



April 28, 2022

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Regan,

We are writing to thank you and the U.S. Environmental Protection Agency (EPA) for exercising your emergency waiver authority to waive the 9-psi Reid vapor pressure (RVP) limitation for gasoline blended with 15 percent ethanol (E15) for the 2022 summer ozone control season. This action will help provide relief, flexibility, and certainty in the fuel market as we are seeing record high gasoline prices in our states and around the country.

While this emergency RVP waiver will deliver economic relief and energy security benefits in the near term, a permanent solution allowing the year-round sale of E15 is also needed for long-term certainty. Accordingly, we are notifying the EPA, pursuant to Section 211(h)(5) of the Clean Air Act, that the RVP limitation established by Section 211(h)(4) increases emissions that contribute to air pollution in our states. Therefore, we respectfully request that EPA promulgate a regulation applying, in lieu of the RVP limitation established by Section 211(h)(4), the RVP limitation established by Section 211(h)(1) to all fuel blends containing gasoline and 10 percent ethanol that are sold, offered for sale, dispensed, supplied, offered for supply, transported, or introduced into commerce in Iowa, Nebraska, Illinois, Kansas, Minnesota, North Dakota, South Dakota, and Wisconsin beginning with the 2023 summer ozone control season.

According to a Health Effects Institute Panel on the Health Effects of Traffic-Related Air Pollution, “High gasoline vapor pressure causes high evaporative emissions from motor vehicles and is therefore a priority fuel quality issue. ... Reductions in fuel volatility will significantly reduce evaporative emissions from vehicles. A reduction in vapor pressure is one of the more cost effective of the fuel-related approaches available to reduce hydrocarbon emissions.”¹

The emissions benefits of lowering gasoline vapor pressure by 1-psi were modeled for each of our states (see attachment). The analysis concluded that a 1-psi RVP reduction would be beneficial to air quality, as emissions of carbon monoxide (CO), oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) would be reduced.

¹ Health Effects Institute. HEI Panel on the Health Effects of Traffic-Related Air Pollution. (2010) “Special Report 17: Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects.”

Supporting documentation for this request is attached. We urge swift action to help lower fuel prices across the country, restore energy independence, and increase consumer access to our nation's homegrown biofuels. We appreciate your consideration of our request.

Sincerely,




Kim Reynolds
Governor of Iowa



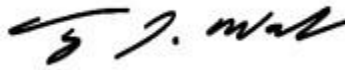
Pete Ricketts
Governor of Nebraska



JB Pritzker
Governor of Illinois



Laura Kelly
Governor of Kansas



Tim Walz
Governor of Minnesota



Doug Burgum
Governor of North Dakota



Kristi Noem
Governor of South Dakota



Tony Evers
Governor of Wisconsin

Emissions Impacts of the Elimination of the 1-psi RVP Waiver for E10 in Eight States

April 15, 2022

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Ecoengineering, Inc.

The U.S. EPA Motor Vehicle Emissions Simulator (MOVES) Version 3.0.3 model has been used to estimate the impact on air emissions from both onroad and nonroad vehicles if the 1-psi Reid vapor pressure (RVP) waiver for 10% ethanol blends were to be eliminated. The model was run for a single July weekday in 2023 in each of 8 states. A summer day was chosen because the RVP limit of 10 psi for E10 fuels (9 psi for gasoline) is only applicable in the summer ozone season.

MOVES3 is a complex emission modeling system intended to estimate air pollution emissions from mobile sources in the United States. It is based on many individual physical processes, which are then scaled up on the basis of fleet-average emission factors, and a database which includes information on the use-rates of different types of vehicles and the properties of the fuel used in each region of the country.

For this work MOVES3 default values for all local data were used, including things like meteorology, source-type populations, age distributions, vehicle type VMT, etc. , with the exception of the fuels data. The default fuels data were used for the base runs, and then all 10 psi E10 fuels in the database were adjusted to 9 psi using the “Fuels Wizard” tool in MOVES3. When the user adjusts a specific fuel characteristic such as, in this case, RVP, the Fuels Wizard adjusts other fuel properties based on EPA’s refinery modeling.

The eight states evaluated were

1. Iowa,
2. Nebraska,
3. Kansas,
4. Wisconsin,
5. South Dakota,
6. Minnesota,
7. North Dakota, and
8. Illinois

The MOVES model showed that emissions of VOCs, NO_x, CO would be reduced in each one of these states by lowering the vapor pressure of summer E10 to 9 psi.

Table 1. Reduction in Emissions of CO, NO_x and VOCs from all onroad and nonroad MOVES3.0.1 sources for a July weekday in 2023.

	CO	NO _x	VOCs
Iowa	-0.4%	-0.1%	-1.8%
Kansas	-0.4%	-0.1%	-2.0%
Minnesota	-0.5%	-0.1%	-2.7%
Nebraska	-0.5%	-0.1%	-2.6%
North Dakota	-0.3%	0.0%	-2.2%
South Dakota	-0.5%	-0.1%	-2.9%
Wisconsin	-0.4%	-0.1%	-1.7%
Illinois	-0.2%	-0.2%	-0.9%