

October 5, 2018

To: National Conference of Weights and Measures

cc: Northeastern Weights and Measures Association
Southern Weights and Measures Association
Central Weights and Measures Association

RE: Opposition to FLR-8 Section 3.2.5. Prohibition of Terms

As ethanol advocates and with an extensive background in fuel research, we are raising our concern and opposition to the proposal to restrict product terms for gasoline-ethanol blends, specifically FLR-8 Section 3.2.5 Prohibition of Terms submitted by the Petroleum Marketers Association of America (PMAA).

Simply adding ethanol to current gasoline meeting ASTM D4814 has a clear and predictable increase in octane. This increase in measured octane is well documented in multiple studies, including Society of Automotive Engineering paper [2012-01-1277](#).

We are asking that this item submitted by PMAA be immediately withdrawn due to a lack of technical or regulatory justification. The basis for PMAA to submit this item has nothing to do with protecting or informing the consumer but instead, to protect oil industry market share by limiting or obstructing any increase in E15 sales.

When stating E15 is “Unleaded 88”, that means consumers are getting higher octane. Many stations that utilize blender pumps also call E15 “Mid-Grade” since E15 continues to meet 89 AKI requirements. When E15 is made by simply adding ethanol to E10 results in Mid-Grade performance.

If PMAA is truly concerned about properly informing the consumer, maybe it should start by looking in its own back yard. This picture is from a retail station with a major oil company canopy. As per current NIST Handbook 130, four of the five fuel product terms are out of compliance.

Please feel free to contact us if you need further information.



Retail station selling E10 only fuel.

Steve Vander Griend

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