



Ohio Ethanol Producers Association



January 24, 2020

Fran Elson Houston  
Ohio Department of Agriculture  
Division of Weights and Measures  
8995 E. Main Street  
Reynoldsburg, Ohio 43068

Re: Letter Opposing Proposals FAL 20.2 and FAL 20.3

Dear Ms. Houston,

We write to ensure you are aware of our opposition to the proposals: FAL 20.2 and FAL 20.3, that have been submitted to the National Conference on Weights and Measures for consideration. Our organizations represent Ohio's biofuel industry and the thousands of farmer producers that supply our seven ethanol plants with corn. Our two organization spend significant resources to expand ethanol market share in support of U.S. agriculture, who just experienced one of the worst growing seasons in history. Allowing FAL 20.2 and FAL 20.3 to drive policy will harm our members and will do nothing to improve oversight of ethanol-based fuels.

Ethanol is a high quality, consistent component in gasoline that must adhere to strict fuel quality specifications. At a time of significant motor fuel consumption, nearly every gallon of gasoline in the United States contains a minimum of 10% ethanol and 15% ethanol blends are gaining market share. This includes almost all gasoline sold in Ohio. Consumers have now driven more than 8 billion miles on 15% ethanol blends and retailers have conducted millions of transactions. Here in Ohio we have worked successfully with your office to ensure Ohio consumers have access to cleaner, less expensive, home-grown fuel.

The FAL 20.2 and FAL 20.3 proposals create dual regulatory authority for Federal regulation, placing additional burden on state government personnel with no technical justification. It is our preference that state level officials focus on the business of the state and not duplicate the efforts of Federal Agencies. U.S. Environmental Protection Agency already has a robust compliance program and misfuelling mitigation in place for E15 including a required sampling program that ensures proper blending and labeling. The FAL 20.2 and FAL 20.3 proposals are duplicative and unnecessary.

These proposals have no merit and will simply create a duplicative, unnecessary structure that burdens state government and places another hurdle in front of our industries. We urge you to oppose the FAL 20.2 and FAL 20.3 proposals by identifying these items to be



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“withdrawn” from consideration at the National Conference of Weights and Measures Interim Meeting at the upcoming meeting the week of January 27<sup>th</sup>, 2020.

Thank you for your consideration. Please feel free to contact us with comments or questions.

Respectfully submitted,

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cc: Craig Van Buren, Chair, National Conference on Weights and Measures  
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