



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY  
2565 PLYMOUTH ROAD  
ANN ARBOR, MICHIGAN 48105-2498

August 1, 2012

OFFICE OF  
AIR AND RADIATION

Mr. Wayne Allard  
Vice President, Government Relations  
101 Constitution Avenue, NW, Suite 800W  
Washington, DC 20001

Dear Mr. Allard:

Thank you for your June 20, 2012 letter expressing concerns with the possible misfueling of motorcycles and all-terrain vehicles (ATVs) with gasoline-ethanol blended fuels containing more than 10 volume percent (vol%) up to 15 vol% ethanol (E15). Specifically, you were concerned about the possibility of motorcycle and ATV riders inadvertently misfueling due to residual E15 left in a blender pump hose used to dispense both E15 and a gasoline-ethanol blended fuel containing no more than 10 vol% ethanol (E10). The Administrator has asked me to respond to your letter.

EPA appreciates your concern about residual fuel remaining in a blender pump hose that dispenses E15 and E10 from the same hose. EPA recognized the potential impact of E15 on nonroad vehicles, engines, and equipment when it denied the E15 Waiver Request for nonroad vehicles, engines, and equipment which includes motorcycles and ATVs,<sup>1</sup> and the Agency has specifically addressed this residual fuel issue in its recent approvals of the first E15 Misfueling Mitigation Plans (MMPs).<sup>2</sup> In the approval letters sent to companies submitting MMPs,<sup>3</sup> EPA requires that retail stations that own or operate blender pumps either dispense E15 from a dedicated hose and nozzle if able or, in the case of E15 and E10 being dispensed from the same hose, require that at least four gallons of fuel be purchased to prevent vehicles and engines with smaller fuel tanks from being exposed to gasoline-ethanol blended fuels containing greater than 10 vol% ethanol. Additionally, EPA is requiring that retail stations that offer E10 and E15 from the same hose and nozzle use additional labeling to inform consumers about the minimum purchase requirement. EPA also noted that some retailers may need to take additional steps to help ensure that consumers heed the minimum purchases requirements.

Since motorcyclists and ATV users, as you suggest, have relatively small fuel tanks, they should pay careful attention to the labeling of blender pumps to ensure that an appropriate fuel is chosen, in this case E10 or E0. As you are probably aware, the E15 Compliance Survey, required both as a condition of

<sup>1</sup> See 75 FR 68094 (November 4, 2010).

<sup>2</sup> For more information, please see the E15 Misfueling Mitigation Plan web site located at: <http://www.epa.gov/otag/regs/fuels/additive/e15/e15-mmp.htm>.

<sup>3</sup> A sample letter sent to approved MMP submitters may be found here: <http://www.epa.gov/otag/regs/fuels/additive/e15/documents/e15-mmp-approval-letter-sample.pdf>. Please note that this letter is only a sample and actual letters sent to companies may vary depending on a company's specific circumstances.

the E15 Partial Waiver Decisions<sup>4</sup> and EPA regulations found at 40 CFR 80.1502, will ensure that blender pumps are properly labeled. As we suggested in the E15 Misfueling Mitigation Rulemaking, we will closely follow the results of the E15 Compliance Survey to determine whether additional misfueling mitigation measures are necessary.

Again, thank you for your letter, and we look forward to working with you and other affected stakeholders to ensure that E15 is introduced into the marketplace safely and responsibly. If you have any questions or comments regarding this matter, please contact Robert Anderson of my staff at (202) 343-9718.

Sincerely,

A handwritten signature in blue ink, appearing to read "Byron Bunker".

Byron Bunker, Acting Director  
Compliance Division

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<sup>4</sup> See 75 FR 68150 (November 4, 2010) and 76 FR 68150-68151 (January 26, 2011).