

Message

From: Bob Casper [bobcasper@poetep.com]
Sent: 7/17/2018 4:28:07 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Sahay, Shailesh [Shailesh.Sahay@POET.COM]; Walther, Robert [Robert.Walther@POET.COM]
Subject: Meeting on Friday
Attachments: EPA Letter Sent 07_17_2018 Full Waiver.docx

Bill,

I look forward to our meeting on Friday.

To make best use of our time, I would propose we cover only a few of the items below.

Doing so should give us time to comprehensively review each subject.

From Poet's perspective we would like to focus on the following:

1. Full E15 CAA Waiver (Word doc. attached).
2. Win:Win E15 RVP and RIN reform.
3. Poet's cellulosic pathway approval.

Please let me know if there are any items you would like us to address that are not covered above.

Thank you,

Bobc

From: Bob Casper
Sent: Wednesday, June 20, 2018 11:03 AM
To: Wehrum, Bill <Wehrum.Bill@epa.gov>
Subject: RE: RFS Follow Up

Bill,

In our March 9th meeting, you asked me for ideas on how to help identify and resolve excessive and burdensome regulations.

I am sorry this response took so long, for I was waiting on the E15 RVP resolution.

With uncertainty around that timing, I decided not to wait any longer and send you our thoughts below.

Please note that we can provide more detailed information regarding the regulation and law in any of these areas.

Constraining E15 Regulations

1. **Full E15 Waiver** – The current partial waiver for E15 use in 2001 and newer vehicles should be expanded to include all vehicles. Over 90% of cars on the road today meet this requirement. This change would eliminate or significantly reduce the following regulatory burden for E15:
 - a. **Dispenser Labeling** – The EPA's labeling requirements for E15 could be eliminated or modified for other non-automotive use.
 - b. **Fuel Survey Sampling Plan** – The fuel survey sampling plan imposed on stations selling E15 as part of the Mis-fueling Mitigation Plan is costly, onerous and would be unnecessary with a full E15 waiver.
2. **Underground Storage Tank Systems** – The EPA requirements for fuel dispensing systems are more stringent for fuels above 10% ethanol than below. This limit needs to be moved up to 15% for equal treatment of E10 and E15.

Ethanol Regulation Deficiencies

3. **Emissions Modeling** – A number of items within the MOVES model need to be revised to more accurately reflect the favorable attributes of ethanol blended fuels.
4. **Flex Fuel Vehicle Incentives** – EPA should update R-Factor calculations and provide long-term F-Factor guidance to automakers. These simple administrative actions would remove regulatory uncertainty and restore reliable CAFE compliance value to automakers for flex-fuel vehicles.
5. **Greenhouse Gas Scoring** – The lifecycle greenhouse gas scoring calculations need to be revised to reflect the latest research from USDA and Argonne National Laboratory showing significant improvements in GHG score for ethanol blends.

Other Regulation Considerations

6. **Proposed REGS Rule**
 - a. **DFE as Blend Component** – assuming approval by Authority Having Jurisdiction (e.g. fire marshal), denatured fuel ethanol should be allowed as a blending component for E15 as well as other higher level ethanol blends.
 - b. **Regulations for Ethanol Flex Fuel** – There are a number of elements in the regulation for Ethanol Flex Fuel (E16-E85) that are problematic including natural gasoline sulfur and benzene limits, limitation on maximum amount of natural gasoline in EFF, and product transfer documentation.
 - c. **Regulatory Treatment of E16-E50** – The current treatment of E16-E50 as gasoline should be eliminated and this blend range should be treated as flexible fuel as proposed by the EPA in the REGS rule.
7. **Bio-Intermediates** – Poet supports the ability to partially process renewable feedstock at one facility and further process or denature at another facility.
8. **Carbon Capture/Sequestration** – POET Ethanol Products supports the ability to generate lifecycle GHG credit using CO2 from ethanol plants if it displaces CO2 removed from geologic reservoirs.

I will give you a call to discuss these items and how we may be of assistance.

Thank you,

Bob Casper
POET Ethanol Products

Direct: Ex. 6

Cell: Ex. 6

-----Original Message-----

From: Wehrum, Bill <Wehrum.Bill@epa.gov>

Sent: Monday, March 12, 2018 6:20 AM

To: Bob Casper <bobcasper@poetep.com>

Subject: RFS Follow Up

Hi Bob. It was nice to meet you on Friday at the RFS meeting. My contact info is listed below. Feel free to contact me if you need anything.

Bill Wehrum
Assistant Administrator

Office of Air and Radiation
U.S. Environmental Protection Agency
(202) 564-7404

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