Truly Sustainable Renewable Future

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Advanced Biofuels USA

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In EPA Tier 3 Comments Advanced Biofuels USA Introduces "E30 Capable" Idea to Bring Higher Octane, Higher Ethanol Gasoline to the Marketplace

For Immediate Release July 1, 2013—Frederick, MD As part of the recently proposed Tier 3 motor vehicle fuel and emission regulations, EPA included a very forward looking idea that could bring higher octane, higher ethanol gasoline to the marketplace. Advanced Biofuels USA staff synthesized conversations it has had over the past few months with leaders in the automotive and biofuels industries about these proposals to prepare comments, submitted today, that introduce the concept of "E30 Capable" vehicles as a practical key to transitioning to higher percentage blends of affordable renewable transportation fuels.

- EPA should allow vehicle manufacturers that certify new vehicles with the "higher octane, higher ethanol content gasoline" to also certify that those vehicle are able to also operate on existing E10 or E15 fuels. These vehicles would be called "E30 capable."
- By building up the number of these "E30 capable" vehicles that could get the same mileage with
 a lower cost fuel, the demand for E30 would increase. This demand would create a nationwide
 E30 infrastructure that would then allow for the marketing of "E30 Optimized" Vehicles designed

to provide the fuel economy and GHG reductions necessary to meet 2022 CO₂ reduction standards.

Since a higher proportion of lower cost ethanol is used to produce E30, the "higher octane,
higher ethanol content gasoline" would probably not be priced above current 87 octane E10
regular. Therefore, it should not be referred to as "premium" fuel in final regulations or for
purposes of marketing but rather should be labeled differently. For example, "E30 capable/E30
optimized regular" fuel.

In extended comments, Advanced Biofuels USA cautions that the "recipe" for these higher octane fuels must maintain current gasoline blend stock (BOB).

An internationally respected nonprofit educational organization, NOT a trade organization, Advanced Biofuels USA is dedicated to promoting the understanding, development and use of advanced biofuels as an energy security, economic development, military flexibility and climate change/pollution control solution. In addition to the "E30 capable" concept, Advanced Biofuels USA also suggests that, to provide a smooth path to making this "higher octane, higher ethanol content gasoline" available nationwide, EPA Tier 3 regulations should not require individual vehicle manufacturers to certify the availability of this fuel. Instead, EPA should use their authority under section 211 of the Clean Air Act to provide for the commercial availability of this "higher octane, higher ethanol content gasoline."

In using the Clean Air Act authority to assure that "higher octane, higher ethanol content gasoline" is available nationwide EPA should implement a reasonable phase-in schedule tied to manufacturer production plans required to meet 2017 and later EPA GHG requirements. This schedule should be based on the "vehicles would not operate appropriately on other available fuels, and such a fuel would result in equivalent emissions performance," information.

According to Advanced Biofuels USA's executive director, Joanne Ivancic, "We see this transition from high petroleum percentage fuel to higher renewable percentage fuels complementing the engine design work done by Ford (Ecoboost) and GM (Ecotech) and others in their efforts to achieve the new 54.5 mpg fleetwide CAFÉ standards."

Therefore, the comments explain, since these engine developments are being implemented for the sole purpose of meeting the 2022 EPA CO₂/DOT mpg standards while also providing enough power to compensate for the extra weight requirements of DOT safety standards, and are not being introduced for high performance reasons, engines using this integrated package of design features are as much emission control devices as the catalytic converters that caused EPA to issue lead elimination and sulfur reduction fuel control regulations to ensure lower HC, NO_x, and CO emissions.

For more information about Advanced Biofuels USA, see www.AdvancedBiofuelsUSA.org

Advanced Biofuels USA, a nonprofit educational organization advocates for the adoption of advanced biofuels as an energy security, military flexibility, economic development and climate change mitigation/pollution control solution. Our key tool for accomplishing this is our web site, www.AdvancedBiofuelsUSA.org, a resource for everyone from opinion-leaders, decision-makers and legislators to industry professionals, investors, feedstock growers and researchers; as well as journalists, teachers and students.

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