

## Renewable Fuels Association Responses on Boutique Fuels

1. EPA's 2001 study analyzed four different scenarios for reducing the number of boutique fuels. Do you agree with these options? Are there other options that should be addressed?

*I agree the 2001 options are the appropriate options to evaluate.*

2. Given the current state of fuel requirements, are the 2001 study findings regarding the cost, fungibility, air quality and supply of the four options still accurate?

*Yes.*

3. What data would be needed to complete additional analysis on these four factors for boutique fuel options?

*I believe EPA has the data needed to re-evaluate the four fuel options based on the criteria cited.*

4. Would a menu of fuels be a helpful alternative to the current SIP approval process? Should the menu also require some sort of EPA SIP approval process, or should a state be able to simply choose the fuel they want within the applicable PADD?

*Passage of the Energy Policy Act of 2005 and the attendant elimination of the federal RFG oxygen content requirement should encourage states to choose federal RFG rather than boutique sub-RVP fuels when evaluating clean burning fuel programs. Thus, a "menu" of fuels is not necessary, nor particularly helpful. EPA should be working with states to encourage the adoption of federal RFG, including using its approval authority in the SIP process. There is no reason why federal RFG and conventional gasoline could not be the two fuels used in 49 states, with California allowed to maintain its existing CBG program.*

5. Are decisions to produce certain RVP-level gasoline based on distribution constraints? If so, what are these constraints?

*Gasoline distribution is not within my area of expertise.*