



COMMONWEALTH OF KENTUCKY  
OFFICE OF THE GOVERNOR

Andy Beshear  
GOVERNOR

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June 30, 2022

Mr. Michael S. Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
Mail Code 1101A

Ms. Janet McCabe  
Deputy Administrator  
Office of Enforcement and Compliance Assurance (OECA)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
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Dear Mr. Regan and Ms. McCabe:

Under the Clean Air Act, Section 211, 42 U.S.C. § 7545(c)(4)(C)(ii)(I), I request the U.S. Environmental Protection Agency issue a temporary waiver to address the continued extreme and unusual fuel supply circumstances caused by international supply issues. Much like the E15 Fuel Waiver issued by your office on June 9, 2022, there are other measures that can be taken to ease the fuel supply crisis while having a negligible effect on public health and air quality.

While issuing a waiver on E15 during this period is greatly appreciated and welcomed by American drivers, E15's availability is limited. In fact, according to RBN Energy, an energy market consultancy firm, E15 is only offered in about 2,300 stations nationwide, only comprising about 1.5% of the 150,000 fueling stations. Increasing costs for corn will likely erode any price advantage E15 may have over conventional gasoline.

There is another alternative: butane. Butane is a common additive to wintertime blends of gasoline across the country. Its use promotes the more efficient combustion of fuel in colder temperatures. However, during the summer months and due to Reid Vapor Pressure (RVP) requirements, there is a glut of this additive. Butane has historically been relied upon as a historically cost-effective way to blend gasoline during periods of supply disruptions. In fact, in the spring of 2021, when the Colonial Pipeline was offline, the Biden Administration issued an RVP waiver to allow blenders to utilize butane to increase the fuel supply and lower costs for

consumers. It is appropriate to once again consider this measure, as butane has averaged \$1.51 per gallon as compared to ethanol's \$2.87 per gallon over the period from April 1, 2022 to June 22, 2022.

As you know, the summertime RVP for most of the country is 9 PSI. By issuing the waiver to allow an increase to 11.5 PSI, the blend would result in an approximate 5% increase in additional gasoline. An increase to 13.5 PSI, the standard that would be applicable in October in Kentucky, would increase the supply by 9%. I believe this is a common sense alternative and I urge the Biden Administration to use all resources available to help lower prices.

Sincerely,



Andy Beshear  
Governor