

GAO

Report to the Chairman, Subcommittee on
Energy and Power, Committee on Energy
and Commerce, House of Representatives

January 1989

GASOLINE MARKETING

States' Programs for Pump Labeling of Gasoline Ingredients



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Resources, Community, and
Economic Development Division

B-227776

January 12, 1989

The Honorable Philip R. Sharp
Chairman, Subcommittee on Energy
and Power
Committee on Energy and Commerce
House of Representatives

Dear Mr. Chairman:

Pursuant to your request and subsequent discussions with your office, we obtained information concerning states' gasoline pump labeling practices and state officials' views on whether a uniform nationwide label for gasoline ingredients would be beneficial. You asked for this information because the Subcommittee wanted to determine whether a need existed for a federal uniform pump label listing gasoline ingredients. The information in this report is based solely on the responses to a questionnaire that we prepared and sent to 56 state officials.¹ We provided this information in testimony before your Subcommittee on September 27, 1988.

Results in Brief

Fifty of 56 state officials responded to our questionnaire. The states vary in their pump labeling programs, but 39 of 50 responded that their states require pump labels to disclose gasoline ingredients. All 39 states require pump labeling of alcohol fuels; however, the states' requirements vary as to how alcohol should be listed on the pump label. Although the majority of the states with labeling requirements seem satisfied with their programs, about one-half of all 50 respondents favored a federal uniform label for gasoline pumps. Counting just the responses of the states that expressed an opinion on a federal uniform label, about two-thirds of these 37 states favored a federal uniform pump label. Twenty-eight state officials commented on what should be included on a federal uniform pump label, but no consensus on what should be listed on such a label was evident from the responses. (App. II provides additional details on the questionnaire results.)

Background

Federal and state governments currently have some gasoline pump labeling requirements. The federal government requires the labeling of

¹"State officials" refers to officials of the 50 states, the District of Columbia, Puerto Rico, and 4 U.S. territories. We received responses from 47 states, the District of Columbia, Puerto Rico, and the Virgin Islands.

lead content and the posting of octane ratings,² while many of the states require pump labeling of alcohol fuels.

In the past, lead additives were used to raise the octane rating of gasoline. In the early 1980s, the Environmental Protection Agency (EPA) began reducing the levels of lead permitted in leaded gasoline because lead contaminates the environment. Thereafter, EPA required that gasoline pump labels list the presence of lead.

In 1978, the Congress enacted the Petroleum Marketing Practices Act (PMPA), which among other things, required that octane ratings of automotive gasoline be disclosed to consumers. This was intended to enable consumers to buy a gasoline with an octane rating that is high enough to prevent engine knock and to help consumers avoid buying more costly gasoline with an octane rating higher than their needs.

In addition to the federal labeling requirements for octane ratings and lead, many states also have pump labeling requirements. The federal phasedown of lead in gasoline led the petroleum industry to find other ways to increase gasoline octane ratings. These other methods included blending alcohols with gasoline to produce higher octane fuels. As alcohol fuels gained more acceptance, the states, in order to enable consumers to comply with automobile manufacturers' fuel specifications, began requiring pump labeling for alcohol fuels in the mid-1980s. (App. I contains more information on the background of pump labeling requirements.)

States' Pump Labeling Requirements

Thirty-nine of the states responding to our questionnaire require that retail gasoline stations place labels on their pumps disclosing gasoline ingredients. Twenty-six of those states have laws requiring pump labeling, while the others have various bases for requiring labeling, such as state regulations and rules.

In all 39 states with pump labeling requirements, these requirements are primarily concerned with the disclosure of alcohol fuel content, such as ethanol and methanol, in gasoline. The states' alcohol labeling requirements were established primarily for consumer protection. Half of the

²The octane rating of gasoline indicates its resistance to engine knock. Knock occurs when a portion of the fuel explodes or detonates spontaneously and prematurely in the cylinder of the engine instead of burning smoothly. The higher the octane rating, the greater the resistance to knock.

states specifically indicated that alcohol labeling would enable consumers to comply with automobile manufacturers' fuel specifications.

The states' pump labeling requirements for alcohol usually specify that gasoline must contain a certain minimum volume of alcohol to require alcohol labeling on the pump, and these minimums vary by state. The states' requirements also vary as to how alcohol content should be listed on the pump label; the requirements range from a general label, such as "Contains Alcohol," to specific labels stating the type and percentage of alcohol. Finally, the states' requirements for their alcohol pump labels vary with respect to the height and width of the letters, type of print to be used, color of the letters, color of the label background, and location of the label on the gasoline pump. (App. V shows a sample of the states' gasoline ingredient pump labels.)

The states have various enforcement penalties available, such as fines, stop sales, and warnings, for pump labeling violations, and the states vary in the extent to which they enforce their pump labeling requirements. Some states enforce their programs to a greater extent than others.

Although the states' pump labeling programs vary, 22 out of 39 states with gasoline pump labeling requirements reported that they were satisfied with their programs. When asked whether changes were needed to their pump labeling programs for gasoline ingredients, 22 state officials responded that changes were not needed, 9 responded that changes were needed, and 8 responded that they were uncertain or had no basis to judge whether their programs need changing.

States' Views on a Federal Uniform Pump Label

Thirty-seven of the 50 respondents expressed an opinion on whether a federal uniform pump label for gasoline ingredients would be beneficial. About half of the respondents that answered our questionnaire (24 out of 50) favored a federal uniform label, a quarter (13) were opposed, and the remaining quarter (13) were uncertain or had no basis to judge whether a federal label was needed. However, counting only the responses of the officials with opinions, about two-thirds of these 37 states favored a federal uniform pump label. The states gave various reasons for supporting or opposing a federal label; for example, supporters of a federal uniform label liked the idea of uniformity, while opponents were concerned about enforcement or preemption of state laws.

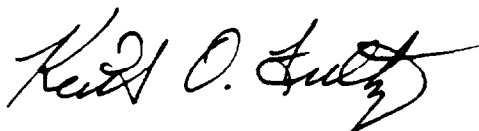
Twenty-eight respondents commented on what should be included on a federal uniform pump label. Their comments ranged from very general, such as labeling any ingredient that significantly alters the behavioral characteristics of the base gasoline, to very specific, such as labeling alcohol content. No consensus on what should be listed on such a label was evident from the states' responses. (App. VI lists the state officials' specific comments.)

Scope and Methodology

In February 1988, we prepared and sent questionnaires to 56 state officials regarding state gasoline pump labeling practices and the need for a nationwide uniform gasoline pump label. We received 50 responses to our questionnaires from 47 states, the District of Columbia, Puerto Rico, and the Virgin Islands. We did not verify any of the data that the states provided to us. (App. III contains additional information on our methodology, and app. IV provides a copy of our questionnaire.)

As arranged with your office, we are providing copies of this report to the 50 state officials who responded to our questionnaire and to other interested parties. Major contributors to this report are listed in appendix VII. Should you need further information, please contact me on (202) 275-1441.

Sincerely yours,



Keith O. Fultz
Senior Associate Director

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Abbreviations

EPA	Environmental Protection Agency
PMPA	Petroleum Marketing Practices Act

Background on Pump Labeling Requirements

Federal and state governments currently have some pump labeling requirements. The federal government requires pump labeling of lead content and the posting of octane ratings, while many of the states require pump labeling of alcohol fuels.

In the past, lead additives were used to raise the octane number of gasoline. In the early 1980s, the Environmental Protection Agency (EPA) began reducing the levels of lead permitted in leaded gasoline. As part of its "lead phasedown" project, EPA required labels on gasoline pumps to inform the public of the presence of lead. Earlier, in 1978, the Congress saw a need to inform the public of octane ratings of gasoline and enacted the Petroleum Marketing Practices Act (PMPA) to require uniform posting of gasoline octane ratings on pumps. This was intended to enable consumers to buy a gasoline with an octane rating that is high enough to prevent engine knock and to help consumers avoid buying more costly gasoline with octane ratings higher than their needs.

The federal phasedown of lead in gasoline led the petroleum industry to find other ways to increase the octane capabilities of gasoline. These methods included blending alcohols with gasoline to produce higher octane fuels. As alcohol fuels gained more use, the states began to consider establishing labeling guidelines for these fuels in order to enable consumers to comply with automobile manufacturers' fuel specifications. At the National Institute of Standards and Technology's 1984 Conference on Weights and Measures,¹ delegates from the states' and local governments' weights and measures offices voted to establish labeling guidelines for motor fuels containing at least 1 percent alcohol. Subsequently, many states implemented pump labeling for alcohol fuels.

¹The National Institute of Standards and Technology (formerly the National Bureau of Standards) sponsors the National Conference on Weights and Measures in partial implementation of its statutory responsibility for cooperation with the states in securing uniformity in weights and measures laws and methods of inspection. As one of its functions, the National Conference develops model uniform laws that are recommended to the states for use when the states are reviewing or amending their official laws and regulations in the areas covered.

Results of Questionnaire

We sent questionnaires to officials from the 50 states, the District of Columbia, Puerto Rico, and 4 U.S. territories (collectively referred to as "the states.") We received responses from officials from 47 states, the District of Columbia, Puerto Rico, and the Virgin Islands. This appendix contains a discussion of the responses to our questionnaire.

Do States Require Gasoline Ingredient Pump Labeling?

Of the 50 state officials that responded to our questionnaire, 39, or about three-quarters, have requirements that retail gasoline stations disclose one or more ingredients in gasoline on pump labels. Twenty-six of those states have laws requiring pump labeling. The others have various bases for requiring pump labeling, such as state regulations and rules.

Which Ingredients Do States Require on Pump Labels?

All of the 39 states with pump labeling requirements require gasoline stations to disclose the alcohol content, such as ethanol and methanol, in gasoline.

What Is the Basis for Requiring Alcohol Labeling?

Most of the states with alcohol labeling requirements require the disclosure of alcohol content for consumer protection. Twenty state officials specifically indicated that alcohol labeling would enable consumers to comply with automobile manufacturers' fuel specifications. In addition, three officials mentioned the National Conference on Weights and Measures' model law for motor fuel ingredients, which includes guidelines for disclosing alcohol in gasoline.

What Are the States' Alcohol Labeling Requirements?

The states' pump labeling requirements for alcohol usually specify that gasoline must contain a certain minimum volume of alcohol to require alcohol labeling on the pump, and these minimums vary by state. Most of the states (24 out of 39) require alcohol labeling for gasoline with at least 1 percent alcohol volume, while about half as many states (14 out of 39) require alcohol labeling only for gasoline with more than 1 percent alcohol volume. Only 1 state out of the 39 requires alcohol labeling for gasoline with less than 1 percent alcohol volume.

The states' requirements vary as to how alcohol content should be listed on the pump label. When the alcohol content of gasoline meets the minimum volume percentage, it is shown on the gasoline pump as alcohol,

ethanol, methanol, gasohol, and/or other categories, such as co-solvents.¹ Table II.1 shows the states' responses on labeling requirements.

Table II.1: States' Responses to Alcohol Labeling Requirements

Type of labeling	States that use this label
Alcohol	10
Ethanol	34
Methanol	29
Gasohol (10% ethanol blend)	8
Other	12

Note: 39 states answered this question.

State requirements range from using a general label, such as "Contains Alcohol," to specific labels requiring the type and percentage of alcohol. The state officials' responses to our questionnaire showed that most of the states require that the presence of ethanol and/or methanol in gasoline be specifically revealed on the gasoline pumps. For example, several states require that gasoline containing ethanol must be labeled "Contains Alcohol" with the word "Ethanol" and the percentage of ethanol in the gasoline printed below it. Some officials also mentioned that the presence of co-solvents must be marked on the pumps.

The states' requirements for noting alcohol content on pump labels also vary with respect to the height and width of the letters, type of print, color of the letters, color of the label background, and location of the label on the gasoline pump. (App. V shows a sample of the states' gasoline ingredient pump labels.)

What Are the States' Penalties and Extent of Enforcement?

The states have various enforcement penalties available, such as fines (32 states), stop sales (28 states), and warnings (18 states). The states vary in the extent to which they enforce their pump labeling requirements. Twenty-six state officials, or two-thirds of those with pump labeling programs, reported that their states enforce pump labeling requirements to a great or a very great extent. The remaining 13 state officials said that their states enforce their pump labeling requirements to a moderate extent, to some extent, or to little or no extent.

¹ A co-solvent is an alcohol or any other chemical with a heavier molecular weight than methanol or ethanol. It is blended with either or both to prevent phase separation in gasoline. Phase separation occurs if, on contact with water, the alcohol in gasoline leaves the blend and goes with the water.

Are Changes Needed to State Pump Labeling Programs?

Overall, 22 of the 39 officials (more than half) from states with gasoline pump labeling requirements reported that they were satisfied with their pump labeling programs. When asked whether changes are needed to their pump labeling programs, 22 officials responded that changes were not needed, 9 responded that changes were needed, and 8 responded that they were uncertain or have no basis to judge whether their programs need changing. Of the nine state officials that indicated changes were needed in their programs, two mentioned that they were concerned with improving enforcement of pump labeling.

Is There a Need for a Federal Uniform Pump Label?

About half of the 50 state officials that responded to our questionnaire favored a federal uniform gasoline pump label (24 out of 50). A quarter of the officials were opposed to a federal pump label and the remaining quarter had no opinion. Table II.2 shows a summary of the officials' responses to this question.

Table II.2: States' Responses to the Need for a Federal Uniform Pump Label

	States' responses	Percent
Definitely yes	11	22
Probably yes	13	26
Definitely not	5	10
Probably not	8	16
Uncertain	7	14
No basis to judge	6	12
Total	50	100

Counting just the officials that responded to our questionnaire with a "yes" or "no" answer, 24 of these 37, or about two-thirds, favored a federal uniform pump label. Of the 24 officials that favored a federal pump label, 7 cited "uniformity" as a positive factor. One official commented, for example, that the consumer should be able to purchase petroleum products that are uniform in nature when interstate travel is required. Three officials that favored a federal pump label commented that a uniform label would help consumers follow vehicle manufacturers' fuel specifications, while two others cited environmental or safety reasons. One official favored a federal label only to the extent of identifying oxygenated fuels.

Of the 13 state officials that are opposed to a federal uniform pump label, 3 cited enforcement reasons. One commented, for example, that

unless the federal government is going to fund and enforce legal requirements, it should stay out of the process. Another official commented that labeling requirements are meaningful only if there is an effective compliance and enforcement program, and since only the states are likely to conduct such compliance and enforcement programs on motor fuel labeling, it makes no sense for the federal government, overextended as it is, to become involved in the gasoline ingredient labeling business.

Two state officials that are opposed to a federal uniform pump label expressed concern about preemption of state laws. One commented that a federal law would be so watered down as to be totally inadequate, and it would probably preempt more stringent state laws. The other commented that uniformity by consensus of the regulators is desirable, but preemption of state law, by whatever name, is unproductive and undermines existing programs. Another official, who indicated he had no basis to judge whether a federal uniform label was needed, expressed concern about a rigid federal law preempting a state law that might be more flexible and appropriate.

What Should Be Listed on a Uniform Label?

Twenty-eight state officials responded to our request for a list of ingredients that should be included on a federal uniform pump label. No consensus on what should be listed on such a label was evident from the states' responses. Their comments ranged from very general to very specific labeling. For example, one official said that any ingredient that significantly alters the behavioral characteristics of the base gasoline or any ingredient that may require a warning label because of public health concerns should be on a pump's label. Another said that all necessary information that would benefit a buyer's and seller's health and would help protect the vehicle should be included on a uniform pump label.

More specifically, 17 officials said that alcohol should appear on a federal pump label. One official volunteered, for example, that consumers need to know whether alcohol blended fuels contain ethanol or methanol, and what percentage, because some automobile warranties can be voided by improper dilutions of alcohol. Three state officials noted that oxygenates should be included on a federal label. One of them commented that, in order not to discriminate against specific types of alcohols, all oxygenates should be labeled. (The state officials' specific comments are listed in app. VI.)

Scope and Methodology

To address the questions that the Chairman asked us to review concerning pump labeling, in February 1988 we sent questionnaires to the 50 states, the District of Columbia, Puerto Rico, and 4 U.S. territories (American Samoa, Guam, the Mariana Islands, and the Virgin Islands) to survey them on their ingredient pump labeling programs. We sent the questionnaires to state officials, primarily in the states' Weights and Measures offices, whom we had identified as being responsible for ingredient pump labeling programs. We received 50 responses to our questionnaires from 47 states, the District of Columbia, Puerto Rico, and the Virgin Islands.

We contacted specific states between March and August 1988 to clarify some individual responses to questions, but we did not verify any of the data that the states provided to us. We also did not evaluate or do any analysis of our own on issues, such as safety, health factors, environmental problems, and consumer protection, that are related to gasoline ingredient pump labeling because this was outside the scope of our work.

Pump Labeling Questionnaire



U. S. GENERAL ACCOUNTING OFFICE
SURVEY OF STATES AND TERRITORIES
GASOLINE OCTANE TESTING AND INGREDIENT PUMP LABELING

INTRODUCTION

The U. S. General Accounting Office, an independent agency responsible for evaluating federal programs for the U.S. Congress, is surveying the 50 states and U.S. territories to obtain information on gasoline octane testing and pump labeling of gasoline ingredients. The Subcommittee on Energy and Power, U.S. House Committee on Energy and Commerce, has asked us to determine which states have octane testing programs and pump labeling requirements, what they are like, and what results they obtain. If your state has no octane testing or ingredient pump labeling programs, please answer all applicable questions about your state.

We may have contacted you several months ago asking for similar information. In order to ensure that we obtain consistent data from all the states and territories, we are requesting that you fill out this questionnaire, which also covers additional areas and topics.

Please return your questionnaire in the enclosed business reply envelope. Your reply within two weeks of receipt will help us avoid costly followup mailings.

(1-3)
Q1(4-5)
308788 (6-11)

PLEASE GIVE THE FOLLOWING:

YOUR STATE/TERRITORY:

CONTACT PERSON:

PHONE NUMBER:

() _____

Note: This questionnaire consisted of two parts: Part I - Octane Testing and Part II - Ingredient Pump Labeling. The results of the octane testing part of the questionnaire will be included in a separate report on that subject to be issued at a later date. Part II of the questionnaire follows.

Appendix IV
Pump Labeling Questionnaire

(1-3)
60(4-5)
308788 (6-11)

PART II - INGREDIENT PUMP LABELING

The following questions apply to state requirements for gasoline pump labeling of ingredients such as alcohol, benzene, etc.

1. Does your state currently have any retail pump labeling requirements for gasoline ingredients? (CHECK ONE)

(12)

1. ☐ Yes -- GO TO NEXT QUESTION
2. ☐ No -- SKIP TO QUESTION 11

2. What is the basis for these state requirements? (CHECK ALL THAT APPLY)

(13-16)

1. ☐ State law
2. ☐ State regulation
3. ☐ Administrative rule
4. ☐ Other (PLEASE SPECIFY)

3. Please provide a copy of the state requirements referred to in above question. Please also include a sample of an actual pump label.

(17)

4. Does your state require pump labeling relating to alcohol content of fuel? (CHECK ONE)

(18)

1. ☐ Yes -- GO TO NEXT QUESTION
2. ☐ No -- SKIP TO QUESTION 8

5. What must the volume percentage of alcohol be to require alcohol labeling? (CHECK ONE)

(19)

1. ☐ Less than one percent
2. ☐ One percent
3. ☐ More than one percent

--PLEASE GIVE PERCENTAGE _____%
(20-22)

6. For gasoline exceeding the percentage in question 5, how is alcohol shown on the pump label? (CHECK ALL THAT APPLY)

(23-27)

1. ☐ Alcohol
2. ☐ Ethanol
3. ☐ Methanol
4. ☐ Gasohol
5. ☐ Other (PLEASE EXPLAIN)

Appendix IV
Pump Labeling Questionnaire

7. What precipitated your state requiring alcohol pump labeling? (PLEASE CHECK ALL THAT APPLY AND EXPLAIN BELOW)

(28-30)

1. ☐ Automobile owners' manual fuel specifications
2. ☐ Consumer protection
3. ☐ Other

8. What state penalties, if any, are available for gasoline ingredient pump labeling violations? (CHECK ALL THAT APPLY)

(31-35)

1. ☐ NO REMEDIES AVAILABLE
2. ☐ Warning
3. ☐ Stop sales
4. ☐ Fines
5. ☐ Other (PLEASE SPECIFY)

9. To what extent does your state currently enforce its pump labeling requirements for gasoline ingredients? (CHECK ONE)

(36)

1. ☐ To little or no extent
2. ☐ To some extent
3. ☐ To a moderate extent
4. ☐ To a great extent
5. ☐ To a very great extent

10. In your opinion, do you feel that changes to your state's pump labeling program for gasoline ingredients are needed? (CHECK ONE)

(37)

1. ☐ Definitely yes
2. ☐ Probably yes
3. ☐ Uncertain
4. ☐ Probably not
5. ☐ Definitely not
6. ☐ No basis to judge

Appendix IV
Pump Labeling Questionnaire

11. In your opinion, do you think that there is a need for a federal uniform nationwide pump label for gasoline ingredients? (PLEASE CHECK ONE AND EXPLAIN BELOW)

(38)

1. ☐ Definitely yes
2. ☐ Probably yes
3. ☐ Uncertain
4. ☐ Probably not
5. ☐ Definitely not
6. ☐ No basis to judge

12. If there is a need for a federal uniform nationwide pump label for gasoline ingredients, what do you believe should be included on the label? (PLEASE LIST AND EXPLAIN BELOW)

(39)

13. A bill has been introduced in the Congress which would require posting of health hazard warning labels on gasoline pumps to inform consumers of the presence of benzene levels exceeding levels naturally occurring in gasoline because benzene has been shown to cause leukemia in humans. In your opinion, do you believe that this federal requirement is needed? (PLEASE CHECK ONE AND EXPLAIN BELOW)

(40)

1. ☐ Definitely yes
2. ☐ Probably yes
3. ☐ Uncertain
4. ☐ Probably not
5. ☐ Definitely not
6. ☐ No basis to judge

14. Please provide any additional comments you wish to make on pump labeling in your state. Attach additional sheets if needed.

(41)

Sample of States' Gasoline Ingredient Pump Labels

CONTAINS ALCOHOLS

_____ % MTBE

CONTAINS ALCOHOL
 5% METHANOL
 5% TERTIARY BUTANOL

MEETS MICH. QUALITY & PURITY STANDARDS FOR
UNLEADED PREMIUM
CONTAINS: ETHANOL 10%
CONSUMER COMPLAINT TOLL FREE HOTLINE
CALL 1-800-MDA FUEL

**UNLEADED
WITH 10% ETHANOL**

**CONTAINS 10%
ETHYL ALCOHOL**

CONTAINS 10% ETHANOL

**THIS FUEL CONTAINS
Ethanol 10%**

STATE OF MARYLAND
COMPTROLLER OF THE TREASURY
MOTOR VEHICLE FUEL TAX DIVISION
ONLY

**GASOLINE
ETHANOL**

Shall be dispensed from this pump in compli-
ance with Maryland laws and regulations.

 C64588

**ALCOHOL
CONTENT**

MAX % BY VOLUME
 ETHANOL _____ %
 METHANOL _____ %
 ALCOHOL COSOLVENT _____ %
CT. LAW REQUIRES THE
DISCLOSURE OF ALCOHOL
CONTENT OVER 1 PERCENT

NOTICE OF ALCOHOL CONTENT MUST BE POSTED PURSUANT TO C. 1-8-8-11

ALCOHOL CONTENT
Maximum Percentages, By Volume:
 Ethanol _____ %
 Methanol _____ %
 Cosolvent Alcohol _____ %

THIS FORM HAS BEEN APPROVED BY THE MICHIGAN DEPARTMENT OF REVENUE

Note: Labels are not to scale.

State Officials' Suggestions as to What Should Be Included on a Federal Uniform Pump Label

Alabama	List any ingredient that significantly alters the behavioral characteristics of the base gasoline or any ingredient that may require a warning label because of public health concerns.
Alaska	List ingredients only to distinguish between hydrocarbon and oxygenated fuels.
Arizona	List all necessary information that would benefit the buyer's and seller's health and help protect the vehicle.
Arkansas	List the alcohol content for alcohol blended fuels.
Colorado	Consumers need to know whether alcohol blended fuels contain ethanol or methanol and what percentage of the fuel is ethanol or methanol. Some automobile warranties can be voided by improper dilutions of alcohol.
Delaware	List the percentage of alcohol (methanol and ethanol) content.
District of Columbia	List the percentage and type of gasoline ingredients.
Florida	Use Florida's rule, which requires a pump label stating "contains alcohol-ethanol" or "contains alcohol-methanol."
Hawaii	Labels should list octane, lead content, and alcohol content.
Illinois	In order not to discriminate against labeling specific types of alcohols, all oxygenates should be labeled. Consumers do have problems with other types of alcohols and oxygenates.
Maine	Indicate the amount and type of any alcohol included.
Maryland	Indicate the type of alcohol whenever the content exceeds 1 volume percent, and/or give some warning when the fuel is not pure hydrocarbon (whenever it contains an oxygenate or something other than straight hydrocarbons, other than normal anti-rust, anti-oxidant additives, etc.). Anything that has an impact upon a vehicle's performance versus performance when using a straight hydrocarbon product should be listed.
Michigan	List any substance in gasoline, other than gasoline, in quantities greater than .25 percent. Also, list <u>any</u> metals.
Minnesota	Minnesota generally follows National Bureau of Standards Handbook 44 and National Conference of Weights and Measures labeling guidelines.
Missouri	Label should use the word "CONTAINS" and list the percentage and type of each alcohol additive.
Nevada	List octane number and additives such as methanol, ethanol, benzenes, and other cleaners used to keep fuel injection systems operating correctly.
New Jersey	All ingredients that affect octane should be listed on the label.
New Mexico	List the type and amount of added ingredients.
North Carolina	If vehicle manufacturers qualify warranties or warn against the use of a fuel with a particular ingredient, that ingredient should be indicated on the label.
North Dakota	List gasoline grade and percentage and type of alcohol present.
Ohio	The Ohio rule is patterned, in part, after the National Bureau of Standards' Model Law.
Oklahoma	States should be responsible for pump labeling, not the federal government.

(continued)

**Appendix VI
State Officials' Suggestions as to What
Should Be Included on a Federal Uniform
Pump Label**

Puerto Rico	Included on this label should be any and all ingredients capable of affecting, in any way, the proper behavior of a motor or the human body. This label should state the percentage of each ingredient present in the fuel.
Rhode Island	Label should list alcohol, ethanol, methanol, and gasohol, and any additive that has a health risk involved.
South Carolina	Information pamphlets and handouts would be more effective for the consumers who are really interested in the ingredients. State requires prominent labeling of alcohols by percentage, but most consumers do not understand the information provided.
Texas	List the percentage of alcohol, if any; the octane rating of fuel; and a benzene warning.
Vermont	List all harmful ingredients.
Washington	The contents of the label should be worked out at the National Conference on Weights and Measures.

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