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GrowthEnergy.org

October 21, 2021

Kristina Box, MD
Commissioner
Indiana Department of Health
2 Meridian Street
Indianapolis, IN 46204

Dear Commissioner Box,

Growth Energy is the world's largest association of biofuel producers, representing 92 U.S. plants that each year produce more than 7 billion gallons of cleaner-burning, renewable fuel – including eight of Indiana's fifteen biorefineries. We also represent 91 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we remain committed to bringing better and more affordable choices at the fuel pump to consumers, helping our country diversify our energy portfolio in order to grow more energy jobs, sustaining family farms, and driving down the costs of transportation fuels for consumers.

Today, 98 percent of all gasoline sold in the U.S. contains 10 percent ethanol; E15 is now available at more than 2,500 retail locations in 30 states. In Indiana alone, there are already 261 retail locations selling E15. E15 is approved for all vehicles model-year 2001 and newer, representing more than 95% of the vehicle miles traveled on the road today and more than 9 out of ten cars on the road. Consumers have now driven more than 25 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 it was approved over a decade ago. A recent [study](#) has also shown that if Indiana moved to statewide E15, the state could reduce greenhouse gas emissions by 455,000 tons annually – the equivalent of removing nearly 100,000 cars from Indiana roads each year.

Growth Energy commends the department for its support of E15 sales and appreciates this opportunity to comment on this proposed rule to add definitions and regulations for gasohol in the state. While we do not believe the changes are necessary to further facilitate the legal sale of E15 as more than 250 retailers currently offer the fuel for sale legally today, we have no objections, support the department's efforts, and offer two minor clarifications to the proposal as follows:

1. The following section references the federal publication of 40 CFR 1090.80 on July 1, 2020. The final federal regulation was actually published on December 4, 2020 and should be clarified.

Sec. 4. (a) When used in this document, references to the following publications shall mean the version of the publication listed in this section. 40 CFR 1090.80 (July 1, 2020) is hereby incorporated by reference.

2. Additionally, the proposal references **410 IAC 12.1-2-2 Octane Standards**. Currently, that section refers to ASTM D4814-13a, Standard Specification for Automotive Spark-Ignition Fuel, 2013 Edition. As the Department is updating the regulation, it only makes sense to update this reference to simply "ASTM D4814" which should make it the most recent version and encompass any and all subsequent updates. The department may also wish to do the same with other ASTM standards that reference 2013 as well, but for D4814, we suggest the following:

410 IAC 12.1-2-2 Octane standards Authority: IC 16-44-3-5 Affected: IC 16-44-3 Sec. 2. (a) Motor fuel shall conform to ASTM D4814-13a, "Standard Specification for Automotive Spark-Ignition Engine Fuel", 2013 Edition.

Given our extensive industry experience as well as with retailers around the country offering ethanol blends, we are happy to answer any questions and assist the department with any issues related to the sale of E15. Thank you in advance for your consideration.

Sincerely,



Chris Bliley, Senior Vice President of Regulatory Affairs

