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March 24, 2020

Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Via gunasekara.Mandy@epa.gov

Assistant Administrator
U.S. Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Mail Code 2201A, Room 3204 WJC South
1200 Pennsylvania Avenue, NW
Washington, DC 20460
bodine.susan@epa.gov

Re: Request for Conventional Gasoline RVP/RFG Volatility Waivers

Dear Administrator Wheeler and Assistant Administrator Bodine:

The American Fuel & Petrochemical Manufacturers (AFPM) writes to request a narrowly tailored waiver allowing retail operations and terminal operators additional time to transition from winter to summer gasoline. A waiver is necessary to address the “extreme and unusual fuel supply circumstance” that will prevent the distribution of an adequate supply of gasoline to consumers nationwide.

Specifically, we request EPA exercise its authority under Clean Air Act §211(c)(4)(C)(ii) and (iii) to temporarily waive the summertime conventional gasoline RVP and RFG volatility requirements and simultaneously prohibit entities from adding fuel or fuel additives in a manner that inhibits the prompt drawdown of existing inventories of wintertime gasoline.

Unlike events that have led to prior RVP waivers, such as hurricanes or pipeline disruptions, the ability to produce low RVP gasoline has not been compromised. Refiners have already converted their operations and begun producing low RVP BOBs required for summer gasoline. The problem facing the fuel distribution system is the inability to drawdown and convert fuel distribution tankage. This is because COVID-19 has drastically reduced the demand for gasoline and this demand destruction has resulted in the inability to deplete winter RVP gasoline volumes



from terminal storage tanks. This demand destruction and its impact on tankage turnover times were unforeseeable and could not be prevented.

The inability to quickly turnaround gasoline storage tanks in this low demand environment requires EPA to issue the waiver described above. To balance the environmental benefits from the transition to summertime gasoline, additional measures should be considered to facilitate the prompt turnover of terminal and retail tankage.

We look forward to discussing these measures in greater detail. If you have any questions, please don't hesitate to contact me.

Respectfully,

Chet Thompson
President and CEO

cc: Dan Brouillette, Secretary of Energy