



November 18, 2025

Mr. Matt Botill
Division Chief
Industrial Strategies Division
California Air Resources Board
1001 I St
Sacramento, CA 95814

Re: Comments on Scoping Workshop on E15

Dear Mr. Botill,

The Renewable Fuels Association (RFA) appreciates the opportunity to comment on the *Scoping Workshop on E15 Use in California* held on October 14, 2025. The RFA is the leading trade association for America's ethanol industry. Our mission is to drive growth in sustainable renewable fuels and bioproducts for a better future.

RFA strongly supports the adoption of E15 in California. E15 saves consumers money at the pump, while reducing both greenhouse gas emissions and harmful tailpipe pollutants. Approval of E15 supports California's Climate Action Plan, while ensuring consumers have continued access to more affordable liquid fuels. RFA urges the Air Resources Board (CARB) to move as expeditiously as possible to 1) facilitate immediate implementation of AB 30, and 2) complete a rulemaking that updates California Reformulated Gasoline (CaRFG) regulations to include E15 gasoline blends.

The legislative intent of AB 30, which was signed into law on October 2, is crystal clear. The bill, which passed unanimously out of both the Assembly and Senate, authorizes E15 as a legal fuel in California, with the intent that retailers may immediately offer the fuel if they choose to do so. In addition, Governor Newsom has indicated the urgency of allowing California drivers to access E15, directing CARB more than one year ago to "prioritize resources that would allow for the expeditious completion of this process." Thus, to honor the statutory purpose and intent of AB 30 and the Governor's directive, **RFA strongly encourages CARB to prioritize immediate implementation of AB 30 so that California fuel retailers can offer E15 as soon as possible.**

- I. **CARB's FAQ issued on Nov. 10, 2025, regarding AB 30 implementation offers clear and actionable guidance for entities who wish to offer E15, with the lone exception of Question 13 focused on vapor recovery equipment.**

With the signing of AB 30 by Governor Newsom, Californians can now benefit from the cost savings and environmental performance of E15. RFA appreciates the leadership of Governor Newsom and the California Legislature in allowing for the immediate introduction of E15 while CARB completes a formal rulemaking process. Many California gasoline marketers are ready to sell E15 but require written guidance from CARB on some key issues before moving forward. RFA appreciates CARB's release of the E15 FAQ, but we suggest that CARB should clarify its answer to Question 13 of the FAQ regarding the certification of vapor recovery equipment to facilitate the immediate introduction of E15 in California.

In the FAQ, CARB states that vapor recovery equipment certified for E10 "will need to be certified for use with E15" and this will require the approval from four other state agencies (State Water Resources Control Board, Weights and Measures, OSHA and the Fire Marshall). For the technical reasons outlined later in these comments, requiring a separate E15 certification process for vapor recovery equipment is entirely unnecessary and would undermine the purpose of AB30, which is to allow immediate sales of E15. We respectfully request that CARB revise the FAQ to clarify the agency's perspective that existing E10 vapor recovery systems are compatible with E15, and that CARB will treat existing E10 systems as certified for E15. Such an affirmative statement is a necessary step for the other relevant agencies to register their approvals.

In our conversations with gasoline marketers, many have specifically stated that they will not be moving forward with E15 until the vapor recovery system issue has been clearly resolved. A simple clarification of Question 13, as suggested, would clear up any ambiguity, allow for the other state agencies to quickly complete their approvals, and open up the market for E15 with significant affordability and environmental benefits.

II. RFA strongly recommends that CARB adopt E15 by updating the fuel specification in the CaRFG regulation and not through establishing an Alternative Fuels Specification in regulation.

With the passage of AB 30, E15 is now a legal fuel in all 50 states in the country. The EPA defines E15 as gasoline that contains 10.5 to 15 percent ethanol ([40 CFR 1090.80](#)). E15 is not an alternative fuel; rather it is an allowable gasoline blend that displaces other gasoline blends with lower concentrations of ethanol (e.g., E10), providing incremental supply along with cost savings and emission reductions from gasoline use. E15 is regulated as gasoline in every jurisdiction where the fuel is being sold today.

California defines E10 (the maximum allowable blend prior to passage of AB 30) as gasoline through CARB's CaRFG regulation ([Title 13 CCR Section 2250-2273.5](#)). In the staff presentation for the E15 scoping workshop, preliminary guidance from CARB states that E15 will need to comply with all the existing CaRFG regulations except for the oxygen content, clearly treating E15 in California as gasoline and not an alternative fuel. As CARB recognizes, E15 is used in conventional gasoline vehicles, not in alternative fuel vehicles.

In addition, it is clear that the intent of AB 30 is to treat E15 as gasoline (referring to E15 as a “blend of gasoline containing 10.5% to 15% ethanol by volume”). Moreover, Governor Newsom distinctly characterizes E15 as “an additional blend of gasoline” and a “gasoline fuel blend,” not an alternative fuel.

As in the rest of the country, E15 will displace E10 gasoline and will be produced, distributed and sold through the existing supply chain for gasoline. Given the significant economic and environmental benefits of E15 compared to E10 (particularly in California with declining gasoline refining and increases in gasoline imports), RFA believes that E15 will steadily displace E10 in the California gasoline market further supporting the case that E15 be regulated through the CaRFG regulation.

At the workshop, CARB staff indicated that a downside to utilizing the CaRFG regulation for E15 rulemaking would be a time-consuming and costly reworking of the California Predictive Model to include E15. However, based on what is already known about E15’s fuel properties and emissions profile, revising the Predictive Model is unnecessary. The emissions testing conducted at U.C. Riverside for the Multimedia Evaluation (MME) process, along with testing results from the U.S. Department of Energy, reveal that E15’s fuel properties are essentially the same as E10, while E15’s emissions of key pollutants and overall smog-forming potential are lower than E10.

The preliminary guidance issued by CARB regarding implementation of AB 30, which allows gasoline blenders to use existing certified CARBOB to make E15, correctly recognizes that the compositional differences between E15 and E10 are negligible. Allowing the use of existing CARBOB to make E15 is the most fungible, lowest-cost route for introducing E15, while providing additional GHG and criteria emissions benefits. Through formal rulemaking, CARB can simply codify this approach into regulation without requiring a protracted and costly update to the Predictive Model. There may be other reasons to update the Predictive Model (via a separate process) but simply certifying E15 is not one of them.

RFA also strongly supports CARB’s allowance of “splash blending” ethanol with certified CaRFG (E10) to create E15. This option provides greater flexibility for fuel blenders and marketers who wish to offer E15 and is a common method of E15 blending used in other parts of the country.

A simple change to the CaRFG regulation to allow for E15 blending with existing certified CARBOB and CaRFG is the most appropriate, quickest, and lowest cost approach for incorporating E15 into California’s gasoline supply while maintaining maximum flexibility in the fuel supply system to provide both E15 and E10 blends.

Some have suggested that adding E15 to the CaRFG regulation could result in effectively “mandating” the fuel because gasoline must meet CaRFG specifications before it may be sold. This concern is completely unfounded. The CaRFG regulation can be modified to include E15 as an option to E10, not a mandated replacement of the

fuel. It is worth noting that E15 is sold today in many Federal RFG areas without any issues whatsoever; fuel marketers in these areas are able to certify that both the E10 and E15 they sell meets all applicable Federal RFG requirements.

RFA strongly discourages the use of an alternative fuel definition to facilitate E15 introduction. Using this route would create confusion in the marketplace and could significantly limit the adoption of the fuel. Defining E15 as an alternative fuel could preclude E15 from being sold from the same hose as other gasolines, which would unnecessarily require significant investment in retail dispensing equipment in the state. California has encouraged single-hose fueling configurations, which is the preferred method for dispensing E15 elsewhere today.

III. California’s existing gasoline supply chain infrastructure has a very high degree of readiness for E15. There are no current—or anticipated—significant barriers at the terminal or retail station level that would restrict the distribution or blending of E15.

a. California’s existing fuel terminal infrastructure is ready to accommodate E15 blending, storage, and distribution.

Software & Programming: Terminals currently store ethanol and gasoline blendstock (i.e., CARBOB) separately. The products are mixed when delivery drivers arrive and use automated codes that result in various blends of gasoline blendstock and ethanol to be in-line blended. E15 is simply another mixture. Many terminal-operating companies and blenders in California have confirmed that software upgrades and programming changes have already been implemented to support the blending of E15.

Equipment & Storage: Several terminals have added storage capacity (or repurposed spare capacity) to accommodate rapid E15 expansion, but widespread adoption may not occur immediately. Given that E15 is not mandated, other terminal operators have not yet taken steps to store or distribute E15. It is also important to note that as E15 adoption grows, additional gasoline storage tanks may be repurposed for ethanol storage, reducing the need for additional infrastructure investment. The materials compatibility of existing terminal equipment is addressed later in these comments.

b. There are no current or foreseeable restrictions at the station level that would prevent the distribution or sale of E15 in California. The appropriate retail infrastructure is largely in place for E15 deployment.

Underground Storage Tank (UST) systems: Due to the requirements of California’s UST Rule that will be fully implemented on Dec. 31, 2025, we believe at least 90% of all UST systems will be compatible with E15 starting in 2026, according to information provided by the California Water Board. This is an overly conservative estimate based on our review of the Water Board’s UST database, and we believe an even higher percentage of existing UST systems will be compatible with E15 (see final section of

these comments for additional discussion). Every tank manufactured after 1990 is compatible with up to E100. The overwhelming majority of associated underground fuel lines/piping, pumps, thread adhesive, etc. are also E15 compatible according to attestations and warranty statements from manufacturers.

Fuel Dispensers:

California has approximately 120,000 fuel dispensers statewide, with 7–10% replaced annually under normal conditions. Based on this:

- Conservative scenario (7% turnover):
 - 8,400 dispensers are replaced annually
 - Full turnover of all dispensers in the state every 14 years
- Aggressive scenario (10% turnover):
 - 12,000 dispensers are replaced annually
 - Full statewide turnover every 12 years

Given regulatory and market drivers—such as EMV compliance requirements, technology upgrades, environmental regulations, and E15/E85 compatibility requirements—RFA believes dispenser turnover has likely exceeded the high-end estimate shown above. Since all dispensers sold since 2008 are E15-compatible, RFA estimates that nearly all of California’s existing dispensers are fully compatible with E15.

c. Evidence of equipment compatibility with E15 is readily available from manufacturers

Fuel Dispensers: Three manufacturers (Wayne/Dover, Gilbarco Veeder-Root and Bennett) produce all the dispensers that have been installed in the last 20 years. For more than 18 years, these manufacturers have explicitly stated that all their dispensers are compatible with, and warranted for, E15.

- **Wayne/Dover Fueling Systems:**
 - All dispensers approved for up to E15
 - Since 2014: All dispensers approved for up to E25
 - Since 2023: Ovation models approved for E40 (Helix remains E25)
- **Gilbarco Veeder-Root:**
 - Since 2008: All dispensers approved for E15
 - Since 2011: Encore S dispensers approved for E25
 - Currently evaluating E40 compatibility; announcement expected in early 2026
- **Bennett Pump Company:**
 - All dispensers approved for up to E15
 - Since 2014: All dispensers approved for up to E25

Stage II Vapor Recovery Systems: Three manufacturers produce the stage II vapor recovery systems that are currently employed at California retail fuel stations. CARB has already clarified that the equipment produced by one of these manufacturers (Healy/Franklin Fueling Systems) is certified for up to E15.

- **Healy (Franklin Fueling Systems):**
 - CARB-certified [for up to 15% ethanol](#)
 - Covered under [Executive Order VR-201](#)
 - Warranty includes E15
- **EMCO Wheaton:**
 - Confirmed to RFA that equipment is E15 compatible and covered by warranty
 - CARB has previously allowed EMCO components to be mixed into VST systems to resolve nozzle failures
- **VST:**
 - Reported to RFA that equipment has not been tested for E15 compatibility; thus, no warranty confirmation provided

There is no scientific evidence or justification for not allowing the existing stage II vapor recovery equipment certification to be extended to E15. Again, the fuel properties and evaporative emissions characteristics of E15 and E10 are essentially identical. Indeed, the Reid vapor pressure (RVP) of E15 is no higher—and is likely slightly lower—than the RVP of E10. Thus, there is no concern that vapor loss would be meaningfully different for E15, and in fact is likely slightly lower.

As part of the Tier II research under the E15 MME process, U.C. Riverside conducted evaporative emissions testing on four vehicles. The study found evaporative emissions for E15, on average, declined 22% compared to evaporative emissions for E10. However, given the small sample, the results were not statistically significant, with researchers concluding that there is essentially no difference between the two fuels.

Hanging Hardware: Most “hanging hardware” (i.e., fuel outlet fitting, hose, breakaway, nozzle, and swivel) manufactured in the last 20 years is fully compatible and warranted for E15, meaning the overwhelming majority of equipment installed in the field today is E15 compatible. While some older hanging hardware may not be E15-compatible, replacement parts are widely available and affordable. This allows any fuel retailer with a compatible dispenser to replace the hanging hardware quickly and at a lower cost.

Overall, it is clear that the overwhelming majority of equipment—from the terminal to the retail station—is already compatible with E15. We strongly recommend that CARB (and the other agencies involved) continue the practice of accepting manufacturer statements, attestations, and warranties as the basis for approving the compatibility of

equipment for the storage and distribution of E15. This approach aligns with the approach adopted by U.S. EPA and other state agencies.

IV. With regulatory clarity, adoption of E15 could occur quickly at retail stations in California

During the workshop, CARB asked for comment on how retail stations will implement E15. There are multiple ways that retail stations across the country have implemented E15 and RFA believes that California will be no different. The approach will vary depending on existing equipment, regulatory restrictions, availability of supply, market dynamics, access to capital and more. Here are the three most likely approaches that will be seen, based on adoption in other areas:

1. **E15 replaces E10 as a regular unleaded gasoline option.** This option generally requires no additional infrastructure changes, other than ensuring that all components are compatible with E15.
2. **E15 replaces E10 as a midgrade gasoline option.** If the retail station has multiple USTs, it may choose to offer E15 as the midgrade fuel option. In this scenario, no additional infrastructure changes are required, other than ensuring that all components are compatible with E15.
3. **Blending E15 onsite (at retail) using E85 and E10 utilizing blending dispensers (“blender pumps”).** Many existing retailers who offer E15 (i.e., outside of California) utilize this approach, whereby a large volume of E10 is mixed with a small volume E85 to create E15. This approach holds special promise for California given 1) that E85 is already broadly deployed at retail in the state, and 2) the ethanol content of E85 does not vary (seasonally or from site to site) in California, as it does in other states. The infrastructure changes needed in this scenario would be the blending dispensers, piping and adding E85 (dispensers, tank, piping), if not already installed. This is how E15 was initially introduced across the country before terminals began to offer pre-blended E15. More than 2,000 fueling sites still offer E15 using this approach today. Retailers will have to follow federal and state requirements.
 - a. **E15 adoption rates at California retail stations and terminals are difficult to project and will depend on numerous factors. However, the ability to sell E15 year-round in California, the demonstrated economic benefits of E15, and the E15 readiness of California’s existing gasoline supply chains lead us to believe adoption can occur quickly and will be widespread over the longer term.**

During the scoping workshop, CARB asked for feedback on expected E15 adoption rates by retailers and terminals. Predicting the rate of E15 adoption is difficult and depends on numerous market and regulatory factors. While E15 adoption rates observed in other parts of the United States may be somewhat instructive, it seems

likely that California could experience more rapid E15 adoption due to important differences in the California marketplace.

First, one of the most significant impediments that has slowed adoption in other parts of the country—disparate summertime volatility regulations for E10 and E15—does not exist in California. In many parts of the country, E10 and E15 are held to different RVP requirements during the summertime ozone control season (i.e., E10 is afforded a 1-psi RVP waiver, whereas E15 is not). This means petroleum refiners would need to produce and distribute separate gasoline blendstocks (BOBs) for E10 and E15 in conventional gasoline markets during the summertime—something they have not done due to logistical and cost constraints. This barrier does not exist in California because CaRFG regulations do not provide a 1-psi RVP tolerance to E10; in other words, E10 and E15 will be held to the same volatility standard and, therefore, may use the same CARBOB that is already widely available in the marketplace.

However, even in some states where the summertime E15 “barrier” exists, E15 has significantly penetrated the market. In Iowa, E15 is offered at nearly 30% of retail stations, while 25% of Minnesota retail stations offer the fuel—with many of these stations adding E15 in just the last 3-5 years. According to the Iowa Renewable Fuels Association, E15 is expected to account for roughly one-third of gasoline sales volumes in 2025.

Second, California typically has the highest retail gas prices in the nation and the state’s consumers have demonstrated a high sensitivity to retail gas prices. In other states, E15 is usually discounted by 15-30 cents compared to E10 and recent analysis by economists U.C. Berkeley and the U.S. Naval Academy found that California consumers could expect to see a 20-cent per gallon (adjusted for energy content) discount with E15. When unadjusted for energy content (i.e., the prices consumers would actually see at the pump), this benefit is more likely to be in the 21-22 cent per gallon range. Consumer surveys conducted by organizations representing fuel retailers routinely show that gas prices are the primary factor influencing a consumer’s decision on where to purchase fuel. Thus, E15’s lower price is likely to drive rapid adoption by California retail stations, fuel suppliers, and ultimately, consumers.

Third, as demonstrated in other sections of these comments, California’s gasoline supply chain appears to have a higher level of “readiness” for E15 than other parts of the country. Due to the state’s unique UST regulations, decades of experience with storing and distributing E10 and E85, and average age of retail stations, the infrastructure needed to store and distribute E15 is largely already in place and fit for purpose.

The most important factor influencing E15 adoption is likely to be the regulatory requirements that are ultimately implemented by CARB. Accordingly, we are encouraged by CARB’s approach so far to AB 30 implementation and the agency’s decision to make efficient use of existing regulatory systems already in place (i.e., EPA’s misfuelling mitigation plan, existing CaRFG regulations, etc.). We urge CARB to

take similarly efficient and expeditious approach to a rulemaking that modifies CaRFG regulations to include E15 without substantially revising the Predictive Model.

b. The costs for a fuel retailer to offer E15 will vary depending on the current infrastructure and equipment existing at each station.

There are essentially four levels of E15 readiness at retail stations, and the cost to achieve readiness can vary significantly. The State of California has the readiest opportunity of any state for E15 by far, especially given the upcoming deadline on USTs. The cost to adopt the RFA's Misfuelling Mitigation Plan (MMP), the only EPA-approved MMP, is minimal and registering for the fuel compliance survey is free, unless the station intends to blend onsite.

Four levels of E15 readiness:

1. The retail station currently has equipment that is recognized as compatible with E15. The station is ready and only needs labeling, which can be acquired for free or a few dollars per dispenser.
2. The retail station needs new "hanging hardware," which can cost as little as \$200-500 per dispenser. The required addition of labels is outlined above.
3. The retail station needs to replace some above-ground equipment components or minor below-ground components that are not recognized or identifiable as E15-compatible, which could cost several thousand dollars depending on the equipment that needs upgraded. The addition of labels is outlined above.
4. The retail station requires fundamental upgrades to offer E15. In these cases, the station is likely in need of significant upgrades *simply to continue doing business as usual* (i.e., offering E10 or E0 gasoline). In these cases, costs are not associated solely with a transition to E15. For example, the station has aging tanks (older than 30 years) or dispensers beyond their serviceable life; the equipment will need replacement, or the station will need to cease operations entirely. In cases where major equipment upgrades and replacement are necessary, the newly installed equipment will be E15-compatible. In other words, the state of equipment at these stations is not simply a barrier to offering E15...it is a barrier to remaining in operation at all. These scenarios are highlighted by the California Water Boards recent advisory and in CARB's recent Scoping Workshop. The addition of labels is outlined above.

V. Consumers stand to benefit from meaningful cost savings as E15 becomes more widely available in California. A faster adoption rate will expand access to lower-priced gasoline options and help stabilize or reduce statewide fuel prices by increasing overall supply.

During the workshop, CARB asked for input on potential cost savings to consumers resulting from E15, taking into account E15's slightly lower energy density compared to E10. Appendix A to these comments provides photographic evidence of E15 price

savings observed at stations across the Midwest during the first two weeks of November 2025. The fuel economy testing conducted by U.C. Riverside (under the direction of CARB and other stakeholders) found only a 1.3% average reduction in mileage for E15 compared to E10 across twenty vehicles. Some vehicles (typically later model years with gasoline direct injection engines) actually showed fuel efficiency gains due to E15's higher octane.

Given that E15 currently sells at roughly a **7-9% discount** to E10 nationally, according to E15prices.com, this small mileage difference is more than offset by the lower per-gallon price, resulting in net savings for California consumers. The following example, based on recent observed E10 and E15 prices at Midwest locations, shows E15 providing a 6% lower cost per mile traveled compared to E10.

	Mpg*	\$/gallon**	\$/mile	\$/year/household***
E15	28.28	\$2.79	\$0.099	\$2,448
E10	28.65	\$2.99	\$0.104	\$2,572
Difference	-0.37	\$(0.20)	\$(0.005)	\$(124)
Difference %	-1.3%	-7.2%	-5.8%	-5.1%

*CARB/UCR vehicle testing

**E15prices.com (national average)

***Federal Reserve Bank of St. Louis and Bureau of Transportation Statistics

Retailers also have strong economic incentives to offer E15, supported by RIN values, LCFS credits, and favorable ethanol-to-CARBOB price spreads. Based on the readiness of the infrastructure in the state, along with these factors that create enhanced profit margins, it is unlikely that infrastructure or compliance costs will be passed on to consumers.

Finally, because ethanol and gasoline BOBs are stored separately in at terminals, E10 prices should remain stable even as E15 use grows. It will be many years, if not decades, before E10 becomes a niche fuel, ensuring that consumers continue to have affordable and accessible options during the transition.

VI. The E15 misfuelling mitigation strategies required by U.S. EPA have worked effectively to prevent misuse and misfuelling. No additional state requirements are necessary to prevent misfuelling.

U.S. EPA's existing regulatory requirements related to labeling, dispenser configurations, and the E15 fuel compliance survey are more than sufficient to prevent misfuelling and ensure consumer protection. To date, there have not been any verified reports of misfuelling, engine damage or inferior performance due to E15. Given the robustness of existing compatible infrastructure and the absence of adverse incidents, RFA believes that no additional state requirements are necessary to prevent misfuelling.

The CARB staff presentation cited an old OPEI survey of ~3,000 small engine owners (of which two-thirds actually owned gas-powered engines) to suggest additional misfuelling education may be necessary. However, the OPEI survey was conducted more than five years ago, and small engine manufacturers have substantially improved their marketing efforts to educate customers on the approved fuels for their equipment. No substantiated cases of E15 misfuelling in small engines have been reported.

Additionally, many small engine equipment manufacturers sell high-priced ethanol-free “fuel in a can” along with their equipment as an alternative to educating consumers about approved fuel uses. That said, initial education regarding approved fuels by the OEMs has improved substantially since this OPEI survey was published several years ago. This includes graphics on fuel caps, enhanced wording in owners’ manuals, and other measures to better educate owners of this equipment.

Regarding light-duty vehicles and misfuelling, the automobiles sold in California have the same compatibility as those sold in the rest of the country with regard to E15. According to the California Energy Commission, there are 26.9 million gasoline and gasoline-hybrid vehicles on the road in California today. During the CARB workshop, it was suggested that 2.26 million vehicles are model year 2000 or older, equating to 8% of the on-road fleet. This suggests 92% of the on-road light-duty auto fleet is 2001 model year and newer. However, this likely understates the number of vehicles legally approved by U.S. EPA for E15 because many of those 2000 model year and older vehicles are flex fuel vehicles (FFVs) capable of running on up to 85% ethanol blends. Other private data sources suggest approximately 95% of vehicles on the road in California today are legally approved to use E15. In addition, the literature shows that vehicle miles travelled (and fuel consumption) are heavily weighted toward newer vehicles, while older vehicles are driven much less frequently.

The MMP, developed by RFA and approved by EPA in 2012, has been widely adopted by over 99% of E15 suppliers. It outlines clear protocols for labeling, dispenser setup, and survey participation. The EPA-approved compliance survey, conducted by the RFG Survey Association, routinely verifies ethanol content and labeling accuracy. Additionally, the labeling requirements (e.g., placement of the E15 label on the upper two-thirds of the dispenser) further minimize the risk of misfuelling. The label is the largest required fuel label in the marketplace and clearly outlines what vehicles can use the fuel and what engines should not.

VII. RFA disagrees that there are 5,100 USTs and 2,000 additional piping systems in the state that are not compatible with E15, as suggested by CARB staff during the workshop.

On Nov. 18, 2025, the California Water Resource Control Board provided RFA with the actual database of USTs used to calculate the estimates of non-compatible systems presented during the scoping workshop. The database shows a total of 4,931 total tanks that are not compatible with E15 (versus the estimate of 5,100 presented during the workshop). But more importantly, the total number of facilities where those tanks are

located is only 1,707, with approximately 1,400 of those open to the public (i.e., roughly 300 facilities are private/closed to the public). In addition, the database likely includes some USTs that no longer exist, have been abandoned, or have permanently been removed from service. For example, the installation date for some tanks in the database is labeled as the year “1900.” Ultimately, even if the count of 4,931 incompatible USTs is accurate, that represents 13% of the total USTs in the state. But if the database were to be updated to remove all USTs that are permanently out of service or abandoned, the share of California USTs that are incompatible with E15 is likely 10% or less. Even if 10% of the tanks in the state are truly incompatible with E15, that means 90% of existing systems *are* compatible—a higher rate than observed in many other parts of the country where E15 is currently deployed.

Further, only 82% of the reported facilities with incompatible tanks are accessible to the public. The rest of the facilities are privately owned or government operated, such as airports, marinas, law enforcement centers, fire stations, and hospitals. The database also does not include any specific information on piping systems. Despite the estimate presented during the scoping workshop of “2,000 additional piping systems” not being compatible with E15, the Water Board database does not include information (e.g., pipe installation date or date of manufacturing) to substantiate this claim. CARB also did not provide estimates of how many of these incompatible USTs will be replaced or permanently removed from service as a result of the Dec. 31, 2025, deadline for closing or upgrading all single-walled USTs that do not have secondary containment and continuous leak detection.

Aging tanks (and piping systems, if they exist) will be replaced soon if these stations intend to continue operations; that is a cost of doing business, whether or not the stations decide to offer E15. The Water Board has also advised RFA that the grants and loans under the for Replacing, Removing, or Upgrading Underground Storage Tanks (RUST) program could be made available for station owners to replace these tanks and piping systems to speed up their replacement.

The bottom line is that the compatibility of existing UST systems in California will not be significant barrier to adoption of E15 across the state.

VIII. Conclusion

Thank you for the opportunity to comment on CARB’s E15 scoping workshop. With the passage of AB 30, California has a remarkable opportunity to deliver lower-cost, cleaner-burning fuel to the state’s drivers. We appreciate CARB’s efforts to expeditiously implement AB 30 in parallel with a formal rulemaking process to add E15 to the CaRFG regulations.

We stand ready to continue our work with CARB to 1) ensure the rapid completion of guidance allowing immediate sale of E15, and 2) undertake a rulemaking that formally approves E15 as another gasoline option in the state.

If you have questions or need additional information, please contact Robert White at rwhite@ethanolrfa.org.

Sincerely,

A handwritten signature in black ink that reads "Geoff Cooper". The signature is written in a cursive, flowing style.

Geoff Cooper
President and CEO