

U.S. Environmental Protection Agency Proposed Biomass Based Diesel Volume: Petroleum Marketers Association of America Comments



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The Petroleum Marketers Association of America (“PMAA”) submitted August 17th comments on the United States Environmental Protection Agency (“EPA”) proposed calendar year 2019 volumetric blending metric mandates for cellulosic biofuels, advanced biofuel and total renewable fuels. See Docket ID No.: EPA-HQ-OAR-2018-0167. Renewable Fuels Standard Program: Standards for 2019 and Biomass Based Diesel Volume for 2020.

The mandates are required under the federal renewable fuel standards program.

PMAA describes itself as a national federation of 47 state and regional trade associations collectively representing 8,000 independent petroleum marketing companies nationwide. The companies that are members of such state and regional trade associations store and dispense a variety of finished liquid fuels, including gasoline, diesel fuel, biodiesel, E85, jet fuel, racing fuel, marine and locomotive fuel and heating oil.

The Arkansas Oil Marketers Association is a state member of PMAA.

PMAA’s comments initially note the organization’s support for renewable fuels and their importance in eliminating the United States dependence on foreign oil. Nevertheless, PMAA states its belief that the volumetric ethanol mandate:

... should be limited to no more than 9.7% of projected gasoline demand as determined by the Energy Information Administration ...

The organization further states that:

... adopting annual volumetric metric mandates that produce more ethanol blended gasoline than the marketplace demands and that RIN credits can no longer offset, is forcing higher ethanol blends under reluctant marketplace and artificially inflating the value of RIN credit.

Further concerns include:

- If obligated blending volumes are not tied to actual demand the current blend-wall will be breached and E15 will replace E10 blended gasoline; and,
- E15 blended gasoline is not compatible with the majority of underground storage tanks
- systems components currently in operation at the majority of retail gasoline stations nationwide.

PMAA asks EPA to lower the corn-based ethanol mandate to approximately 9.7% projected gasoline demand. Further, it supports the Federal agency's use of waivers to reduce cellulosic blending mandates and in turn, lower the obligated volumes for advanced biofuel and total renewal fuel.

A copy of the [PMAA comments](#) can be downloaded below.