

## **L&R Item 2302-7 and L&R Item 2307-2 API Proposed Modifications are Needed**

The modifications proposed by API do not “create the illusion that EPA has labeling requirements for ethanol flex fuel” as some suggest. The modifications simply point out the fact that the EPA requires their labeling for any fuel containing between 10% and 15% volume ethanol. Additionally, the proposed modifications point out the discrepancy between EPA and FTC categorization on E15 fuels and are designed to keep NIST Handbook 130 Sections B and G synchronized.

- Section 2 *Standard Fuel Specifications of the Uniform Engine Fuels and Automotive Lubricants Specifications* Part G of Handbook 130 clearly identifies in 2.1 that Gasoline and Gasoline-Oxygenate Blends “**shall meet the latest version of ASTM D4814.**”
- Gasoline-oxygenate blends containing **up to 15 volume % ethanol have been incorporated into D4814** “Gasoline” specifications. Therefore 15 volume % ethanol blends are covered in 2.1 Gasoline and Gasoline-Oxygenate Blends of Part G.
- Section 2. Standard Fuel Specifications of the Uniform Engine Fuels and Automotive Lubricants Specifications Part G of Handbook 130 clearly identifies in 2.10 that **Ethanol Flex Fuel** is divided into two categories – a. those fuels meeting **ASTM D5798 (51 to 83 vol% ethanol)** and b. those fuel blends meeting **ASTM D7794 (16 to 50 vol% ethanol)**. Therefore 15 vol% ethanol blends are not part of 2.10 Ethanol Flex Fuel but are addressed in 2.1 Gasoline and Gasoline-Oxygenate Blends.
- The original proposals (Item 2307-2 and Item 2302-7) as submitted by Kristy Moore would put Part G, 3.8.2 and Part B 2.30.1 in conflict with Part G 2.1 and Part G 2.10.

Therefore, it is only appropriate to ensure that all of the information is available to the regulator in HB 130 that shows EPA requirements for labeling fuels with 15% volume of ethanol along with those of FTC.