

5-8-2009

TO: James Caldwell, Docket ID No. EPA-HQ-OAR-2009-0211, , Office of Transportation & Air Quality, EPA  
REF: Docket ID No. EPA-HQ-OAR-2009-0211

I am writing to strongly urge EPA to deny the petition submitted on March 6, 2009 by Growth Energy and 54 ethanol manufacturers requesting a waiver under Clean Air Act Sec. 211(f)(4) to allow ethanol-gasoline blends containing up to 15 percent ethanol by volume (E15). There is insufficient data to justify approving any increase in the ethanol blend limit, particularly for marine engines and recreational vessels for which there has been literally no testing done by EPA or the Department of Energy regarding durability, performance concerns, or emissions concerns associated with higher ethanol blends.

It is well-known that for marine and other small gasoline-powered engines that are designed, calibrated, and certified to run on not more than E10, higher concentrations of ethanol in fuel pose serious problems, including (1) Performance issues, such as drivability (i.e. starting, stalling, fuel vapor lock); (2) increased water absorption and phase separation of gasoline and water while in tank; (3) fuel tank corrosion, leading to oil/fuel leaks; (4) increased emissions, because the ignition of E15 creates a higher temperature than straight gasoline or E10; (5) damage to valves, push rods, rubber fuel lines and gaskets. All of these concerns raise significant safety issues with any increased ethanol blend, particularly for boaters who operate in harsh marine environments, often miles from shore.

EPA must thoroughly and comprehensively test recreational marine engines, fuel systems and components and demonstrate that E15 will not defeat marine engine air emissions devices, poses safety risks to boating consumers, bring engines out of warranty, or otherwise damage the more than 18 million recreational boats currently in operation in the United States prior to approving E15. To date, such testing has not been conducted, nor will it be conducted prior to the waiver deadline of December 31, 2009.

Additionally, EPA should not approve a "partial" or "conditional" waiver allowing E15 or other increased ethanol blends for only certain vehicles. This will cause enormous consumer confusion, misfueling, and put consumers and their products at risk. There is clearly insufficient scientific and technical data to justify granting the Growth Energy petition at this time. Again, EPA should deny this waiver petition unless and until sufficient testing is completed, and until it is affirmatively demonstrated that higher ethanol blends will not damage marine engines, their air emissions devices, or pose safety risks to consumers.

Thank you,  
Pleasure boaters on Lake of the Ozarks, MO  
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