



April 19, 2021

The Honorable Michael Regan  
Administrator  
Environmental Protection Agency

RE: Docket ID EPA-HQ-OAR-2020-0448

Dear Administrator Regan:

Thank you for the opportunity to comment on the Environmental Protection Agency's (EPA) request for comment on a proposal to modify the fuel dispenser label for 15 percent ethanol blended fuel (E15) and grant additional allowances for compatibility demonstration for underground storage tank systems (USTs). The Michigan Corn Growers Association (MCGA) represents more than 1,400 dues-paying members as well as the interests of Michigan's more than 14,000 corn farmers.

As producers of the primary feedstock for ethanol, Michigan's corn growers support expanding availability of higher ethanol blends. Here in Michigan, ethanol is the largest market for our corn. MCGA supports modifications to EPA's E15 label and the proposed UST compatibility allowances for secondary containment and already compatible tanks and piping. MCGA also supports the proposed compatibility requirements for new and replacement equipment as a cost-effective means to ensure retailers can more easily bring future fuels to the marketplace without compatibility barriers or need for new investments. We urge you to reference comments submitted by the National Corn Growers Association for additional technical details.

Updating EPA's label and supporting compliance demonstration for USTs will benefit both consumers and retailers. Due to fleet turnover since EPA approved E15 for 2001 and newer vehicles, the vast majority of light duty vehicles on the road today are approved to use E15. Labeling should inform consumers that E15 is safe for use in their vehicles.

Through the National Corn Growers Association and our state corn grower associations, farmers have made significant financial investments to support biofuels infrastructure compatible with higher ethanol blends such as E15. Farmers' investments have supported retailers in determining equipment compatibility with higher blends and supported greater availability and installation of equipment compatible with higher blends and future fuels. We urge EPA to expand the allowances for already compatible equipment to do more to make compatibility demonstration less burdensome for retailers.

Increasing access to E15 will give consumers more choices at the pump and help decrease greenhouse gas emissions from our vehicle fleet using existing infrastructure. We urge EPA to move forward with removing these unnecessary barriers for retailers.

Sincerely,  
Jim Zook  
Executive Director  
Michigan Corn Growers Association