Press Release: Advanced Biofuels USA Files Comments on Transportation and Climate Initiative: Calls for Extension of Program to Aviation, Trains, Marine/Maritime, Agriculture, Rocket Launches and Natural Gas

For Immediate Release -- May 7, 2021, 2021—Frederick, MD -- -- Advanced Biofuels USA suggests an expansion of transportation emissions reduction in the Transportation and Climate Initiative (TCI) proposed Draft Model Rule (TCI-P) in public comments filed today. Currently, the proposed emission reduction program is limited to on-road fossil-derived motor gasoline and diesel fuel. Advanced Biofuels USA argues that does not go far enough to adequately improve the carbon footprint or air quality in the Mid-Atlantic and Northeast Region and suggests extending the program to cover aviation, marine/maritime, agriculture, rocket launches and natural gas used for transportation.

Advanced Biofuels USA is pleased that the TCI-P clearly recognizes that by applying the TCI-P to the fossil-derived component of transportation fuel, the use of non-fossil fuels is encouraged as a beneficial substitute for fossil fuels in transportation. Sustainable, renewable fuels are the quickest, least expensive, most effective way to reduce greenhouse gas emissions and other pollution for the greatest number of people and with the most immediate environmental justice impact.

The Transportation and Climate Initiative (TCI) is a regional collaboration of 13 Northeast and Mid-Atlantic states and the District of Columbia that seeks to improve transportation, develop the clean energy economy and reduce carbon emissions from the transportation sector. The participating jurisdictions are: Connecticut, Delaware, the District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, Vermont, and Virginia.

Advanced Biofuels USA, a nonprofit educational organization, advocates for the adoption of renewable fuels as the immediate solution to reduce greenhouse gas emissions. Consistent with this mission, the organization points out that to make a serious dent in transportation emissions, the fossil-derived portion of fuels in all transportation and agricultural sectors should be included in the TCI-P program.

The proposed “cap-and-invest” program distributes or auctions emissions allowances to participating jurisdictions’ fuel suppliers as a way to impose a cap or ceiling on allowed fossil

fuel carbon emissions. Suppliers purchase allowances at auction. The revenue from those allowance sales is then returned to the states to invest in cleaner, more efficient transportation solutions.

Advanced Biofuels USA's specific concerns include:

It is especially egregious that the TCI-P specifically excludes "aviation gasoline" defined as "A complex mixture of relatively volatile hydrocarbons, with or without small quantities of additives, blended to form a fuel suitable for use in aviation reciprocating engines and meeting ASTM Specification D910 or Military Specification MIL-G-5572." Not only should D910 fuel be included in the TCI-P to encourage transition to renewable fuel, but also because it is a leaded fuel (for which there exist alternatives). Environmental justice benefits would also accrue to communities located near airfields that sell and use this fuel to prevent lead poisoning.

In addition, there is no mention of aviation fuel that meets the standard of ASTM D1655-20d, the Standard Specification for Aviation Turbine Fuels. With many airports both large and small in the region, it seems that incentives to convert away from fossil fuel for air transport should also be a part of the TCI-P.

Another sector left out of this program is the agricultural sector. Diesel-powered farming equipment should not be overlooked as a source of GHG emissions. The carbon footprint of farming could be reduced with use of renewable fuels such as drop-in renewable diesel, biodiesel blends and renewable natural gas.

It appears that fossil diesel use in trains has also been omitted from this program. Some train systems are in the process of converting to renewable fuel. Such conversion should also be encouraged by the TCI-P, especially for the non-electric commuter train systems.

In addition, use of fossil compressed natural gas and liquid natural gas are omitted from the program and should be included.

Of greater import, marine/maritime fuels are also left out of this program. For a region that is situated along the East Coast of the US, transition to renewable fuels for the shipping sector should be encouraged as a way to also motivate using renewable fuels to comply with International Maritime Organization standards.

Also, the region has space launch facilities and the greenhouse gas emissions from fossil fuel used in missiles and rockets should also be included in the TCI-P in order to provide incentives for transition to renewable or otherwise low GHG emission missile/rocket fuels. Investment in research conducted in this area would benefit from recognition of the need for this sector to transition away from fossil fuel.

In addition, it might be a good idea to use a term like "non-fossil-derived fuel" instead of

"biomass-derived". For example, in "Biomass-derived content as a percent (i.e., percent of the total fuel volume that is not derived from any fossil fuel)." This would accommodate future fuels that are made from recycled carbon such as industrial waste gases and from green/renewable hydrogen and captured carbon dioxide or other non-biomass substances.

TCI continues to accept public comments at its public comment input portal.

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Advanced Biofuels USA, a nonprofit educational organization advocates for the adoption of advanced renewable fuels as an energy security, military flexibility, economic development and climate change mitigation/pollution control solution. Our key tool is our web site, www.AdvancedBiofuelsUSA.org, with a nearly 40,000-item online library, a resource for all from opinion-leaders and advocates, decision-makers and legislators to industry professionals, investors, feedstock growers and researchers; as well as journalists, teachers and students. We prepare technology and policy assessments, brief government staff, participate in conferences and lecture. Technology neutral and feedstock and product agnostic, our work is respected around the world.

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For reference: (Page 68)

XX-8.2 CO_2 emissions data report contents and mechanism for JURISDICTION fuel suppliers.

(c) *Content of monthly CO2 emissions data report.* Each CO2 emissions data report for a month shall contain the following information in a format prescribed by the REGULATORY AGENCY:

> *(1)* If the fuel is specified in the applicable fuel shipment data report to include only fuel that is derived from any fossil fuel, the fraction shall be 1.0.
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> Metric tons of CO_2 emissions from combustion of all transportation fuel disbursed or delivered to JURISDICTION during the month, as specified for the JURISDICTION fuel supplier in subdivision XX-8.1(b), including:

(i) Total monthly CO_2 emissions from the combustion of fossil fuel, with CO_2 emissions calculated for each fuel shipment as the product of the number of net gallons of transportation fuel, the fraction of the fuel that is derived from any fossil fuel, and a CO_2 emissions factor.

(ii) Any inputs used to calculate CO_2 emissions including, for each fuel shipment, as specified under subdivision XX-8.1(b):

(a) Product code. If the product code is not specified in the applicable fuel shipment data report, a conservative missing data parameter of the diesel fuel product code shall be used, and the fuel shall be treated as diesel fuel in clauses *(c)* and *(d)* of this subparagraph.

(b) The number of net gallons of transportation fuel. If the number of net gallons is not specified in the applicable fuel shipment data report, a conservative missing data parameter shall be used.

(c) The fraction, by volume, of the transportation fuel in the shipment that is derived from any fossil fuel (which equals 100% minus the biomass-derived content as a percent reported under paragraph XX-8.3(c)(7)), determined as follows:

(1) If the fuel is specified in the applicable fuel shipment data report to include only fuel that is derived from any fossil fuel, the fraction shall be 1.0.

(2) If the fuel is diesel fuel and the fraction of the fuel that is derived from any fossil fuel is not specified in the applicable fuel shipment data report, or is specified to be greater than or equal to 0.98, the percentage shall be 0.98.

(3) If the fuel is motor gasoline and the fraction of the fuel that is derived from any fossil fuel is not specified in the applicable fuel shipment data report, or is specified to be greater than or equal to 0.90, the percentage shall be 0.90.

(4) If the faction of the fuel that is derived from any fossil fuel is specified in the applicable fuel shipment data report to be less than 0.98 (for diesel fuel), or 0.90 (for motor gasoline), a lower percentage than 0.98 or 0.90, respectively, may be used only if that specific lower percentage is specified in such report.

(d) The CO2 emissions factor applied to the fraction of the transportation fuel in each shipment that is derived from any fossil fuel, which shall be:

(1) For motor gasoline, 0.00878 metric tons of CO2 per net gallon.

(2) For on-road diesel fuel, 0.01021 metric tons of CO2 per net gallon.