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Michael L. Parson

GOVERNOR
STATE OF MISSOURI

December 21, 2022

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

Dear Administrator Regan,

We appreciated the U.S. Environmental Protection Agency's use of its emergency waiver authority to allow uninterrupted sales of gasoline blended with 15 percent ethanol (E15) during the 2022 summer ozone control season. Allowing E15 sales to continue this past summer helped extend tight fuel supplies and provided Missouri drivers with lower-priced options at the pump during a period of record high fuel prices and turmoil in the world energy market.

However, it is clear that relying on emergency waivers for year-round sales of E15 is not a long-term solution for Missouri's fuel retailers, farmers and ethanol producers, consumers, or the environment. Thus, I am joining other Midwest states in seeking a permanent solution to allow year-round E15 and further reduce emissions.¹

With this letter I am notifying EPA that, pursuant to Section 211(h)(5) of the Clean Air Act, the Reid vapor pressure (RVP) limitation established by Section 211(h)(4) increases emissions that contribute to air pollution in our state. Therefore, I 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 Missouri 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."²

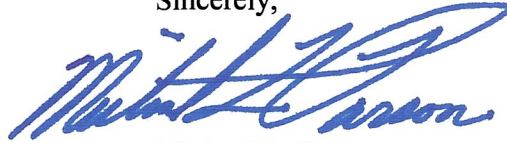
¹ Letter to Michael Regan, Administrator, U.S. Environmental Protection Agency, from Govs. Kim Reynolds (Iowa), Pete Ricketts (Nebraska), JB Pritzker (Illinois), Laura Kelly (Kansas), Tim Walz (Minnesota), Doug Burgum (North Dakota), Kristi Noem (South Dakota), and Tony Evers (Wisconsin). April 28, 2022. See also letter to Michael Regan, Administrator, U.S. Environmental Protection Agency, from Gov. Mike DeWine (Ohio). June 10, 2022.

² 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."

The emissions benefits of lowering gasoline vapor pressure by 1-pound per square inch (psi) were modeled for the state of Missouri (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.

Supporting documentation for this request is attached. If you have any questions, please contact Jamie Birch at Jamie.birch@governor.mo.gov or (573) 751-2937.

Sincerely,



Michael L. Parson
Missouri Governor

Attachment