Retail gasoline stations may be confused regarding E15 pump labeling and Reid vapor pressure (RVP) requirements. There are federal and state RVP requirements on summer gasoline to reduce hydrocarbon emissions, because hydrocarbon emissions are a ground-level ozone precursor. E15 is gasoline and is subject to gasoline's RVP standards.

In addition, EPA promulgated pump label regulations in 2011 when E15 is sold at retail. EPA's required pump label applies all year and is not seasonal (e.g., one for the winter and a different label for the summer) and cannot be altered without prior EPA permission. Recently, EPA clarified the issue. EPA published its proposal for the Renewables Enhancement and Growth Support rule at 81 FR 80828 (11/16/16). The Agency stated that summer RVP cannot be circumvented by relabeling; "intended use" on a pump label does not exempt E15 from fuel quality requirements (see 81 FR 80863):

> All gasoline, including E15, is subject to all of the requirements applicable to gasoline because of its formulation, not because of its end use. These requirements cannot be circumvented by relabeling. Allowing a fuel to be exempted from fuel quality requirements simply based on a statement of its intended use would undermine the EPA's ability to assure compliance with fuel quality requirements.

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