



Margaret Bonds Podlich
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Written Testimony submitted by

Margaret Podlich, President, BoatU.S.

Regarding the Hearing entitled:

Up Against the Blend Wall: Examining EPA's Role in the Renewable Fuel Standard

June 5, 2013

2154 Rayburn House Office Building

June 4, 2013

Chairman Lankford, and Members of the Subcommittee,

On behalf of over half a million members of BoatU.S. (Boat Owners Association of the United States), I am submitting written comment to express my serious concerns with the impact that the Renewable Fuel Standard (RFS) has had, and will have, on boaters through the mandated use of higher blends of ethanol in our nation's gasoline supply.

Although the original expressed intent of the RFS was to utilize a suite of different renewable fuels, only corn-based ethanol has had the infrastructure to produce the volume required to meet the mandated consumption. Over 87% of the 2012 mandated 15.2 billion gallons was met with the use of ethanol. Although ethanol blended gasoline at the 10% level has proven to be a good oxygenate and acceptable fuel for automobiles, it has been a painful transition for marine engines.

While most BoatU.S. members believe strongly in energy independence and the importance of renewable fuels in our nation's fuel sourcing we have many members who have had significant engine malfunction. However, it is the chemistry of ethanol in particular that has plagued marine engines. Because ethanol is prone to binding to water molecules, it separates from the gasoline and sinks to the bottom of marine fuel tanks where the intake lines are generally located. With engines that don't get used everyday, and a fuel that attracts water, phase separation has been a reoccurring theme, resulting in an array of problems and engines that aren't reliable.

BoatU.S. has the nation's largest marine towing fleet for recreational boats that operates 600 towboats in 300 ports on a 24/7 schedule. Recently we asked our towers to share some of their experiences with ethanol gas at the 10% level. Here are a couple of their responses:

"I would venture to say that maybe 20% of my tows are a result of ethanol fuel problems. Of the 20% of the ethanol tows probably 25% are urgent because the vessel is drifting out to sea or in peril with drifting hard aground."

Dave Hoblin, **TowBoatU.S.** Old Saybrook, Clinton and Old Lyme, CT

"I had a customer that called thru BoatU.S. Dispatch with reported engine failure. When I got to the disabled vessel, we cranked the engine but it won't start. It appeared to be starving for fuel. I then pulled the fuel/water separator and poured the contents into a glass jar I always carry. It was clearly a case of Phase Separation with the ethanol/water on the bottom and the remaining fuel on top. I then towed the customer back to his Home Port and advised him to have his fuel tank pumped out. I've seen this many times over the past couple of years. In this case the customer broke down in the middle of the shipping channel."

Capt. Rich Busillo, **TowBoatU.S.** Delaware River Tow LLC, Philadelphia, PA

The boater's concerns are exponentially magnified with the possibility of 15% ethanol fuel (E15) blends, currently being implemented as a solution to the impending "blend wall."

- Current marine engines are not built to run on more than 10% ethanol. **There is not a single marine engine warranty that covers the use of gasoline containing more than 10% ethanol.** The failure of an automobile engine, although possibly dangerous, cannot compare to that of being stuck, alone at sea, or running through an inlet or channel and suddenly losing all power. This fuel issue could quickly become a matter of human safety.
- **In a 2010 study conducted by the National Renewable Fuel Laboratory and the U.S. Department of Energy, four new marine engines were tested on E15 and E-free gasoline.** These engines ranged from a \$24,000 300HP to a \$2600 9.9HP and included both inboard and outboard engines. **All four engines operated incorrectly in some way on E15.** Three of the engines suffered degraded emission results so that over the life of the engine, they would not meet California or Federal emission standards. Two of the engines had severe mechanical damage and one could not complete the test due to multiple valve failure.
- While some marinas are able to get ethanol-free fuel, many recreational boaters fill up their boats at roadside gas stations where the fuel is cheaper. In a poll of our members, over 58 percent fill up at a roadside gas station. Although EPA has prohibited the use of higher blends in boats, at the gas station different blends will dispense from the same hose, creating a distinct possibility at every fueling of putting the wrong fuel into a boat or a truck. **As higher blends of ethanol fuel come into the local gas station, we expect boat owners will start unknowingly misfueling their trailer boats, and potentially their legacy tow vehicles as well.**

We strongly believe that the EPA has a responsibility to ensure that the fuels in the marketplace – those now mandated through the RFS - are safe for the consumer and will not damage vital consumer goods. In fact, this concept is reiterated in the first part of the EPA Mission statement:

“EPA's purpose is to ensure that:

all Americans are protected from significant risks to human health and the environment where they live, learn and work....

In a letter written to EPA Administrator Lisa Jackson in August 2012, twenty-five U.S. Senators reminded the EPA that the Energy Independence and Security Act (EISA) which included the RFS, purposely contained “safety valves” that enabled the agency to adjust the RFS. These “safety valves” or waivers have already been used by the EPA in 2011 and 2012 to reduce RFS mandate levels on cellulosic biofuels - by 97%! Clearly EPA has a tool to use to adjust the RFS when real world factors indicate a need for it.

In the long term we ask the EPA to reevaluate the practicality of the RFS mandates while gasoline usage drops nationwide, and there is less fuel to blend with ethanol.

Today we ask that the EPA use their “safety valve” or waiver authority to fulfill their responsibility to the United States citizen and consumer, by reducing the RFS mandate of 13.8 billion gallons of ethanol for 2013. Reducing the mandate will prevent the artificial stimulation and promotion of 15% ethanol fuel – a fuel that is poison to all existing boat engines.

Thank you for allowing BoatU.S. the opportunity to weigh in on such an important issue. I have attached both the NREL Study and the U.S. Coast Guard Report to Congress which support the statistics illustrated in these comments. Please do not hesitate to contact me at mpodlich@boat.us or 703-461-2878 ext. 3201 if I can provide further comment or background material.

National Renewable Energy Laboratory Study - High Ethanol Fuel Endurance:
A Study of the Effects of Running Gasoline with 15% Ethanol Concentration in Current Production Outboard Four-Stroke Engines and Conventional Two-Stroke Outboard Marine Engines - June 16, 2010 – June 30, 2011
David Hilbert

U.S. Coast Guard Report to Congress: Survey of Published Data and Reports on Blended Fuels in Marine Applications, January 12, 2012.
<http://www.nmma.org/assets/cabinets/Cabinet213/USCGSurveyReportonBlendedFuels.pdf>