

June 19, 1978

Director, Mobile Source
Enforcement Division
U.S. Environmental Protection Agency
401 M Street, S. W.
Washington, D. C. 20460

Application: Waiver of 211(f) Clean Air Act Amendments of 1977

Applicants:

1. James Lustgarten, President
"Gas Plus", Inc.
300 O Street
Lincoln, Nebraska 68508
2. Al Mavis, Director
Farm Energy Conservation Program
Illinois Dept. of Agriculture
Springfield, Illinois 62790

Reason:

1) The above-named manufacturers of Gasohol, a blend of 90% unleaded regular gasoline and 10% anhydrous ethanol, request a waiver of 211(f) Clean Air Act Amendments to permit Gasohol's distribution and sale.

2) 211(f)(4) provides: "The Administrator, upon application of any manufacturers of any fuel or fuel additive, may waive the prohibitions established under paragraph (1) or (3) of the subsection if he determines that the applicant has established that such fuel or fuel additive or a specified concentration thereof, and the emission products of such fuel or additive or specified concentration thereof will not cause or contribute to a failure of any emission control device or system (over the useful life of any vehicle in which such device or system is used) to achieve compliance by the vehicle with the emission standard with respect to which it has been certified pursuant to section 206."

3) Gasohol deserves such a waiver due to the fact it has never been shown to cause or contribute to the failure of any emission control device or system installed on vehicles or engines to achieve compliance with applicable emission standards.

4) The above named manufacturers lack the tremendous resources necessary for the type of testing EPA 211(f) guidelines require.

5) Therefore, until such time as the Environmental Protection Agency completes its own testing of Gasohol, we wish to submit thorough testing performed on the emission effects of 10 percent methanol and unleaded regular gasoline, as well as testing performed by Atlantic Richfield with mixtures of tertiary butyl alcohol and gasoline. Both of these alcohols are substantially similar to ethanol where emission control is concerned.

6) Research on ethanol blends has been but a fraction of the effort devoted to methanol blends. We are submitting what is presently available, but until such time as more extensive research is completed, we request and are prepared to accept a temporary waiver of 211(f).

Supporting Documents:

The following is a list of documents we submit to support this application:

a. Ethanol blends -

1. Alcohol: The Renewable Fuel from Our Nation's Resources. Republican Conference, U. S. Senate, October 1977, pp. 12-36.
2. Methanol and Ethanol Fuels - Environmental Health and Safety Issues. Graham Hagey, et al. pp. 16-20
3. Three-Way Conversion Catalysts on Vehicles Fueled with Ethanol Gasoline Mixtures. J. J. Mooney, Sao Paulo, Brazil, January 1978.

b. Methanol blends -

1. On the Trail of New Fuels. Alternative Fuels for Motor Vehicles, West German Ministry for Research and Technology, 1974.
2. Alternate Air-Fuel Induction System Contrasts in Terms of Fuel Economy and Exhaust Emissions for Simulated Driving Cycles with Methanol and Indolene. M. D. McCormack and R. K. Pefley, University of Santa Clara, Santa Clara, California 95053.
3. Utilization of Methanol as an Automotive Fuel - A Report II EC-2, The Inter-Industry Emission Control Program. R. E. Baker, J. A. Harrington, et al.

4. Predicted Methanol-Water Fueled ST Engine Performance and Emissions. Louis H. Browning and Richard K. Pefley, University of Santa Clara, Santa Clara, California 95053

c. Tertiary Butyl Alcohol blends -

1. Technical Data. Atlantic Richfield Company.

This application is being submitted with the assistance of the U. S. Senate Republican Conference. Further requests or notifications should also be forwarded to Thomas Graves, Professional Staff, U.S. Senate Republican Conference, Room 333, Russell Building, Washington, D.C. 20510 (224-3496).