United States Senate
WASHINGTON, DC 20510

December 4, 2007

President George W. Bush
The White House
Washington, D.C. 20500

Dear Mr. President:

We write to urge your Administration to carefully evaluate and respond to unintended public health and safety risks that could result from the increased use of ethanol as a "general purpose" transportation fuel. You have called for a national effort to reduce consumers' demand for gasoline by 20 percent in ten years, in part through increased use of renewable transportation fuels such as ethanol. In addition, the Senate, as part of its pending energy legislation, has adopted language that would significantly increase renewable fuel use – particularly the use of ethanol – over the next two decades.

Currently, under federal law, the maximum level of ethanol permitted to be blended with gasoline for use in conventional gasoline-powered vehicles, equipment and engines is 10 percent – so-called E10. There is an interest in increasing ethanol blends to 15 percent (E15), 20 percent (E20), or even 30 percent through an expedited process at the Environmental Protection Agency (EPA) pursuant to a fuels waiver under Section 211(f)(4) of the Clean Air Act. Currently, there is little available data on the emission, air quality, public health, or safety impacts of mid-level ethanol. Therefore, to avoid unintended harm to air quality, to consumers and to gasoline-powered vehicles and equipment, the following concerns must be addressed before EPA takes such a step:

- On-road and non-road engines, vehicles, and equipment (other than flexible fuel motor vehicles) are not designed to be operated on ethanol blends higher than E10. The available evidence indicates that lawn mowers, chain saws, snowmobiles, recreational boats, motorcycles, and non-flex fuel motor vehicles will produce higher evaporative and engine exhaust emissions if ethanol blends higher than E10 are used.

- Ethanol blends higher than E10 are more corrosive on certain metals and plastics used in many of these products and will cause many gasoline-powered engines to run hotter and at higher RPM levels. In turn, this will result in adverse impacts on starting, durability, operation, performance, and operator safety, due to the degradation of critical components and safety devices.

To ensure there will not be damage to air quality or to consumers or their gasoline-powered products, there must be a comprehensive and scientific analysis of the impacts of ethanol blends higher than E10 in all gasoline-powered on-road and non-road engines, equipment, and vehicles. As part of any Section 211(f)(4) waiver decision for ethanol blends higher than E10, the EPA analytical process must, at a minimum, include the following:

- Testing of a representative and diverse mix of all gasoline-powered engines, vehicles, and equipment – on-road and non-road, large and small -- in which these higher ethanol blends will be used to assess potential increased emissions and long-term durability;

- Coordination of the analytical process by EPA with representatives of all stakeholders in this process, including at a minimum renewable fuel producers and marketers, on-road and non-road vehicle, equipment, and engine manufacturers, and public safety and environmental protection advocates;

- An analysis of the ability of the current wholesale and retail motor fuel distribution system to accommodate different levels of ethanol blends if blends higher than E10 are not suitable for use in all on-road and non-road gasoline-powered engines;

- Public notice and comment of all proposed EPA actions to consider or approve ethanol blends higher than E10, including, if necessary, public hearings; and,

- Final action by EPA to either approve or deny a petition to introduce into commerce ethanol blends higher than E10, along with publication of the agency's rationale for its decision.

We request information on all EPA's and the Department of Energy's (DOE) proposed or existing test programs and evaluations of the impacts of operating gasoline-powered on-road and non-road vehicles, engines, and equipment with ethanol blends higher than E10. Before these test programs and evaluations are implemented, EPA and DOE must provide a meaningful opportunity for comment and input from all stakeholders.

We look forward to working with you on these important issues. Thank you for your consideration of this request.

Sincerely,

Jack Reed

James M. Inhofe

Benjamin L. Cardin

Bernard Sanders

Susan M. Collins

cc: Administrator Johnson
Secretary Bodman