines and unnecessarily put people's safety and financial situations at risk.

Sincerely,



Susan M. Collins
U.S. Senator



Benjamin L. Cardin
U.S. Senator