



August 10, 2016

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator McCarthy:

The American Motorcyclist Association seeks clarification on the U.S. Environmental Protection Agency's Misfueling Mitigation Program. Specifically, our concerns are with a possible minimum fuel purchase at a blender pump that dispenses multiple fuel grades—including E15 (15 percent ethanol)—from the same hose.

Founded in 1924, the AMA is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

In 2012, the AMA sent a letter (enclosed) to the EPA raising our concerns with the Misfueling Mitigation Program, as it relates to motorcycles and all-terrain vehicles. We requested specific recommendations to address the AMA's concerns. In an Aug. 21, 2012 letter (enclosed), the EPA responded with a plan to recommend, in part, that "...at least four gallons of fuel be purchased to prevent vehicles and engines with smaller fuel tanks from being exposed to gasoline-ethanol blended fuels containing greater than 10 vol% ethanol."

The AMA objected to this recommendation. The average fuel tank size for motorcycles is less than 4 gallons. Therefore, motorcyclists would be unable to purchase the required minimum purchase of 4 gallons. The EPA informed the AMA on Dec. 17, 2012, that it reversed its decision to require the minimum purchase.

However, the American Coalition for Ethanol's *E15 & Flex Fuel Retailer Roadmap, 2016-2017 edition*, cites the EPA (Page 80) as approving three hose configurations to address "E15 Hose Configuration/Labeling" issues.¹

According to option No. 2 in ACE's roadmap:

2. E15 can be sold on the same hose with gasoline (E0 to E10) using this configuration:
Require a minimum purchase of four gallons and apply a label stating "Minimum Fueling Volume 4 Gallons. Dispensing Less May Violate Federal Law." (Emphasis added).

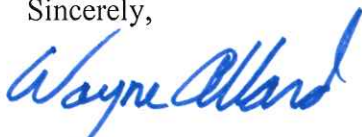
¹ <https://ethanol.org/assets/images/media/35/9-35.Ethanol%20Retailer%20Roadmap.pdf>, accessed on Aug. 10, 2016.

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On behalf of the millions of motorcyclists and ATV owners in the United States, we ask: Has the EPA's Misfueling Mitigation Program been revived or amended since the agency informed the AMA in 2012 that no minimum fuel purchase would be required?

Thank you for your time and consideration of our concerns. If you have questions about this request, please do not hesitate to contact me by phone, (202) 220-1390, or by email, wallard@ama-cycle.org.

Sincerely,



Wayne Allard
Vice President, Government Relations

Enclosures