

April 29, 2019

The Honorable Andrew Wheeler
Administrator, Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

RE: Docket ID: EPA-HQ-OAR-2018-0775

Dear Administrator Wheeler:

The Kansas Corn Growers Association (KCGA) respectfully submits comments urging the EPA to move forward with the proposed RVP rule, allowing for year-round sales of E15. We also request this rule is made final by June 1 to avoid interruptions in the sale of E15. KCGA represents more than 1,000 members on state and national levels on legislative and regulatory issues and actively works with other organizations to maximize the voice of Kansas corn producers.

By allowing E15 to receive the same summer volatility adjustment EPA permits for E10, retailers will be able to offer drivers E15 year-round, providing choice to their customers without an interruption in sales between June and September. We agree with EPA's assessment that the conditions that led EPA to provide the original volatility adjustment for E10, at a time when 10 percent was the highest ethanol blend available, are "equally applicable to E15 today." Additionally, Kansas Secretary of Agriculture Mike Beam has submitted comments on the RVP rule, citing extensive research and testing from the Kansas Department of Agriculture's Division of Weights and Measures that came to the same conclusions.

The Kansas Corn Commission, in partnership with the Kansas Department of Agriculture, Renew Kansas and Kansas Sorghum provided cost-share to fuel retailers for the installation of blender pumps to give consumers increased access to higher ethanol blends with USDA's Biofuels Infrastructure Program. The sales data we receive from station recipients every month are clear: when given the opportunity to purchase fuel with increased ethanol blends, consumers respond positively, purchasing a cleaner burning, more cost-effective E15 fuel.

While our members are not direct participants in the RIN market, we recognize that EPA must ensure RIN market rules are fair to those who are blending biofuels to further the RFS and maintain an efficient RIN marketplace. However, there is substantial concern from the ethanol industry as to the effectiveness of the proposed RIN market modifications within this rule. As such, we encourage EPA to remove the RIN market modifications from this rule in order to prevent delays in E15 sales for this summer's driving season.

Again, thank you for the opportunity to provide comments on this very important issue to Kansas farmers and consumers.

Sincerely,



Greg Krissek, CEO
Kansas Corn Growers Association

