

## Position on Ethanol Mandate (E15) in Gasoline Motor Fuels

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### **Position**

The United States Power Squadrons (USPS) opposes the 50% increase in the amount of Ethanol in gasoline sold as motor fuel. USPS opposes increasing the EPA Ethanol mandate standard from E-10 to E-15. USPS urges the EPA to fully understand the harmful effects of increased concentrations of Ethanol in marine fuels before mandating their use. USPS supports regulations that encourage use of environmentally sound fuels and accommodates a vital and strong renewable fuels industry only if those regulations do not impair the marine industry or increase the risk of harm to the boating public.

### **Background**

As the largest recreational boating safety and education organization in the country, USPS is very concerned about the safe and effective operation of recreational vessels. From its over 100 years of promoting safety and improving the recreational boaters experience, USPS has a unique perspective, having observed first-hand the transition from various methods of propulsion of its member's boats. For example, the introduction of E-10 created many documented safety problems for marine engines. Every transition has the potential to be very detrimental to the recreational boater if not properly managed.

Gasoline engines used in marine applications carry with them unique considerations for safe and effective operation: Fuel storage occurs over substantial periods of time, boats (and their fuel supplies) are in a wet, humid and often salt laden environment, and seasonality in much of the nation dictates extended off season storage. In addition, due to the configuration of most gas powered boats, the engines are operated at higher RPM and temperature, significantly more frequently. These combined circumstances are not present for other gasoline users.

### **More Analysis is Needed to Avoid Harm.**

Recognizing the unique circumstances, boat and engine manufacturers have attempted to accommodate alcohol concentrations in marine fuels, thus far with limited success and only with respect to the current E-10 concentration. Universally marine manufacturers reject the use of greater concentrations of alcohol. Each of the unique circumstances of boat fueling are exacerbated by increasing the alcohol in gas.

Engine and fuels manufacturers are evaluating the full effects of increased alcohol in fuels and developing new products that can prospectively handle the changed fuels; however no similar remedy is available for the millions of boats and boaters who have billions of dollars invested in existing vessels which will last well into the next decade and beyond. Absent assurance that increased concentrations of Ethanol can be properly managed the Renewable Fuels Standard should not be allowed to increase. This will assure that the risk of property damage to marine users and accompanying increased safety risks do not overshadow the potential environmental benefits.

The current E-10 standard represents a phase-in of the addition of alcohol into marine fuel. The alcohol concentration in fuels must not be increased in order to allow current marine users to transition to this fuel. Alternative approaches are preferred to obtain the necessary reduction in emissions. The introduction of E-10 into marine gasoline engines caused significant harm with consequential safety implications. E-15 should not be mandated for use (directly or indirectly) in marine gasoline engines without explicit consideration of realistic alternatives.