

The Low Carbon Synthetic Fuels Association (LCSFA)

Fact Sheet

What is the LCSFA?

The LCSFA represents technology providers, project developers, and downstream users that encompass the whole value chain of the biomass-to-liquids (“BtL”) synthetic fuel industry.

LCSFA members include TRI, Rentech Inc., Velocys, CHOREN, Flambeau River Biofuels/Johnson Timber, and AP Fuels.

Why is BtL the best option for renewable fuels?

In addition to extremely low lifecycle GHG emissions, BtL fuels:

- exhibit far lower conventional pollutant emission profiles than current options (EPA estimates increases in conventional and toxic air pollutants as a result of increased ethanol consumption), *see note below on air quality
- are compatible with the existing fuels infrastructure,
- enhance the performance of engines (won’t corrode or cause equipment to fail),
- can help EPA meet renewable fuel mandates, and
- contribute to energy security.

How are BtL fuels produced?

BtL is produced through the gasification of renewable woody biomass which is then synthesized through the Fischer-Tropsch (“F-T”) process to produce a variety of downstream products, including diesel and jet fuel.

What is LCSFA’s position?

The EPA needs to develop a robust renewable fuels (RFS2) program that recognizes the unique and differentiated benefits of BtL fuels, maintains strong goals and clear timetables, and includes strong incentives for early entrants into the industry, as early facilities will lack economies of scale. Renewable fuel options that reduce GHG emissions, improve air quality, work within the existing infrastructure and protect existing consumer vehicles and equipment should be supported and incentivized.

Who supports the LCSFA?

Auburn University
Audi America
Chemrec AB
Mercedes Benz USA
Pacific Renewable Fuels
Renewable Energy Institute International
Volkswagen

****Air Quality and Renewable Fuels**

The LCSFA is concerned that EPA's air quality impacts analysis could be misinterpreted by policy officials and others who might wrongly conclude that *all* renewable fuels negatively impact air quality. This is not the case for BtL fuels, which are far cleaner than both other renewable fuels and the petroleum fuels they would displace. As a result, use of BtL fuels would improve air quality nationwide, and, in particular, in non-attainment areas. We would like to partner with EPA to avoid such a misperception and ensure that information is presented in an accurate and clear manner. To that end, for the final rulemaking, we request that EPA conduct an alternate analysis of the nationwide and local air quality impacts (or improvements) that would result from the use of BtL fuels to meet the 16 billion gallon cellulosic biofuel standard (which would require roughly 9.4 gallons of BTL at a 1.7 equivalence value). Indeed, EISA Section 209 requires that EPA consider in its study of air quality impacts "different blend levels,

types of renewable fuels, and available vehicle technologies.” We are confident that EPA will conclude that significant air quality benefits will result, and we believe that EPA should develop accurate and objective evaluations of the air quality impacts of various renewable fuels that could be used to meet EISA mandates.