



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 (NOx) 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



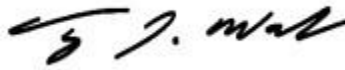
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