

September 28, 2010

The Honorable Gina McCarthy  
Assistant Administrator for Air and Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

**Re: Joint Opposition to Approval of "E12" Without Comprehensive New Engine, Emissions and Safety Testing**

Dear Assistant Administrator McCarthy:

The undersigned organizations strongly oppose recent requests by ethanol manufacturers that the Environmental Protection Agency (EPA) approve a new and untested mid-level ethanol blend ("E12," or gasoline blended with 12 percent ethanol) for all gasoline engines.

There has been no opportunity to review the data submitted in support of an E12 authorization, no public comment period or peer review of the data purported to support this request, and no specific testing conducted by independent experts that supports the data submitted. We collectively agree that EPA must move cautiously to prevent the introduction of new mid-level ethanol blends that may impact engine durability, increase emissions, be incompatible with existing on- and non-road vehicles and engines, and decrease consumer safety.

Our organizations continue to oppose the introduction of E15 into commerce without comprehensive and independent testing. EPA approval of E12, without the same rigorous and extensive independent testing and without the opportunity for public comment and critique of the data submitted to support E12 would be misguided and would sidestep the new fuels and additives protections enacted by Congress and embodied in Section 211(f)(4) of the Clean Air Act.

Sincerely yours,

American Meat Institute  
American Petroleum Institute  
Association of International Automobile Manufacturers  
Engine Manufacturers Association  
Grocery Manufacturers Association  
International Liquid Terminals Association  
International Snowmobile Manufacturers Association  
Motorcycle Industry Council  
National Chicken Council  
National Consumers League  
National Council of Chain Restaurants  
National Marine Manufacturers Association  
National Meat Association  
National Petrochemical & Refiners Association  
National Turkey Federation  
NATSO – National Association of Truck Stop Operators

Natural Resources Defense Council  
Outdoor Power Equipment Institute  
Recreational Off-Highway Vehicle Association  
Small Business & Entrepreneurship Council  
Snack Food Association  
Specialty Equipment Market Association  
Specialty Vehicle Institute of America

cc: The Honorable Barbara Boxer  
The Honorable Jim Inhofe  
The Honorable Henry Waxman  
The Honorable Joe Barton