

April 17, 2021

U.S. Environmental Protection Agency  
EPA Docket Center, Air Docket, Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Via: <https://www.regulations.gov>

**Re: Docket I.D. No. EPA-HQ-OAR-2020-0448: E15 Fuel Dispenser Labeling and Compatibility With Underground Storage Tanks**

To Whom it May Concern:

The Specialty Equipment Market Association (SEMA) welcomes the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) proposed rule to either modify or remove the E15 label requirement. SEMA opposes this proposed rulemaking and urges the EPA to expand the current warning label. Ethanol can cause damage to vehicles manufactured prior to 2001 and certain specialty high-performance equipment installed on newer vehicles. In order to prevent misfueling, E15 labels must provide an adequate warning to consumers about the damage E15 can cause to certain vehicles and engines.

SEMA represents the \$46 billion specialty automotive industry comprised of 7,500 mostly small businesses nationwide that manufacture, retail, and distribute custom parts and accessories for motor vehicles. The industry produces performance, restoration, and enhancement parts for use on passenger cars and trucks, collector vehicles, racecars, and off-highway vehicles. Products range from wheels and tires to engines, exhaust systems, lighting equipment, suspensions, truck caps, leather seating, mobile electronics, and more.

SEMA's comments focus on the proposed modifications or removal of the E15 label requirement. Ethanol, especially in higher concentrations such as E15, can cause metal corrosion and dissolve certain plastics and rubbers in older automobiles that were not constructed with ethanol-resistant materials. In 2011, the EPA made it illegal to use E15 fuel in motor vehicles made before 2001, along with motorcycles, boats and gasoline-powered equipment.

EPA's decision to limit E15 sales to model year 2001 and newer vehicles acknowledged the risks that higher blends of ethanol pose to older vehicles. However, SEMA has always contended that the current E15 warning label is insufficient to alert the consumer about accidental misfueling. The proposed modifications to the E15 label move in the wrong direction and would increase the likelihood of consumers using E15 in incompatible vehicles at a time when the number of gas stations offering E15 is expanding.

SEMA also opposes the removal of the E15 label entirely. While, as noted in the proposed rule, removing the E15 label does not remove the prohibition on the use of E15 in MY2000 and older light duty vehicles, such removal places the responsibility to know if their vehicle is compatible

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solely on the consumer which will lead to much more misfuelling. Further, the EPA acknowledges that misfuelling could result in increases in hydrocarbon, carbon monoxide, nitrous oxide, particulate matter, and air toxic emissions. Given that the EPA estimates there are still millions of older vehicles and non-road vehicles for which E15 poses a risk, removing the E15 label should not be an option.

In fact, SEMA contends that the current label does not do enough to protect consumers, and the label should be expanded, not limited or removed. SEMA has supported federal legislation to strengthen the warning label in the past. SEMA recommends expanding the label to include the words "WARNING" and "Check your owner's manual"; be 5x7 inches or larger; and include pictograms depicting a boat, a lawnmower, a chainsaw, a motorcycle and a snowmobile.

SEMA also recommends that the EPA take this opportunity to establish a uniform national labeling standard for gasoline that contains 10% ethanol or less. The labels are currently subject to state law and some states do not require that consumers be informed that the gasoline being purchased contains ethanol. For example, it is estimated that fewer than 25 gas stations in California sell pure gas.

The collection, restoration, and preservation of automobiles is an activity shared across generations. The proposed rule to modify or remove the E15 label puts vintage, classic, and specialty vehicles at risk. For the reasons provided above, SEMA respectfully opposes the proposed rule to limit or remove the E15 label. Thank you for this opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Daniel Ingber', with a long horizontal flourish extending to the right.

Daniel Ingber  
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