

E15 Retailer Checklist for E15 Commercialization

Revised May 2019

Labels

- The retail dispenser must display a mandatory federal E15 label to prevent introduction of E15 into non-approved vehicles and equipment. Labels must be placed on E15 retail dispensers indicating that E15 use is only for model year 2001 and newer motor vehicles/light duty trucks.

FREE E15 labels are available from RFA by calling 402-661-4764 or Growth Energy at 402-932-0567.



Misfueling Mitigation Plan

Retailers selling E15 are required to comply with a Misfueling Mitigation Plan and participate in a compliance survey which are requirements of the EPA's partial waivers allowing the sale of E15. The Renewable Fuels Association (RFA) has received EPA's approval of its Misfueling Mitigation Plan and Survey Sample Program, which will be conducted by the RFG Survey Association (RFGSA). **Retailers who wish to sell E15 must adopt a Misfueling Mitigation Plan and participate in the Survey Program or potentially be in violation of EPA's regulations.** *The Renewable Fuels Association has both an EPA-approved Misfueling Mitigation Plan and Survey Program that are available for retailers' use in meeting these EPA requirements.*

Since the Survey Program costs are being paid by the ethanol industry, retailers with blender pumps will only pay a nominal fee of \$100 per site per year.

Retailers purchasing blended E15 are exempt from paying the survey fee, however, they must participate in the Survey Program Plan.

The RFG Survey Association offers online registration and payment. To register go to: www.rfgsa.org. Questions may be directed to Frank Lenski with the Survey Association at PH: 703-279-6434 or email: frank.lenski@rfgsa.org.

Product Transfer Document (PTD) Requirements

The EPA requires that PTDs, (e.g. bill of lading) disclose any volume of ethanol greater than 10 volume percent up to 15 volume percent. EPA is also requiring that PTDs include more pertinent information to help ensure that fuel producers, distributors and retailers have the information they need to properly blend, track and label E15. ***Retailers should be sure their fuel supplier is meeting this requirement.***

PTD's should include the following information:

- ✓ Name and address of the transferor
- ✓ Name and address of the transferee
- ✓ Volume of conventional blendstock for oxygenate blending or gasoline being transferred
- ✓ Location of the conventional blendstock for oxygenate blending or gasoline at the time of the transfer
- ✓ Date of transfer
- ✓ Maximum RVP

Document Submission

- **Misfueling Mitigation Plans:**

Any company that wishes to use the Renewable Fuels Association's Misfueling Mitigation Plan (MMP) and Survey Program Plan must notify EPA in writing that the company seeks approval of the March 2, 2012 Model Plan and the EPA-approved Survey Program Plan for the company's use in meeting the waiver requirements for a MMP. Companies need to send EPA a letter containing the following:

- 1) reference participation in the March 2, 2012 Model Plan posted on EPA's website at <https://iowarfa.org/wp-content/uploads/2014/12/RFAModelE15MisfuelingMitigationPlan.pdf> and the Survey Program outlined in the Misfueling Mitigation Plan.
- 2) the nature of the company's planned E15-related business (e.g. oxygenate blender, retailer)
- 3) how E15 will be dispensed, i.e. dedicated hose or same hose and nozzle as E10/E0
- 4) the mandatory EPA E15 label will be placed on pumps dispensing E15
- 5) suppliers will adhere to the Product Transfer Document requirements for E15 fuel
- 6) provide consumer education as part of the E15 Outreach Coalition.

The letter should be on company letterhead, signed by a company official and both mailed (hard copy) and emailed to the EPA. Hard copies should be mailed to:

Director, Compliance Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (Mail Code: 6405J)
Washington, DC 20460

The letter should be emailed to Robert Anderson at:

anderson.robert@epa.gov

- ✓ ***Retailers will receive written approval from the EPA of their registration to sell E15. Once an approval letter is received, registration for the Survey Program is completed and payment for the Survey program is submitted, a retailer may legally sell E15 as a registered fuel for 2001 and newer vehicles.***

Sources: Renewable Fuels Association, Growth Energy and U.S. EPA

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