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GrowthEnergy.org

February 7, 2020

Mr. Doug Killingsworth  
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Via email: [William.Killingsworth@agr.georgia.gov](mailto:William.Killingsworth@agr.georgia.gov)

Director Killingsworth,

Growth Energy is the world's largest association of biofuel producers, representing 103 U.S. plants that each year produce more than 8.6 billion gallons of cleaner-burning, renewable fuel; 95 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we remain committed to bring better and more affordable choices at the fuel pump to consumers, help our country diversify our energy portfolio in order to grow more energy jobs, sustain family farms, and drive down the costs of transportation fuels for consumers.

Growth Energy supports the proposed changes to the state of Georgia's Rule 40-20-1-.01 entitled "Standards for Petroleum Products." We appreciate the effort to keep Georgia's gasoline requirements up to date with ASTM International and the regulations of the United States Environmental Protection Agency (EPA), as well as industry practices. Understanding this proposal focuses on the recent vapor pressure changes made by EPA, we feel this is also a prime opportunity to update the regulation by including 15% ethanol fuel blends. There are retailers making significant investments in Georgia to offer a cheaper, cleaner fuel to Georgians; the Department can take steps to support these local investments by including legally approved fuels. At the end of this letter, please find a few additional modifications for your consideration.

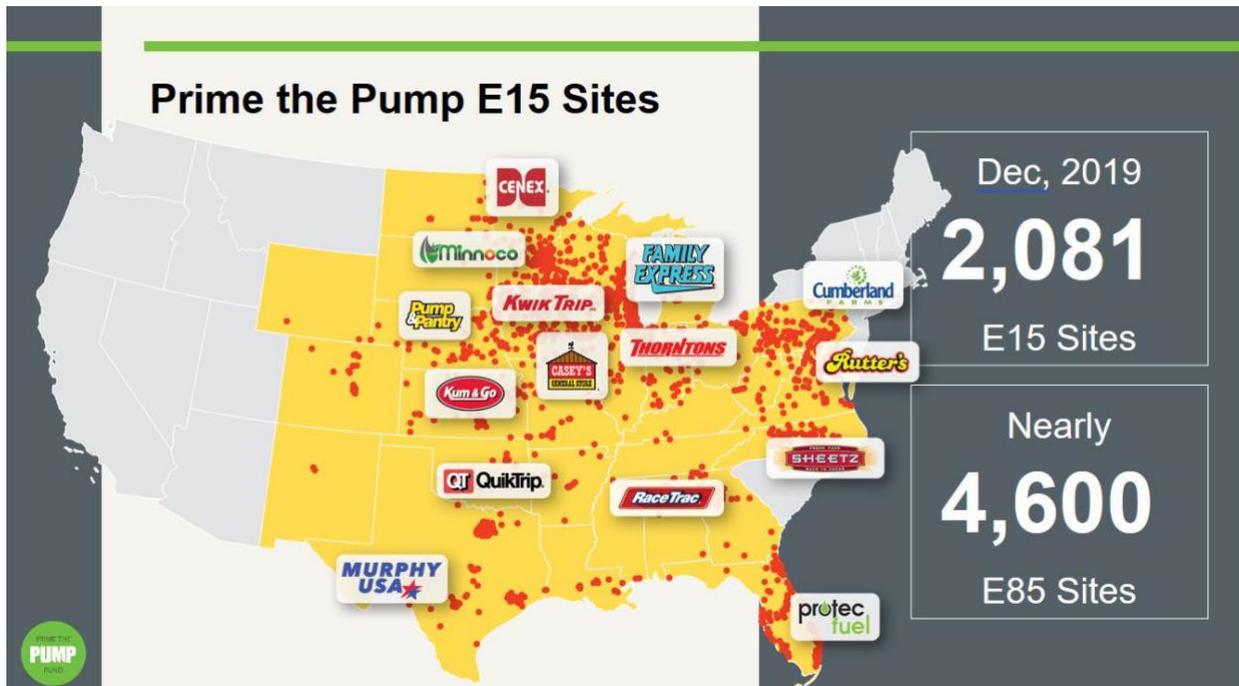
Today, 98 percent of all gasoline sold in the U.S. contains 10 percent ethanol, and E15 is now available at more than 2,000 retail locations in 30 states. Consumers have now driven more than 12 billion miles on E15 and retailers have conducted millions of transactions with this fuel. There have been no adverse reports of fuel quality experienced with E15 since first being approved 9 years ago.

Growth Energy appreciates the opportunity to comment in support of the fuel regulation modification for the state of Georgia. We are available to discuss these modifications at your convenience and would welcome an opportunity to update you on our efforts to advance ethanol blends.

Respectfully,

Chris Bliley  
**Senior Vice President, Regulatory Affairs**  
**Growth Energy**

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Growth Energy Additional Proposed Modifications:

Georgia's Standards for Petroleum Products (Rule 40-20-1-.01).	Growth Energy Proposed Modifications (highlighted in yellow and strikeout):
Oxygenated gasoline:	Oxygenated gasoline:
(b)1. Oxygenated motor fuels shall must meet all applicable requirements	(b)1. Oxygenated motor fuels shall must meet all applicable requirements for

for automotive gasoline established in the preceding sections. However, an oxygenate blend consisting of 90% gasoline and 10% denatured ethanol, where the ethanol (only) content is 9-10% by volume (3.1 - 3.7 mass % oxygen as ethanol), may have the following volatility requirements for the T50 minimum distillation temperature, vapor/liquid ratio and vapor pressure:

...

(ii) V/L 20 minimum temperature of 120°F for volatility classes AA-2 and A-2 class A-2, 113°F for volatility classes AA-3, A-3 and C-3, and 107°F for volatility class D-4 in (a)5 (a)4.

4. The finished product shall must meet all specifications for spark ignition engine fuels, except for enforcement purpose, the vapor pressure may be 1 psi higher than the values in (a)5 a(4). if the ethanol (only) content is 9-10% by volume (3.1 - 3.7 mass % oxygen as ethanol). It is recommended that 10 volume % ethanol blends with RBOB meet vapor pressure requirements.

automotive gasoline established in the preceding sections. However, an oxygenate blend consisting of 90 85% gasoline and 10 15% denatured ethanol, where the ethanol (only) content is 9-10% by volume (3.1 - 3.7 5.5 mass % oxygen as ethanol), may have the following volatility requirements for the T50 minimum distillation temperature, vapor/liquid ratio and vapor pressure:

...

(ii) V/L 20 minimum temperature of 120°F for volatility classes AA-2 and A-2 class A-2, 113°F for volatility classes AA-3, A-3 and C-3, and 107°F for volatility class D-4 in (a)5 (a)4.

4. The finished product shall must meet all specifications for spark ignition engine fuels, except for enforcement purpose, the vapor pressure may be 1 psi higher than the values in (a)5 a(4). if the ethanol (only) content is 9- 10 15% by volume (3.1 - 3.7 5.5 mass % oxygen as ethanol). It is recommended that 9- 10 15 volume % ethanol blends with RBOB meet vapor pressure requirements.