

October 12, 2015

KMoore Consulting LLC Comments to NEWMA L&R New Agenda Item #13

RE: API Form 15 on Section 2.1.2 Modification

1st- I'm Kristy Moore, I am representing myself in my new LLC. Today I'm representing the Illinois Corn Growers Association, and I also provide technical support for several other state corn grower associations.

2nd- In regard to L&R new agenda item #13, I believe the statement in the API Form 15 stating that ongoing issues with E15 may hold up or defeat this ballot is not fully accurate. I would like to provide additional insight into the current status at ASTM on the D4814 volatility ballot. The ASTM D4814 RVP and T50 ballot received 7 negatives once the ballot had closed on September 28th. Six of the negatives identified a multitude of concerns with the ballot including: the lack of impact of the ballot being unclear, additional guidance needed on distillation, grave concerns with impacts to California gasolines, Earth Day concerns, overall concern that the data does not support the proposed changes, and inconsistent treatment of oxygenates. Only one negative voter identified E15 T50 and DI as being handled in a separate ballot- Lew Gibb's own E15 ballot. This modification to Section 2.1.2 is NOT an E15 issue in my opinion.

It is also important to know that the map and states identified as being immediately impacted without an extension may not be accurate. For example, Iowa does adopt NIST Handbook 130, the 2013 version however additional wording in the Iowa code provides an RVP extension to any gasoline blend with more than 9% ethanol.

I recommend this agenda item be referred to FALS as it was FALS who developed the consensus wording that appears today in the Handbook.