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Advanced Biofuels USA Supports Proposed Tier 3 Higher Octane Vehicle Fuel and Emissions Regulations, with Recommendations for Implementation

For Immediate Release May 2, 2013—Frederick, MD As part of the recently proposed Tier 3 motor vehicle fuel and emission regulations, EPA had included a very forward looking idea that could bring **higher octane, higher ethanol (E-30) gasoline** to the marketplace. Advanced Biofuels USA fully supports this idea and will be presenting comments with recommendations on its implementation.

"This should not be an issue that splits the biofuels community, as some have suggested," reports Joanne Ivancic, Advanced Biofuels USA executive director. "If done right, the EPA has proposed a way to achieve greatest efficiencies, lowest CO2 emissions, most effective transition to renewable transportation fuels and substantial health and environmental benefits. With the minimal 'tweaks' that we propose, this should provide a practical, rational, effective pathway to 'greening' our mobility."

"We are particularly concerned that the responsibility for assuring the availability of "higher octane, higher ethanol content" fuel rests with vehicle manufacturers who do not manufacture or sell the fuel," continued Ivancic. She suggested that it would be more practical for EPA to collect data about when higher octane fuels are needed to power next generation fuel efficient vehicles; and to require the availability of these fuels, following the example of the transition from leaded to unleaded gasoline.

In addition, Advanced Biofuels USA recommends flexibility in the range of renewable, negative GHG (as compared to petroleum) octane additives that could be substituted for 30% ethanol. This flexibility would promote competition in the biofuel marketplace that would result in the most sustainable low GHG solutions possible.

In response to EPA's request for comments on this idea, which is included in the following section of the proposed regulations;

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 79, 80, 85, 86, 600, 1036, 1037, 1065, and 1066

RIN 2060-AQ86

Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards

1. Part IV. Proposed Vehicle Emissions Program
 - D. Emissions Test Fuel
 1. Proposed Changes to Gasoline Emissions Test Fuel

Advanced Biofuels USA, would like to offer the following comments and recommendations for implementation.

- Advance Biofuels USA fully supports EPA's recognition of the importance of **higher octane, higher ethanol (E-30) gasoline** as a cost-effective way to allow manufactures to maximize the efficiency of smaller, more efficient engines that utilize high combustion pressures to meet 2022 EPA CO₂ vehicle emission standards.

- However, to provide a smooth path to making this “higher octane, higher ethanol content gasoline” available nationwide EPA should use their authority under section 211 of the Clean Air Act to implement the commercial availability of “higher octane, higher ethanol content gasoline.”
- This approach would be much more straightforward than the proposed idea of requiring individual vehicle manufacturers to: 1) petitions to EPA for its use as a certification testing fuel, and 2) to certify the availability of the “higher octane, higher ethanol content gasoline” even though they do not manufacturer fuel.
- By establishing a reasonable commercial implementation strategy for the nationwide availability of an E-30 type “higher octane, higher ethanol content gasoline” EPA would send a clear signal of ***Demand Certainty*** to markets and fuel providers.
- This clear signal will provide the currently missing certainty to the financial markets that will be needed to provide the capital for total-biomass ethanol and other advanced biofuel plants that will be needed to provide the “higher octane, higher ethanol content.” This clear market signal would be the most effective way to, *“provide a market incentive to increase ethanol use beyond E10 and enhance the environmental performance of ethanol as a transportation fuel by using it to enable more fuel efficient engines.*
- 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.
- EPA should also provide flexibility in the range of renewable, negative GHG (as compared to petroleum) octane additives that could be substituted for 30% ethanol. In order to qualify, these additives would have to meet the applicable EPA regulations for fuel composition and certification testing. This flexibility would promote competition in the biofuel marketplace that would result in the most sustainable low GHG solutions possible.

Advanced Biofuels USA strongly urges all supporters of increasing the US market for ethanol and other advanced biofuels to address their support and recommendations via comments to these regulations. The deadline for Tier 3 comments is June 13, 2013. For more information, the EPA website is www.epa.gov/otaq/tier3.htm.

See: <http://advancedbiofuelsusa.info/advanced-biofuels-usa-supports-proposed-tier-3-higher-octane-vehicle-fuel-and-emissions-regulations-with-recommendations-for-implementation>