

## Focus on Fuels

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>From time to time, we review interesting articles related to the fuels regulations. Today we comment on "It's Final - Corn Ethanol is of No Use," an article written by James Conca for the April 20, 2014 issue of Forbes magazine. We hit some of the highlights from the article here, but we recommend that you read it in total if you get a chance.

### Forbes Article "It's Final-Corn Ethanol is of No Use"

by Tom Hogan

Highlights from James Conca's brief bio include, *"... a scientist in the field of the earth and environmental sciences for 33 years, ... For over 20 years I have been a member of Sierra Club, Greenpeace, the NRDC, the Environmental Defense Fund and many others, as well as professional societies including the America Nuclear Society, the American Chemical Society and the American Association of Petroleum Geologists".*

### 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 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

The article points out that biofuels can result in little or no environmental benefit. Reductions in greenhouse gases (GHG) from the use of biofuels can be offset by greater total emissions due to indirect emissions like those related to land use. Conca's article cites references from the Intergovernmental Panel on Climate Change, the Scientific American and the International Institute for Sustainable Development (IISD) that question (or categorically deny) whether biofuels have any positive environmental impacts. The IISD claims that it would be almost 100 times more effective, and much less costly, to significantly reduce vehicle emissions by increasing the CAFE standards.

The article also touches on the food versus fuel debate. In 2013, about 40% of the U.S. corn crop went to produce fuel grade ethanol. The U.S. produces about 40% of the world corn supply. 70% of all corn imports come from the U.S. If all of the corn produced in the U.S. were used in the production of fuel grade ethanol, it would only displace 25% of the current U.S. gasoline demand. The article indicates that the grain required to fill a 25-gallon tank with ethanol would feed a person for a

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.

year.

Conca points out that the public discussion on the wisdom of the use of biofuels has changed dramatically. In December 2013, Senators Feinstein (D-CA) and Coburn (R-OK) (two divergent political philosophies) introduced a bill that would eliminate the ethanol mandate required by the Renewable Fuel Program.

Where does TM&C see biofuels headed in the U.S.? The future for biofuels in the U.S. is still an unknown, primarily because their increased use is a political question. At a minimum, it is likely that ethanol blended into gasoline will continue to be 10 volume percent. It is also likely that cellulosic ethanol will continue to be an unattainable, economic Holy Grail for biofuel producers. Regulators in the EPA will continue to struggle with the moral dilemma of less food (perhaps no environmental benefits) offset by a desire by elected officials to curry political favor by increasing the use of biofuels. An example of this struggle within the EPA is that certain favorable treatment of gasoline with 10% ethanol (a 1 psi RVP waiver) has not been extended to gasoline with more than 10% ethanol. This is in spite of the fact that higher ethanol content in this range generally does not change the RVP of the mixture any more than a 10% blend.

TM&C has actively consulted in the fuels regulatory area for over 20 years. Please contact us for questions or services related to fuels regulations, including technical experts in fuel-related attestations, reporting, setting up internal resources for fuels compliance, etc.

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