

## Focus on Fuels

### In This Issue

#### TM&C Services

#### EPA Finally Finalizes the 2013 Renewable Fuel Standard



**Charlie Miller, P.E.**  
**Vice President**

### TM&C Services in Fuel Regulations

TM&C provides a full range of services in its fuels regulatory practice. Some of these services are listed below:

- Preparing, reviewing and submitting fuels reports, including CDX submissions.
- Facility audits for

September 2013

Volume 3, Issue 9

You are aware that the EPA's proposed Tier 3 gasoline regulations for reducing gasoline sulfur to an average of 10 ppm are designed to help the automotive manufacturers meet more stringent emissions regulations by reducing sulfur poisoning of new catalyst systems, and to make current systems more efficient. But did you know that the Tier 3 regulations also address changes to non gasoline ethanol blends? A non gasoline is any ethanol blend with an ethanol concentration greater than 15%.

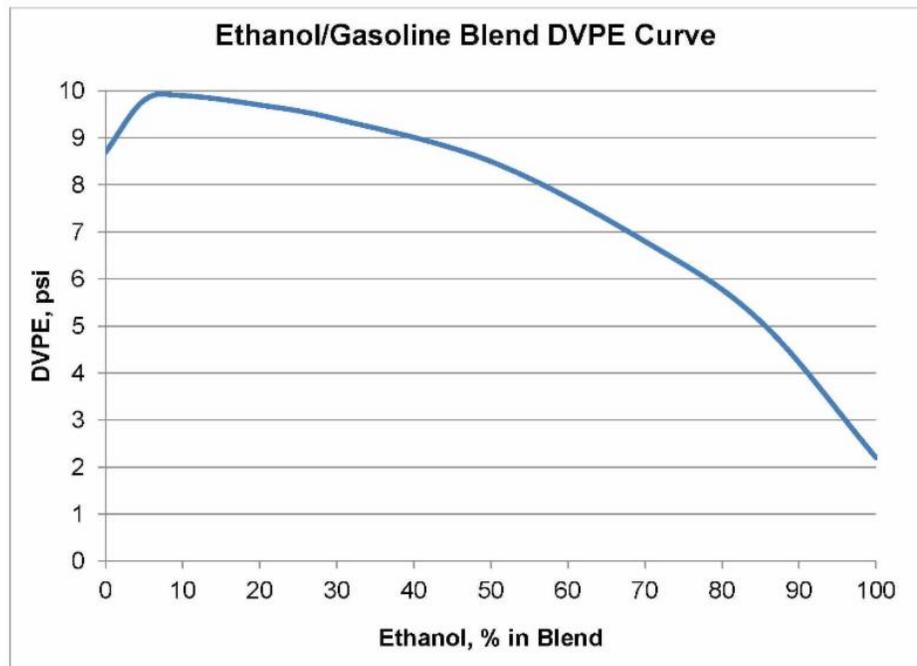
### The Ethanol Push

*by Charlie Miller*

E85 isn't really E85. Because of volatility requirements, E85 contains from about 68% to 83% ethanol. As shown in the chart, the problem with high-percentage ethanol blends is that ethanol does not have good front-end volatility. In the 2011 update to D 5798, Standard Specification for Ethanol Fuel Blends for Flexible-Fuel Automotive Spark-Ignition Engines, ASTM reduced the minimum limit of fuel ethanol in E85 to as low as 51% to allow the blending of additional CBOB or RBOB to increase fuel volatility.

compliance with fuels programs.

- Interaction with EPA to pose fuels related questions.
- Industry specialist assistance for required gasoline attestations.
- Industry specialist assistance for in-line blending audits.
- Assistance in setting up a fuels compliance group/program.
- Personnel reviews of compliance related groups.
- Compliance status reviews and recommendations
- Negotiations/consultation during EPA enforcement actions.
- 3rd Party Engineering reviews.
- Due diligence reviews of facilities and companies in RFS RINs Program.



EPA needs to increase the amount of ethanol in E85. Without robust sales of E85 with lots of ethanol in it, the U.S. will have a difficult time meeting the biofuels consumption requirements of the Renewable Fuel Standard Phase 2 (RFS2). To get more ethanol into E85, the EPA is proposing to allow the blending of butane and natural gasoline, besides a BOB, to increase the front-end volatility and reduce the cost of production. The E85 containing the new blendstocks would have to meet "the same sulfur, RVP, and benzene standards that are otherwise applicable to gasoline as well as the substantially similar requirements."

Having the E85 meet the gasoline standards does create sampling and testing issues. E85 is normally blended at the truck rack, but meeting the gasoline requirements imposes the sampling, testing and reporting obligations that refiners face - every batch must be tested. That would be prohibitively expensive if each truck load must be considered a batch. Thus, EPA is working on a way to ease those obligations by limiting E85 blendstocks to those (including butane and natural gasoline) that meet the benzene and sulfur requirements for gasoline.

EPA is also trying to figure out how to treat the RVP of E16 to E50 blends that could also be alternative fuel for Flex Fuel Vehicles. The agency is intimating that it might be reasonable to allow a waiver for the vapor pressure of blends in that range. For a 30% ethanol blend, the vapor pressure kick is about 0.5 psi.

But, no matter what the blend concentration, the push to get people to burn high concentration ethanol blends in their Flex Fuel Vehicles will displace more petroleum out of the fuel system.

Dallas, TX 75201

Phone: 214-754-0898

Fax: 214-754-5915

[www.turnermason.com](http://www.turnermason.com)