



# Congress of the United States

House of Representatives

Washington, DC 20515

November 17, 2011

The Honorable Lisa Jackson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

Dear Administrator Jackson:

We are writing today to insist that the Environmental Protection Agency (EPA) delay the registration of fuels containing 15 percent ethanol (E15) until adequate testing has shown that E15 will not damage engines and that misfueling concerns have been fully addressed.

On June 1, 14 auto manufacturers were asked about the effects E15 on their engine operability. Without exception the manufacturers responded that the use of E15, even in their newest vehicles, would damage engines, void warranties, and reduce fuel efficiency. The original letter and the responses from the auto manufacturers are attached for your review.

Engine damage from E15 appears to be an even more significant risk in marine engines. In July 2009, The United States Coast Guard wrote to your agency to express its concerns with the introduction of higher ethanol blends. The Coast Guard argued that ethanol blended fuels were deteriorating components in the fuel system and causing fuel leaks. The letter went on to warn of the risk of fire and explosions:

Increasing the blend to E-15 can be expected to exacerbate any fuel system deterioration now being reported with E-10 blended gasoline. Fuel leaks such as those addressed above are a serious safety consideration because of the possibility of fuel accumulation in the bilges of these vessels causes an unacceptable level of risk for fire and explosion.<sup>1</sup>

A recent report from the National Renewable Energy Laboratory (NREL) raises additional concerns regarding the use of E15 in marine engines.<sup>2</sup> NREL studied the effects of E15 in three different marine engines and documented serious problems in each. The report found that E15 caused the engines to run at significantly higher temperatures, which resulted in damage to the engines' valves and pistons. According to NREL, after two months of exposure to E15, "the signs of deterioration were evident." Further, NREL found that the tested engines "had poor run quality (intermittent misfire or partial

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<sup>1</sup> Letter, United States Coast Guard to the Environmental Protection Agency (July 2, 2009).

<sup>2</sup> David Hilbert, A Study of the Effects of Running Gasoline with 15% Ethanol Concentration in Current Production Outboard Four-Stroke Engines and Conventional Two-Stroke, National Renewable Energy Lab (June 16, 2010 – June 30, 2011).

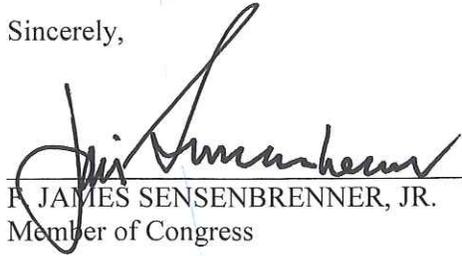
combustion events) when operated on E15 fuel after 300 hours of endurance.”<sup>3</sup> Indeed, one of the engines tested failed after 256 hours and could not even complete the durability tests.

While the EPA’s E15 partial waiver is only applicable to cars and trucks produced in 2001 or later, the EPA must understand that it does not regulate in a theoretical vacuum. Ethanol is currently cheaper than gasoline.<sup>4</sup> If E15 is registered by the EPA, then as with E10, it is likely to crowd out other fuels from the marketplace. Misfueling is not only inevitable, it may become unavoidable.

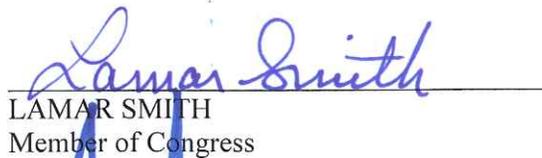
Furthermore, we do not believe that the EPA has sufficiently demonstrated that E15 is safe for cars and trucks manufactured after 2001. We are not alone in this concern. Recent testing by the Coordinating Research Council on engine durability showed that E15 could cause engine failure. Nonetheless, the EPA appears committed to allowing E15’s introduction despite mounting evidence of potential harm.

Again, we urge you to delay the registration of fuels with 15 percent ethanol until sufficient testing can be completed to demonstrate that E15 is in fact safe for engines and that misfueling can be avoided.

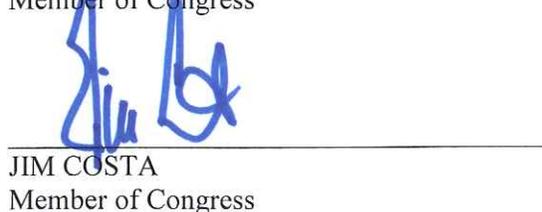
Sincerely,

  
F. JAMES SENSENBRENNER, JR.  
Member of Congress

  
GARY PETERS  
Member of Congress

  
LAMAR SMITH  
Member of Congress

  
DAN BENISHEK  
Member of Congress

  
JIM COSTA  
Member of Congress

  
PETER WELCH  
Member of Congress

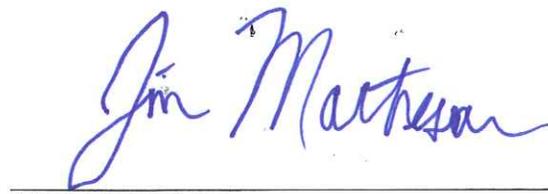
  
STEVE WOMACK  
Member of Congress

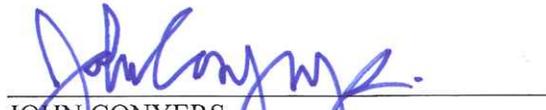
  
HENRY CUELLAR  
Member of Congress

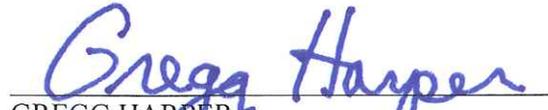
<sup>3</sup> *Id.*

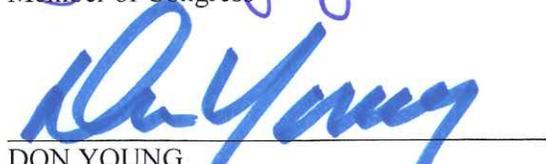
<sup>4</sup> While the per gallon price of ethanol may be lower than gasoline, a gallon of ethanol contains only 70 percent as much energy as a gallon of gasoline. As a result, ethanol is generally more expensive than gasoline on a price per vehicle mile travelled.

  
BEN QUAYLE  
Member of Congress

  
JIM MATHESON  
Member of Congress

  
JOHN CONYERS  
Member of Congress

  
GREGG HARPER  
Member of Congress

  
DON YOUNG  
Member of Congress

  
BILL FLORES  
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TIM WALBERG  
Member of Congress

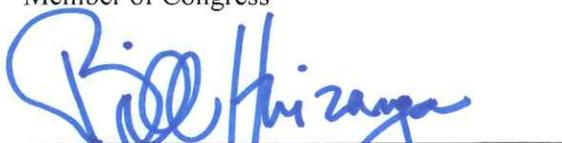
  
JOHN CAMPBELL  
Member of Congress

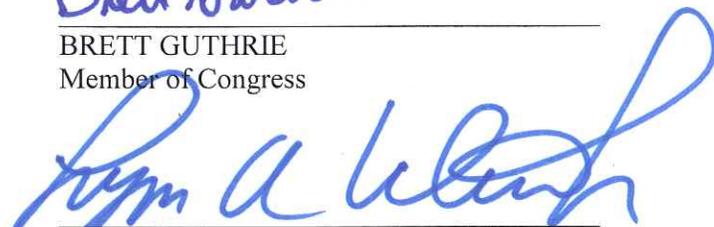
  
CHARLES GONZALEZ  
Member of Congress

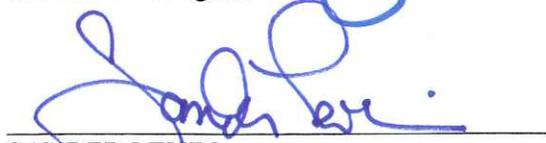
  
JUDY BIGGERT  
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CANDICE MILLER  
Member of Congress

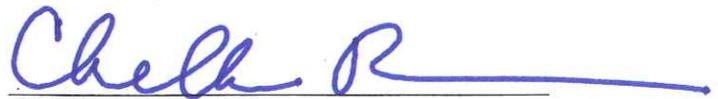
  
TIM GRIFFIN  
Member of Congress

  
RICK CRAWFORD  
Member of Congress



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TOM ROONEY  
Member of Congress



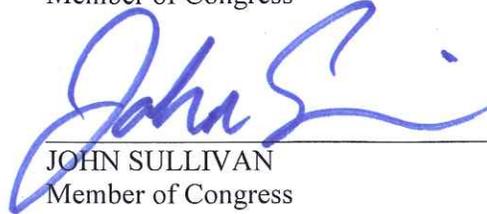
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CHELLIE PINGREE  
Member of Congress



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MIKE MCINTYRE  
Member of Congress



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JOHN SULLIVAN  
Member of Congress



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PAUL BROUN  
Member of Congress



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ALAN NUNNELEE  
Member of Congress



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FRANCISCO CANSECO  
Member of Congress

Enclosure