November 25, 2019

The Honorable Donald J. Trump
President
The White House
1600 Pennsylvania Avenue
Washington, DC

Dear Mr. President:

As leaders of the Governors Biofuels’ Coalition, we respectfully request that you direct the Administrator of the U.S. Environmental Protection Agency to enforce Section 202 of the Clean Air Act Amendments of 1990. Doing so will require improvements in gasoline quality that will lower both toxic emissions and fuel costs caused by the use of gasoline aromatics. Enforcing Section 202 will reduce health care costs, ease stationary and mobile source emission compliance burdens, and help automakers meet fuel efficiency and carbon rules without increasing harmful transportation carbon and aromatic emissions.

Congress banned lead as a gasoline octane booster in the Clean Air Act. During the debate that preceded the vote on the amendments, Senators noted the enormous economic and human costs that leaded gasoline imposed on society. The Congressional Record is filled with pages detailing the parallels between lead and aromatics. The Senate voted 69-30 to direct EPA to reduce aromatics in gasoline to the “greatest extent practicable” as technological advances became available. The House concurred, and President George H. W. Bush signed the amendments into law in November 1990.

Now, nearly 30 years later, the average gallon of gasoline is composed of nearly 30 percent toxic aromatics in order to increase octane required by today’s engines. As oil prices have risen, aromatic costs have followed, with consumers paying the price. Aromatics are the most expensive, least energy efficient, and most carbon intensive and toxic part of gasoline. Scientific advances have confirmed that aromatics are the primary contributor to urban particulate matter — specifically aromatic aerosols, and nano-sized ultra-fine particulates coated with toxic polycyclic aromatic hydrocarbons — the product of the incomplete combustion of aromatics.
Automakers have now confirmed that advanced engine designs, such as direct injection, needed to meet the fuel efficiency standards, will make ultra-fine particle emissions worse. In fact, studies show that direct injection engines are also expected to make emissions worse unless fuel quality standards are improved. One practical and cost-effective way to reduce aromatics is to use 30 per cent ethanol blends to reduce particulate matter and black carbon emissions by 45 per cent, and hydrocarbon pollution by more than 20 percent.

The marketplace will deliver a variety of ways to reduce gasoline aromatics, including biofuels, as well as electric and natural gas vehicles. However, for that to happen, EPA must do as Congress directed: reduce mobile source air toxics to the greatest extent possible.

We look forward to working with you to help Americans achieve healthier and more economically secure lives, while further reducing the nation’s use of deadly aromatics in gasoline and replacing them with renewable biofuels.

Sincerely,

Tim Walz, Chair
and Governor of Minnesota

Kristi Noem, Vice Chair
and Governor of South Dakota

cc: The Honorable Andrew Wheeler, Environmental Protection Agency Administrator
The Honorable Sonny Perdue, Secretary of Agriculture
The Honorable Lisa Murkowski, Chair, Energy and Natural Resources Committee
The Honorable Joe Manchin, Ranking Member, Energy and Natural Resources Committee
The Honorable Frank Pallone, Chair, House Energy and Commerce Committee
The Honorable Greg Walden, Ranking Member, House Energy and Commerce Committee
The Honorable Ed Markey, Member, Clean Air and Nuclear Safety Subcommittee
The Honorable Doug Hoelscher, Special Assistant to the President, White House Office of Intergovernmental Affairs
The Honorable Francis Brooke, Special Assistant to the President for Energy and Environmental Policy
Member Governors