

# “2-Year Timeout” A Win-Win Solution

## Removing Regulatory Barriers for Higher Ethanol Blends

### Permanent RVP Relief for All Biofuel Blends >E10

The Environmental Protection Agency (EPA) should extend the existing Reid Vapor Pressure (RVP) waiver for E10 to all biofuel blends allowing consumers year-round access to higher ethanol blends nationwide and increasing the number of RINs generated from blending larger volumes of cleaner-burning, American-made biofuels.

### Improve Fuel Dispenser Labeling

The EPA’s current labeling requirements for E15 Misfueling Mitigation Plans cast ethanol in a negative light, and should be modified to stop unnecessarily scaring consumers who choose to use E15 in approved vehicles – including cars made after 2001, or 90% of cars on the road today.

### Eliminate the Fuel Sampling Plan for E15

The fuel sampling plan imposed on stations selling E15 as part of the Misfueling Mitigation Plan is costly, onerous and unnecessary. As an EPA-approved fuel, E15 deserves the same treatment as E10, which is exempt from this requirement.

### Implement a Federal Minimum Octane Standard

A federal minimum octane standard of 91 AKI would drive automakers to design more efficient engines, substantially reducing GHG emissions while helping U.S. autos conform to more stringent Corporate Average Fuel Economy (CAFE) requirements in future years.

### Restore Incentives for Flex-Fuel Vehicles

EPA should update R-Factor calculations and provide long-term F-Factor guidance to automakers. These simple administrative actions would remove regulatory uncertainty and restore reliable CAFE compliance value to automakers for flex-fuel vehicles.

## Reducing Compliance Costs by Growing the Supply of RINs

### 2-Year Program Lowers Costs by Multiplying RINs

Merchant refiners claim that RFS compliance is too costly. A temporary two-year program could be designed to immediately multiply the number of D6 RINs, reducing compliance costs while encouraging the use of higher biofuel blends. The renewable volume obligation for conventional biofuels would remain unchanged at 15 BG, upholding the goal of the RFS.

### Introduces New RIN Multiplier for >E10 Ethanol Blends

Each gallon of ethanol blended into gasoline >10% would receive a RIN multiplier. The current ethanol adoption rate for volumes >10% is estimated at 500 MGPY. For example, a (x1.3) per gallon multiplier could generate an estimated 150 million additional RINs annually, totaling 650 million D6 RINs.

### Utilizes Existing EPA Structures

The multiplier concept is currently utilized for biodiesel (x1.5) and renewable diesel (x1.7) RINs. A temporary program could be designed and administered similar to the EPA’s Quality Assurance Plan. The program would introduce no new RIN generators or obligated parties, and only blenders of >10% ethanol would qualify.