

**Comments of the Boat Owners Association of The United States  
Regarding Renewable Fuel Standard Program  
Docket ID: EPA-HQ-OAR-2016-0004**

**July 11, 2016**

On behalf of The Boat Owners Association of The United States, BoatU.S., we submit the following comments to express our significant concerns with the proposed standards and renewable volume obligations (RVO) for the Renewable Fuel Standard (RFS) Program, Docket ID: EPA-HQ-OAR-2016-0004. Representing over a half-million members nationwide and as the largest provider of non-emergency recreational boat towing services, we have a unique perspective on the effects this proposal will have on the recreational boating consumer.

It is important to recognize that recreational boats and marine engines operate under a very different set of circumstances than automobiles. They are not used every day, are often stored unused for long periods of time and, by their very nature, are in a wet environment. Additionally, marine engines are generally kept in service far longer than automobile engines. As more ethanol has been blended into the nation's fuel supply to meet the RFS mandate, these distinct characteristics have led to significant problems for many boat owners.

Most boats do not get used every day. According to the 2014 Recreational Boating Statistical Abstract, boats were used an average of 23 days per year<sup>1</sup>. This infrequent usage leads to fuel being stored for extended periods, increasing the opportunity for it to absorb moisture. Boats are in a wet environment to begin with, so gasoline stored in boats' fuel tanks are at much greater risk of absorbing moisture and having the ethanol/water phase separate. This not only makes the fuel unusable (and creates an expensive disposal problem), but once drawn into the engine, the fuel can severely damage the engine.

On a regular basis, our members tell us they prefer gasoline without ethanol. In active recreational boating areas, where it is allowed by federal law, there are numerous gas stations and marinas offering ethanol-free gasoline or E0. This fuel is often at a premium price as compared to fuel containing ethanol. We are concerned that the proposed RVOs will make it increasingly difficult for boaters to find E0. By EPA's own calculations, if the proposed levels are adopted, only 200 million gallons of E0 will be available in 2017 as compared to 5.3 billion gallons of E0 consumed in 2015<sup>2</sup>. This is a 98.5% decrease in the availability of E0.

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<sup>1</sup> 2014 Recreational Boating Statistical Abstract, National Marine Manufacturers Association

<sup>2</sup> Energy Information Administration, Almost all U.S. gasoline is blended with 10% ethanol, Today in Energy (May 4, 2016) <http://www.eia.gov/todayinenergy/detail.cfm?id=26092>

We continue to question EPA's calculation of the E0 demand. The source for the projected demand relies upon a limited review of information and does not fully capture the recreational boating fuel market. The memorandum<sup>3</sup> presumes that the only demand for E0 from recreational boats would come from marina fuel sales. In reality, 95 percent of all recreational boats are less than 26 feet in length, the size considered "trailerable" and are far more likely to fuel at conventional gas stations. EPA should reevaluate the demand for E0 from the recreational boating market. In addition, it fails to account for other user demand for E0 such as all the other small engines in our garages, including snowmobiles, lawn equipment, and generators.

Having more E15 in the marketplace (in response to the proposed RVOs) is a substantial concern for recreational boat owners. It is well established that E15 will cause damage to marine engines.<sup>4</sup> With E15 now approved for sale in approximately 23 states, it is increasingly likely that boat owners will see it where they fuel. With only one small warning label for dispensing E15 (among the many) required on pumps, the prospect of misfueling of boats is significant. The EPA should provide a far more robust program for ensuring adequate safeguards be in place to protect boat owners from inadvertently using E15, damaging their engines and voiding their warranties.

With the recent \$100,000,000 subsidy from the U.S. Department of Agriculture for the nationwide installation of blender pumps (EPA estimates up to 1,500 new ones next year), we are also concerned with the increased chance a boater could fuel with higher ethanol blend involuntarily. We understand that a certain amount of residual fuel remains in blender pump fuel hoses if a previous customer selected a high ethanol blend. This raises the chance that gasoline with ethanol higher than 10% will be put into a boat's engine and the boat owner will suffer its costly negative consequences. Should the previous customer have chosen E85 for example, the boat's engine could receive a destructive dose of the wrong fuel with no warning or way to prevent it from happening. Additional consideration should be given to revising misfueling mitigation plans and the USDA's Biofuels Infrastructure Partnership grant program to prevent this from occurring.

EPA must carefully weigh the impact the proposal will have on the availability and affordability of gasoline that is safe for use in marine engines. Boat owners recognize that renewable fuels are an important component of our nation's energy future. However, they also have a reasonable civic expectation that EPA will ensure that the fuel in the marketplace will not damage their engines and place their families at risk on the water.

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<sup>3</sup> EPA Memorandum "Estimating E0 Volume Sold in the U.S. at marinas" 2015

<sup>4</sup> 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, National Renewable Energy Laboratory 2011