To: Jonathan [(b) (6) [redacted] Argyropoulos, Paul[Argyropoulos [(b) (6) [redacted]
From: Bittleman, Sarah
Sent: Thur 7/18/2013 4:16:24 PM
Subject: RE: EPA's air office contact

Paul Argyropoulos is always a good place to start

From: Jonathan Birdsong [mailto:[(b) (6) [redacted]
Sent: Thursday, July 18, 2013 10:55 AM
To: Bittleman, Sarah
Subject: EPA's air office contact

Sarah -

I have some questions for the EPA air office re: municipal solid waste. Who in that office would you recommend I contact?

Thanks,

Jonathan

To: Argyropoulos, Paul[Argyropoulos.(b) (6)
From: (b) (6)
Sent: Wed 7/17/2013 8:15:46 PM
Subject: Re: John will send you a number ---------- what's your address again for the meeting? Karl and I can only stay until 10:40.....need to the head to a meeting with OMB

Thanks for getting back to me. Nailing down last minute pieces.

Sent using BlackBerry

From: Argyropoulos, Paul [mailto:(b) (6)
Sent: Wednesday, July 17, 2013 04:11 PM Eastern Standard Time
To: McAdams, Michael J (WAS - X75140)
Subject: John will send you a number ---------- what's your address again for the meeting? Karl and I can only stay until 10:40.....need to the head to a meeting with OMB

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6)

Email: (b) (6)

Web: www.epa.gov

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To: Argyropoulos, Paul[(b) (6)
From: Michael.McAda(b) (6)
Sent: Mon 7/15/2013 3:56:44 PM
Subject: FW: Ashland/Valvoline Meeting Request July 23rd

Paul: This is my wife's client. Do you have any idea who might be interested talking about this at EPA? It's about GHG reduction, but I would not think this is in your shop. Thanks.

Michael McAdams | **Holland & Knight**
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone 202.469.5140 | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

Add to address book | View professional biography

From: Viola, Beth (WAS - X77030)
Sent: Tuesday, July 09, 2013 6:28 PM
To: 'argyropoulos,(b) (6)
Cc: McAdams, Michael J (WAS - X75140)
Subject: Ashland/Valvoline Meeting Request July 23rd

Hi Paul:

Representatives from Ashland will be in Washington on Tuesday July 23rd and would welcome an opportunity to meet with you. They would like to discuss re-refined motor oil use in the federal fleet in conjunction with Executive Order 13423. Ashland's Valvoline unit has a recycled motor oil that would help meet the goals of the EO, and result in 50% less emissions and results in 58% less resource depletion. I've attached a basic overview below.

Participants would include:

John Riley, Director of Govt Relationships at Ashland

Sarita Soldz, VP of Marketing and Product Development

John Noal, VP Valvoline's International and Commercial Business

Heather Watson, Fleet Marketing Manager, Valvoline

Rich Gold and/or Beth Viola, Holland & Knight

Please let me know if your schedule will allow for a meeting the afternoon of July 23rd to discuss.

Many thanks!

Beth

Beth Viola | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Mobile (b) (6) [redacted]
beth.viola@hklaw.com | www.hklaw.com

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RE-REFINED MOTOR OIL USE IN FEDERAL MOTOR VEHICLES

Objective

The federal government continues to lag well behind recycling goals despite agencies being directed to use products with recycled content. Using re-refined motor oil would enable federal fleets to achieve the recycling directive established by EO 13423 and contribute to a cleaner environment by reducing related emissions by 50%. We request your assistance to communicate and enforce the requirement to use re-refined motor oil throughout the federal motor vehicle fleet.

Summary

Executive Order 13423 requires federal agencies to purchase vehicular products and services made with recycled content, and using sustainable environmental practices. There are products available on the market today made with 50% or higher re-refined base oil stock. But while there are products and service providers approved for government agencies such as GSA, USDA and USPS, compliance with EO 13423 is very limited.

Environmental Benefits

There are significant environmental benefits in the production and vehicular use of re-refined motor oil. It lowers emissions during processing, conserves valuable natural resources by saving oil, and helps ensure used oil stays out of our water supply. Compared to the production of the virgin base oils used in regular motor oil, the production of the base oils in certain re-refined motor oil:

- Results in up to 58% less resource depletion
- Emission levels 50% less harmful into the air
- Significantly less climate impact

Source: Used Oil Re-refining Study to Address Energy Policy Act of 2005 Section 1838, US Department of Energy, Office of Fossil Energy. Commissioned by GEIR – Group European Industry Regeneration.

Endorsements from Green Organizations

The EPA has approved and listed products with re-refined oil on their CPG Product Supplier Directory under the category of Vehicular Products made with the appropriate recycled content (www.epa.gov). National publications and organizations that promote sustainable practices such as *EcoFriendly Magazine, Go Green Post, Earth Garage and USA Today*™ have made public endorsements of these re-refined motor oil products.

Availability

There are over 900 retail outlets with instant oil change capabilities currently doing business in 42 states. These outlets offer oil changes and preventive maintenance for light duty passenger vehicles with discounted prices available to the federal government. Bulk re-refined oil delivery is available in 50 states and Puerto Rico for on-highway and off-highway vehicles in Class 3-8 applications.

Beth Viola | Holland & Knight
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Mobile (b) (6) [redacted]
beth.viola@hklaw.com | www.hklaw.com

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To: Argyropoulos, Paul (b) (6) [redacted]
From: (b) (6) [redacted]
Sent: Mon 7/15/2013 3:27:30 PM
Subject: RE: Quick Question

Let me talk with Tom. I remember it was 28% 0xygen, and had a good bit of water as well. I believe the overall BTU was around 75,000. I will get back with you after I call Tom.

Michael McAdams | **Holland & Knight**
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax 202.955.5564
michael.mcadams@hklaw.com | www.hklaw.com

Add to address book | View professional biography

From: Argyropoulos, Paul [mailto:Argyropoulos (b) (6) [redacted]
Sent: Monday, July 15, 2013 11:24 AM
To: McAdams, Michael J (WAS - X75140)
Subject: Quick Question

Do you know the percent solids in the Ensyn RFO product? And / or the spec sheet on the fuel?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: (b) (6) [redacted]

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

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To: Argyropoulos, Paul[redacted]
Cc: [redacted]
From: [redacted]
Sent: Tue 7/9/2013 10:27:50 PM
Subject: Ashland/Valvoline Meeting Request July 23rd

Hi Paul:

Representatives from Ashland will be in Washington on Tuesday July 23rd and would welcome an opportunity to meet with you. They would like to discuss re-refined motor oil use in the federal fleet in conjunction with Executive Order 13423. Ashland's Valvoline unit has a recycled motor oil that would help meet the goals of the EO, and result in 50% less emissions and results in 58% less resource depletion. I've attached a basic overview below.

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Sarita Soldz, VP of Marketing and Product Development

John Noal, VP Valvoline's International and Commercial Business

Heather Watson, Fleet Marketing Manager, Valvoline

Rich Gold and/or Beth Viola, Holland & Knight

Please let me know if your schedule will allow for a meeting the afternoon of July 23rd to discuss.

Many thanks!

Beth

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There are significant environmental benefits in the production and vehicular use of re-refined motor oil. It lowers emissions during processing, conserves valuable natural resources by saving oil, and helps ensure used oil stays out of our water supply. Compared to the production of the virgin base oils used in regular motor oil, the production of the base oils in certain re-refined motor oil:

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Source: Used Oil Re-refining Study to Address Energy Policy Act of 2005 Section 1838, US Department of Energy, Office of Fossil Energy. Commissioned by GEIR – Group European Industry Regeneration.

Endorsements from Green Organizations

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-

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800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Mobile (b) (6) [redacted]
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To: Argyropoulos, Paul[Argyropoulos (b) (6) [redacted]
From: (b) (6) [redacted]
Sent: Tue 7/9/2013 4:25:54 PM

Paul: Hope you had a good vacation. I am in board meeting mode and closing all the loops. Are you and Karl ok for 10:00 on the 18th? Thanks. Say 45 minutes. Mostly q and a. Ps, I am meeting with House Energy tomorrow, understand they are looking at a hearing the week of the 22nd of July for industry. Senate looking at September I am told.

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax (b) (6) [redacted]
[redacted].com

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To: Argyropoulos, Paul[redacted]
Cc: Matthew Carr[redacted]
From: Erick Lutt
Sent: Mon 7/1/2013 9:17:59 PM
Subject: FW: Docket ID No. EPA-HQ-OAR-2011-0135 - BIO IES Comments - EPA's proposed Tier 3 Rule
BIO IES - Tier 3 CommentsFinal Draft 070113.pdf

Hi Paul,

We just sent in our comments regarding EPA's proposed rule on Tier 3 through the official docket email, but we wanted to make sure you received a copy to ensure its receipt at the Agency.

Please let us know if you have any questions.

All the best,

Erick

Erick Lutt

Director, Industrial & Environmental Section

Biotechnology Industry Organization

Direct: [redacted] /Mobile: [redacted]

[redacted]

From: Erick Lutt
Sent: Monday, July 01, 2013 5:14 PM
To: [redacted]
Cc: Brent Erickson; Matthew Carr; Erick Lutt
Subject: Docket ID No. EPA-HQ-OAR-2011-0135 - BIO IES Comments - EPA's proposed Tier 3 Rule

Attached, please find the Biotechnology Industry Organization's "BIO" comments on the U.S. Environmental Protection Agency's Proposed Rule on "Control of Air Pollution From Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards," Docket ID No. EPA-HQ-OAR-2011-0135.

Please feel free to contact us if you have any questions or follow up regarding our comments.

Thank you for your consideration.

Erick Lutt

Director, Industrial & Environmental Section

Biotechnology Industry Organization

Direct: (b) (6) Mobile: (b) (6)

(b) (6)

Biotechnology Industry Organization

July 1, 2013

Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Via email at A-and-R-Docket@epamail.epa.gov

Docket ID No. EPA-HQ-OAR-2011-0135: Control of Air Pollution From Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards

The Biotechnology Industry Organization ("BIO") is pleased to comment on the U.S. Environmental Protection Agency's ("EPA") Proposed Rule on "Control of Air Pollution From Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards" ("the proposed rule").[1]

I. Introduction

BIO is the world's largest biotechnology organization, with more than 1,100 member companies worldwide. BIO represents leading technology companies in the production of conventional and advanced biofuels and other sustainable solutions to energy and climate change. BIO also represents the leaders in developing new crop technologies for food, feed, fiber, and fuel.

These companies are developing new and innovative ways to help fuel America and the world; providing more environmentally friendly energy crops, cleaner burning biofuels and renewable chemicals that help reduce greenhouse gas emissions and provide more sustainable sources of energy and materials. Achieving our nation's goals of less dependence of foreign sources of oil and cleaner fuels will require our economy to transition to sustainable energy resources and higher levels of energy efficiency. The companies BIO represents are developing innovative biobased fuels, products, and processes that will enable our economy to achieve these objectives.

[1] Environmental Protection Agency, Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards, 78 Fed. Reg. 29,816 (proposed May 21, 2013) (to be codified at 40 CFR Pts. 79, 80, 85, 86, 600, 1036, 1037, 1065 and 1066), available at https://www.federalregister.gov/articles/2013/05/21/2013-08500/control-of-air-pollution-from-motor-vehicles-tier-3-motor-vehicle-emission-and-fuel-standards) [Hereinafter "The Proposed Rule"].

1201 Maryland Avenue SW
Suite 900
Washington DC 20024

202.962.9200 p
202.488.6301 f
bio.org

Toward this end, federal policy and regulations—including the proposed rule as well as the federal Renewable Fuel Standard (RFS) and EPA's consistent support and implementation of that policy—play an important role in helping to drive the commercialization of these technologies. The importance of federal policy is particularly critical in the transportation fuel sector. The U.S. transportation system is overwhelmingly and unsustainably reliant on petroleum fuels. These traditional fuels are a large component of the U.S. greenhouse gas (GHG) emissions inventory and our overdependence on foreign sources of energy. Rapid transition to more alternative transportation fuels is essential to reducing GHG emissions and reducing U.S. reliance on foreign sources of energy.

BIO commends EPA on the proposed rule and the Agency's work to take a "systems approach to addressing the impacts of motor vehicles and fuels on air quality and public health."[2] EPA clearly recognizes that the most effective and efficient way to achieve these important goals of the proposed rule is to work to harmonize it with other policies affecting and regulating the transportation fuel sector throughout the country, including the RFS, Corporate Average Fuel Economy Standards (CAFE), and California's Low Emission Vehicle Program.[3] BIO supports the proposed rule and believes that the final Tier 3 rule has the potential to encourage the continued development and commercialization of all biofuels.

Below, BIO provides context for our comments on specific provisions in the proposed rule by first briefly discussing the rapid growth and attributes of the renewable fuels industry to the U.S. fuel supply, and the importance of these other policies, particularly the RFS, to the development and commercialization of the industry. Following this discussion, BIO comments on specific elements of the proposed rule that could promote the continued development and use of biofuels—which are inherently low in sulfur content and by statute must have reduced GHGs over traditional fuel.

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[2] *Id.* at 29816.
[3] *Id.* at 29825.

II. Biofuels and Their Supportive Policies Are Important to the U.S. Fuel Supply

The federal RFS, enacted in 2005 and updated in 2007, is an important tool in achieving the objectives of energy independence and pollution reduction. The RFS is the single most important federal policy driving investment and commercialization of conventional and advanced biofuels. Biofuel production under the RFS has already displaced nearly 10 percent of gasoline consumption and will account for more than 20 percent of U.S. transportation fuel by 2022. Biofuel production under the RFS reduced the need for imported oil by more than 462 million barrels in 2012.

Investment in biofuels, largely spurred by the RFS, has led to the development of facilities like INEOS Bio's in Vero Beach, Florida, and KiOR's in Columbus, Mississippi, which represent several hundred million dollars of investment in the United States and are poised to begin production of the next generation of renewable fuel from non-food feedstocks this year. Dozens more advanced biofuel projects are planned or under construction, as highlighted in the attached Appendix I, illustrating the visible success the RFS has had in driving development of highly skilled, well-paying jobs in rural America. Biofuel production under the RFS has led to the employment of 380,000 Americans. And, 800,000 employment opportunities could be created by 2022.[4]

III. The "Blend Wall"

BIO firmly believes that the limits to market access for biofuels commonly referred to collectively as the "blend wall" represent a series of barriers contrived by obligated parties[5] to prevent biofuels from gaining access to the marketplace.[6] Multiple avenues exist for

---

[4] Bio Economic Research Associates, "U.S. Economic Impact of Advanced Biofuels Production: Perspectives to 2030." Washington, DC: February 2009.

[5] *'Big oil' may block branded retail blender pumps: Green Plains* http://www.platts.com/RSSFeedDetailedNews/RSSFeed/Oil/8102457

[6] *Fill Up With Ethanol? One Obstacle is Big Oil,* http://online.wsj.com/article/SB117547886199856472.html

blending additional volumes of biofuel into the nation's fuel supply. For instance, as the proposed rule recognizes, E15 blends are approved and ready for use, and production of flex fuel vehicles continues to increase. These options, combined with the introduction of new "drop-in" fuel molecules, provide a suite of opportunities for the growth of the entire biofuels industry and RFS compliance.

The main obstacle to this growth and compliance is the dilatory tactics of obligated parties to pursue the options available to them.[7] Obligated parties have had over five years to begin establishing the infrastructure necessary to distribute RFS-mandated biofuel volumes, but have taken few steps to do so. EPA should therefore resist all efforts by obligated parties to postpone updating the U.S. certification fuel for emissions from light duty cars and trucks and heavy duty gasoline vehicles, or to reduce RFS obligations based on blend wall claims. Any concession by EPA to accommodate these assertions regarding the blend wall will only serve to embolden obligated parties in their effort to resist compliance with the Clean Air Act.

Instead, as it is able through the proposed rule and other administrative actions, the Agency should encourage the development of biofuels – and the engines and infrastructure to support them. This development can readily grow the supply of biofuels in the market and overcome the blend wall by allowing Renewable Identification Numbers (RINs) to truly reflect their market value. It will also help drive the market and encourage retailers to adopt new infrastructure as reflected in Appendix I.

EPA should also seek to identify opportunities to grow biofuel markets, including for drop-in biofuels. Reconsideration of the gasoline base fuel would enable engine manufacturers to optimize beneficial characteristics of biofuels in engine design, while

---

[7] *Trade group requests U.S. probe of oil industry's efforts to impede renewable fuels.* http://eenews.net/eenewspm/2013/03/19/archive/9?terms=RFA%2C+ConocoPhillips

expedited approval of new molecules would provide obligated parties with additional options for compliance not subject to blending limitations.[8]

IV. Comments and Suggestions on the Proposed Rule

BIO believes the final Tier 3 rule has the potential to continue the progress of the biofuels industry and help alleviate the "blend wall" as described above. BIO commends EPA's efforts to transition the certification test fuel for emissions from light duty cars and trucks and heavy duty gasoline vehicles ("the emissions test fuel") to better reflect the current and future in-use fuel as it begins to contain greater volumes of biofuels resulting from the continued development and commercialization of biofuels and increased RFS volumes in the market.

BIO believes that EPA should work to finalize its Tier 3 rulemaking and set the emissions test fuel to encourage further investment and adoption of biofuels, including advanced drop-in biofuels, ethanol and other fuel molecules. Encouraging biofuels, including higher blends of ethanol and drop-in biofuels would help meet EPA's overall goal in this rulemaking to address the impacts of motor vehicles and fuels on air quality and public health.[9] For instance, advanced drop-in biofuels have the same molecular make-up of traditional petroleum-based fuels, but they contain little or no sulfur and have significantly reduced GHGs. In addition, ethanol combusts without producing air toxics, which are the main source of particulate matter. Blending ethanol in gasoline also reduces the need for unhealthy detergent additives which are mandated to reduce the formation of engine deposits from gasoline that increase exhaust emissions and result in the loss of fuel economy and performance. These benefits of biofuels only rise with higher blends. BIO encourages EPA to issue a final rule that maximizes investment and adoption of all biofuels, including higher blends and drop-ins.

---

[8] http://www.afdc.energy.gov/fuels/emerging_dropin_biofuels.html
[9] The Proposed Rule at 29816.

a. Octane

BIO urges EPA against lowering octane as it allows for higher biofuel content in the emissions test fuel in order to further help meet its air quality and public health goals, as well as to help incentivize automakers and help them meet their CAFE requirements for model vehicles 2017 and beyond. Instead, BIO suggests EPA issue a final Tier 3 rule that maximizes investment in biofuels, while also encouraging the highest achievable level of octane in transportation fuel.

Ethanol and other alcohol fuels including butanol, for instance, have higher octane ratings than neat fuel. Higher octane enables higher compression and more efficient combustion engines.[10] It could actually boost fuel economy in future car models, according to a 2009 report by Sandia National Labs, if automakers concentrate on developing smaller engines with higher compression and turbocharging.[11] For this reason, encouraging higher octane could help incentivize automakers to make cars that run on cleaner fuel.

High octane blends including ethanol offer a means for auto manufacturers to meet higher mileage CAFE standards. In fact, during EPA's recent public hearing on Tier 3, Mercedes Benz publically announced its support for the Tier 3 proposed emissions test fuel and urged adoption of higher blends including E25.[12] And last year, the Alliance for Automobile manufacturers filed comments to EPA stressing the need to transition to higher blends.[13]

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[10] Formula 1 and IndyCar race cars use ethanol to achieve high performance.

[11] Next Generation Biofuels and Advanced Engines for Tomorrow's Transportation Needs. November 17 and 18, 2009, San Ramon, CA. http://digitalcommons.unl.edu/usdoepub/82/

[12] Testimony of Bill Woebkinberg, Mercedes Benz of North America, April 29, 2013 U.S. Environmental Protection Agency public hearing on Tier 3 proposed rule making.

[13] Alliance of Automobile Manufacturers, Comments on the Proposed Rulemaking to Establish Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for MY 2017-2025 (Submitted February 13, 2012), available at http://www.autoalliance.org/index.cfm?objectid=6CADFDC0-B980-11E1-9E4C000C296BA163

b. New Emissions Test Fuel

EPA requests comment on various ways to transition the emissions test fuel, including: starting with a transition to E10 with a transition to E15 as that fuel becomes more widely available on the market; transitioning to E15 after a few years to allow time for this greater market availability or by setting a date certain by which the transition should be made to help drive E15 market availability; or, allowing "vehicle manufacturers to request approval for an alternative certification fuel, such as a high-octane 30 percent ethanol by volume (E30) for vehicles they might design or optimize to use such a fuel" so that it may "help manufacturers that wish to raise compression ratios to improve vehicle efficiency, as a step towards complying with the 2017 and later light-duty greenhouse gas and CAFE standards."

As BIO describes above, we urge EPA to issue a final Tier 3 rule that maximizes investment and adoption of biofuels. We agree with EPA's assertion that E10 is widely available and in use in today's market, and that E15 and E85 are the most likely near term biofuels that have the potential to be widely available. We believe the final rule should allow for and encourage ongoing and greater use of E85 and E15, as well as the transition to higher blends of ethanol, and drop-in biofuels.

To this end, BIO urges EPA to issue a final rule that recognizes that new biofuel molecules are beginning to enter the market for blending with gasoline in order to help achieve the goals of the RFS. As such, we urge EPA to ensure that any transition in the certification fuel not create unintended barriers and burdensome costs to companies working to register these new biofuel molecules under Part 79 fuel and fuel additive registration.

As EPA suggests, one way to accomplish this goal may be to allow vehicle manufacturers to request approval for an alternative certification fuel such as a high-octane E30 blend for vehicles they might design or optimize for use on such a fuel. BIO is aligned with EPA's assertion in the proposed rule that "[t]his could help manufacturers that wish to raise

compression ratios to improve vehicle efficiency, as a step toward complying with the 2017 and later light-duty greenhouse gas and CAFE standards...[t]his in turn could help provide market incentive to increase ethanol use beyond E10 by overcoming the disincentive of lower fuel economy associated with increasing ethanol concentrations in fuel, and enhance the environmental performance of ethanol as a transportation fuel by using it to enable more fuel efficient engines."[14] Preliminary results from Oak Ridge National Laboratory and the University of Wisconsin suggest that moderate biofuel blends increase the benefits of the use of Reactivity Controlled Compression Ignition.[15] Therefore in order to further help manufacturers develop engines which can utilize biofuels which deliver reductions in greenhouse gas emissions; BIO recommends EPA sets the "R-factor," which may be considered as the efficiency with which the vehicle engine adapts to fuel variations, at a value of 1.0. By doing so, EPA will ensure the final rule does not discourage manufacturers from developing engines that can utilize new cleaner burning biofuels in order to achieve the overall goals of the proposed rule.

V. Conclusion

BIO believes the final Tier 3 rule has the potential to compliment other transportation related policies, including the RFS, which promote the continued development, commercialization and use of biofuels. We commend EPA's efforts to transition the emissions test fuel to help promote the goals of the RFS. BIO believes that EPA should work to set the emissions test fuel to maximize investment and adoption of all biofuels, including higher ethanol blends and drop-ins, while also maximizing the level of octane in the U.S. fuel supply. This action would help EPA meet one of its stated goals of this rulemaking to address the impacts of motor vehicles and fuels on air quality and public health.

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[14] The Proposed Rule at 29825.

[15] Hanson, R., Curran, S., Wagner, R., and Reitz, R., "Effects of Biofuel Blends on RCCI Combustion in a Light-Duty, Multi-Cylinder Diesel Engine," *SAE Int. J. Engines* 6(1):488-503, 2013, doi:10.4271/2013-01-1653.

To this end, we believe the final rule should allow for and encourage ongoing and greater use of E85 and E15, as well as the transition to higher blends of ethanol and drop-in biofuels.

BIO also supports EPA's proposal to allow vehicle manufacturers to request approval for an alternative certification fuel such as a high-octane E30 blend for vehicles they might design or optimize for use on such a fuel. As described above, we agree with EPA that this provision could help auto manufacturers meet their CAFE requirements.

BIO and its members look forward to working with EPA and the affected parties of this rulemaking to ensure implementation of a final Tier 3 rule that promotes the continued development of the biofuels industry as expressed in these comments, while complimenting other transportation regulatory requirements, including under the RFS and CAFE.

Thank you for your consideration of these comments.

Sincerely,

Brent Erickson,
Executive Vice President
Industrial & Environmental Section

To: Argyropoulos, Paul (b) (6) [redacted]
From: (b) (6) [redacted]
Sent: Mon 7/1/2013 3:34:04 PM

Paul: Just got back from seeing the Gran Bio plant in Brazil. Wow, want to catch you up on this deal. Hope you are well.

Michael McAdams | **Holland & Knight**
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax (b) (6) [redacted]

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Galloway'(b) (6) 'Tiger Tangavelu'(b) (6)
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Paul(b) (6) 'Cc: Fadzli'(b) (6)
From: Kassim
Sent: Fri 6/28/2013 9:53:45 PM
Subject: FW: GOFF 8 2013 - October 3-4 The Peabody Orlando _SPEAKERS DINNER 2 COTOBER AT 7 PM ORLANDO
8th GOFF - 2013_(AB) v9.docx
APOC_GOFF8_Ad 2 ANNCMT s_8x10.75_c4.pdf

Apologize for the error regarding the date and time of Speakers Dinner. It should read Wednesday Oct 2 at 7 pm .

Dear All

Please be informed that we have planned for the SPEAKERS DINNER on OCT 2 Wednesday at 7 pm in Orlando . We will provide details on dinner venue soon. Our Hon Minister of Plantation industry and commodities may join us as our special guest of honor. We hope everyone will be able to join us. Spouses are welcomed to join.

MS Kassim

AMERICAN PALM OIL COUNCIL

Tel: (b) (6)

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From: Kassim [mailto:(b) (6)

Sent: Friday, June 28, 2013 1:48 PM
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hayes (b) (6) (b) (6) (b) (6)
(b) (6) (b) (6) (b) (6)
(b) (6) argyropoulos.paul@epa.gov
Cc: Fadzli (fad (b) (6)
Subject: RE: GOFF 8 2013 - October 3-4 The Peabody Orlando

Dear Chairpersons and Speakers GOFF8

Herewith is the tentative program for GOFF8 awaiting final approval and confirmation from speakers. For those who have confirmed we thank you and we look forward to have you with us in Orlando at "The Peabody Hotel' 2-4 October. For those who have yet to confirm we appreciate if you can respond immediately and provide us the confirmation or otherwise. We plan to finalize the program as soon as possible and get the final list of speakers and chairpersons on board soonest possible.

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Thanks and regards

MS Kassim

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10:00 – 10:15am	Coffee Break/Snacks

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Time: 10:15 – 12:45 pm	
Session Chairman	**James Fry** *Chairman, LMC International*
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11:15 – 11:45 pm	Soybean Complex in South America. **Paul Provance** ** *Deputy Director, USDA*

11:45 – 12:15 pm	Palm Oil Price: Risks/Solutions/Opportunities. **Mark Joerger** *Vice President, Global Risk Management, Inc*
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12:45 – 1:45 pm	**Buffet Lunch.**
FORUM SESSION 2: **REALITIES ABOUT SUSTAINABILITY: NOW AND NEXT.**	
Time: 2:00 – 4.00 pm	
Session Chairman	**Tan Sri Datuk Dr. Yusof Basiron** *CEO MPOC*
2:00 – 2:20pm	Malaysian Sustainable Palm Oil (MSPO). *Speaker to be confirmed by MPOB/MPOC***
2:20 – 2:40pm	Sime Darby's Sustainability and Conservation Efforts: Now and Next. **Dr. Khairudin Hashim**** *Vice President III, Head of Group Sustainability and Quality Management, Sime Darby Berhad*
2:40 – 3:00pm	RSPO Certification and Its Supply Chain. **Bob Norman** *General Manager, Book & Claim Ltd*
3:00 – 3:20pm	Responsible Soy. **Richard Galloway** *Consultant USB*
3:20 – 3.40pm	WWF Sustainability Solutions. **David McLaughlin** ** *Vice President Agriculture, WWF*
3:40 – 4:00 pm	Q & A Running Coffee Break/Snacks

FORUM SESSION 3: **COMPETITIVE FORMULATIONS AND THE ECONOMIC BENEFITS.**	
Time: 4:00 – 6:00 pm	
Session Chairman	**Dr. Thiagarajan Tangavelu** *Technical Director, CalOil*
4:00 – 4:20 pm	Complex Palm Formulations for Baked Products. **Dr. Gerald McNeil** ** *Director of R&D and Marketing, Loders Croklaan*
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6:00 – 7:30 pm	Cocktail Reception

DAY TWO – FRIDAY, OCTOBER 4, 2013

REGISTRATION : 7:30 – 9:00 am	
FORUM SESSION 4: **HEALTH & NUTRITION TALK: THE FATS AND THINS OF EDIBLE OILS.**	
Time: 9:00 – 1:00 pm	
Session Chairman	**Dr. Pramod Khosla** *Associate Professor, Wayne State University*
9:00 – 9:20 am	Fats and Oils - What's on the Horizon with Respect to The 2015 US Dietary Guidelines? **Dr. Pramod Khosla** *Associate Professor, Wayne State University*
9:20 – 9:40 am	Palm Oil Tocotrienol Against Stroke. **Dr. Chandan Sen** *Ohio State University*
9:40 – 10:00am	Saturated Fatty Acids, Triglyceride Structure and Palm Oils: Their Complex Impact on Plasma Lipoproteins. **Dr. KC Hayes** *Professor, Brandeis University*
10:00 – 10:20 am	Vitamin A/Beta Carotene and Red Palm Oil. **Dr. Amy Rice** *Social Sector Strategies, Washington DC*
10:20 – 10:40 am	Questions & Answers
10:40 - 11:00 am	Coffee Break

FORUM SESSION 5: **BIODIESEL**	
Time: 11:00 am - 1:00 pm	
Session Chairman	**Michael McAdams** *Chairman of Advanced Biofuels Association*
11.00 – 11:20 am	Market Prospects of Palm Biodiesel. **Long Tian Ching** ** *Managing Director, Vance Group*

11:20 – 11.40 am	Sustaining Soy Biodiesel. **Don Scott** ** *Director of Sustainability, National Biodiesel Board*
11:40 – 12:00 pm	Biodiesel at a Crossroad. **Neville Fernandez**** *Neste Oil*
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12:20 – 1:00 pm	Panel Discussion/Questions and Answers/Closing Remarks
1:00 – 2:00 pm	Buffet Lunch

END OF FORUM

**awaiting confirmation

CONCURRENT EVENTS

VIDEO INTERVIEW WITH HON MINISTER AND SELECTED SPEAKERS*
Time: 10:00 – 5:00 pm, Thursday 3 Oct and Friday 4 Oct

PRESS CONFERENCE WITH HON MINISTER MPIC*
Time: 4:00 – 5:00 pm, Thursday 3 October

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hayes ((b) (6) [redacted] (b) (6) [redacted] (b) (6) [redacted]
(b) (6) [redacted] tclong@vancegroupltd.com; (b) (6) [redacted]
(b) (6) [redacted] (b) (6) [redacted]
Cc: Fadzli ((b) (6) [redacted]
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Thanks and regards

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AMERICAN PALM OIL COUNCIL

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Paul (b) (6)
Cc: Fadzli[fad (b) (6)
From: Kassim
Sent: Fri 6/28/2013 5:47:45 PM
Subject: RE: GOFF 8 2013 - October 3-4 The Peabody Orlando
8th GOFF - 2013_(AB) v9.docx
APOC_GOFF8_Ad 2 ANNCMT s_8x10.75_c4.pdf

Dear Chairpersons and Speakers GOFF8

Herewith is the tentative program for GOFF8 awaiting final approval and confirmation from speakers. For those who have confirmed we thank you and we look forward to have you with us in Orlando at "The Peabody Hotel' 2-4 October. For those who have yet to confirm we appreciate if you can respond immediately and provide us the confirmation or otherwise. We plan to finalize the program as soon as possible and get the final list of speakers and chairpersons on board soonest possible.

Meantime we appreciate if you will kindly forward just the GOFF8 2nd Announcement (as attached) to your contacts and associates for the early bird registration. We will confirm the final program as soon as possible. Registration can be done online at www.americanpalmoil.com or

call APOC at (b) (6)

Thanks and regards

MS Kassim

AMERICAN PALM OIL COUNCIL

Tel: (b) (6)

Cell: (b) (6)

GOFF 8

GLOBAL OILS & FATS FORUM 2013

Oils & Fats Market Watch

Advancing Sustainability & Sustenance

October 3 & 4, 2013 · Orlando, Florida

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8TH GLOBAL OILS AND FATS FORUM (GOFF 8)

Oils & Fats Market Watch: Advancing Sustenance and Sustainability

October 3 - 4, 2013
The Peabody Hotel, Orlando, Florida

FORUM PROGRAM

DAY ONE – THURSDAY, OCTOBER 3, 2013

REGISTRATION : 7:30 – 9:00am
KEYNOTE ADDRESS AND PLENARY PAPER PRESENTATION: 9:00 – 9:30am **Keynote Address** **YB Dato' Sri Douglas Uggah Embas,** Minister of Plantation Industries And Commodities, Malaysia ***Minister's attendance pending confirmation from MPIC**** 9:30 – 10:00 am **Plenary Paper** MARKET CHALLENGES AND GLOBAL OPPORTUNITIES FOR PALM OIL **Tan Sri Datuk Dr. Yusof Basiron** *Chief Executive Officer, MPOC*

10:00 – 10:15am	Coffee Break/Snacks

PLENARY SESSION: **GLOBAL OILS AND FATS MARKET OUTLOOK.**	
Time: 10:15 – 12:45 pm	
Session Chairman	**James Fry** *Chairman, LMC International*
10:15 – 10:45am	Vegetable Oils and the Energy Complex: Have the Drivers of the Vegetable Oil Market Changed Forever? **James Fry** *Chairman, LMC International*
10:45 – 11:15am	Vegetable Oils: Factors to Watch In the Year Ahead. **Anne Frick** *Vice President, Futures, Jefferies Bache LLC*
11:15 – 11:45 pm	Soybean Complex in South America. **Paul Provance** ** *Deputy Director, USDA*

11:45 – 12:15 pm	Palm Oil Price: Risks/Solutions/Opportunities. **Mark Joerger** *Vice President, Global Risk Management, Inc*
12:15- 12:45 pm	Panel Discussion.
12:45 – 1:45 pm	**Buffet Lunch.**
FORUM SESSION 2: **REALITIES ABOUT SUSTAINABILITY: NOW AND NEXT.** Time: 2:00 – 4.00 pm	
Session Chairman	**Tan Sri Datuk Dr. Yusof Basiron** *CEO MPOC*
2:00 – 2:20pm	Malaysian Sustainable Palm Oil (MSPO). *Speaker to be confirmed by MPOB/MPOC***
2:20 – 2:40pm	Sime Darby's Sustainability and Conservation Efforts: Now and Next. **Dr. Khairudin Hashim**** *Vice President III, Head of Group Sustainability and Quality Management, Sime Darby Berhad*
2:40 – 3:00pm	RSPO Certification and Its Supply Chain. **Bob Norman** *General Manager, Book & Claim Ltd*
3:00 – 3:20pm	Responsible Soy. **Richard Galloway** *Consultant USB*
3:20 – 3.40pm	WWF Sustainability Solutions. **David McLaughlin** ** *Vice President Agriculture, WWF*
3:40 – 4:00 pm	Q & A Running Coffee Break/Snacks

FORUM SESSION 3: **COMPETITIVE FORMULATIONS AND THE ECONOMIC BENEFITS.**	
Time: 4:00 – 6:00 pm	
Session Chairman	**Dr. Thiagarajan Tangavelu** *Technical Director, CalOil*
4:00 – 4:20 pm	Complex Palm Formulations for Baked Products. **Dr. Gerald McNeil** ** *Director of R&D and Marketing, Loders Croklaan*
4:20 – 4:40 pm	Kelloggs Food Products. **Dr. George Cherian** ** *Vice Chairperson, Kelloggs North America*
4:40 – 5:00 pm	Structuring The Next Generation of Vegetable Oils. **Dr. Larry Skogerson** *Vice President, R&D, Carbion Caravan*

5:00 – 5:20 pm	Vegetable Oils Based Formulations and Its Usage. **Tom Tiffany** ** *ADM*
5:20 – 5:40 pm	Walmart and CSPO: An Update. **Daniel Hazman** ** *Manager, Sustainability, Walmart Stores, Inc*
5:40 – 6:00 pm	Panel Discussion
6:00 – 7:30 pm	Cocktail Reception

DAY TWO – FRIDAY, OCTOBER 4, 2013

REGISTRATION : 7:30 – 9:00 am	
FORUM SESSION 4: **HEALTH & NUTRITION TALK: THE FATS AND THINS OF EDIBLE OILS.**	
Time: 9:00 – 1:00 pm	
Session Chairman	**Dr. Pramod Khosla** *Associate Professor, Wayne State University*
9:00 – 9:20 am	Fats and Oils - What's on the Horizon with Respect to The 2015 US Dietary Guidelines? **Dr. Pramod Khosla** *Associate Professor, Wayne State University*
9:20 – 9:40 am	Palm Oil Tocotrienol Against Stroke. **Dr. Chandan Sen** *Ohio State University*
9:40 – 10:00am	Saturated Fatty Acids, Triglyceride Structure and Palm Oils: Their Complex Impact on Plasma Lipoproteins. **Dr. KC Hayes** *Professor, Brandeis University*
10:00 – 10:20 am	Vitamin A/Beta Carotene and Red Palm Oil. **Dr. Amy Rice** *Social Sector Strategies, Washington DC*
10:20 – 10:40 am	Questions & Answers
10:40 - 11:00 am	Coffee Break

FORUM SESSION 5: **BIODIESEL**	
Time: 11:00 am - 1:00 pm	
Session Chairman	**Michael McAdams** *Chairman of Advanced Biofuels Association*
11.00 – 11:20 am	Market Prospects of Palm Biodiesel. **Long Tian Ching** ** *Managing Director, Vance Group*

11:20 – 11.40 am	Sustaining Soy Biodiesel. **Don Scott** ** *Director of Sustainability, National Biodiesel Board*
11:40 – 12:00 pm	Biodiesel at a Crossroad. **Neville Fernandez**** *Neste Oil*
12:00 – 12:20 pm	Biodiesel in the US EPA: Policies and Updates. **Paul Argyropoulos** ** *US EPA*
12:20 – 1:00 pm	Panel Discussion/Questions and Answers/Closing Remarks
1:00 – 2:00 pm	Buffet Lunch

END OF FORUM

**awaiting confirmation

CONCURRENT EVENTS

VIDEO INTERVIEW WITH HON MINISTER AND SELECTED SPEAKERS*
Time: 10:00 – 5:00 pm, Thursday 3 Oct and Friday 4 Oct

PRESS CONFERENCE WITH HON MINISTER MPIC*
Time: 4:00 – 5:00 pm, Thursday 3 October

*****

GOFF 8

GLOBAL OILS & FATS FORUM

2013

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Thurs. & Fri. October 3 & 4, 2013
The Peabody Hotel, Orlando, FL

Program & Topics

Day One – Thursday October 3

Session 1: Global Oils And Fats Market Outlook

Session 2: Realities About Sustainability: Now And Next

Session 3: Competitive Formulations And The Economic Benefits

Day Two – Friday October 4

Session 4: Health & Nutrition Talk: The Fats And Thins Of Edible Oils

Session 5: Biodiesel Developments and Updates

APOC

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To: Argyropoulos, Paul[redacted]
From: Brent Erickson
Sent: Thur 6/20/2013 5:21:56 PM
Subject: RIN article from EIA today.

Interesting piece from EIA on RIN prices...see link.

Brent Erickson

Executive Vice President

Industrial and Environmental Section

Biotechnology Industry Organization (BIO)

1201 Maryland Ave. S.W. , S. 900

Washington, D.C. 20024

PH [redacted]

www.BIO.org/ind

Follow me on ***Twitter*** *([redacted]*

I tend to think that EIA knows what they are doing. Although... their software (NEMS) doesn't explicitly model the RIN market. In this case, they are just using some reasonable arguments to make their point.

http://www.eia.gov/todayinenergy/detail.cfm?id=11671

To: Stewart, Gwen (b) (6) [redacted]
Cc: Argyropoulos, Paul (b) (6) [redacted]
From: Michael (b) (6) [redacted]
Sent: Tue 6/18/2013 3:50:18 PM
Subject: FW: July18th

Gwen: I had spoken to Chris about a week ago and invited him to speak at our July 18th board meeting at 10:00 am. Wanted to directly connect with you to see if it were possible to get this confirmed on his calendar. Thank you.

Michael McAdams | **Holland & Knight**

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax (b) (6) [redacted]

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To: Argyropoulos, Paul (b) (6) [redacted]
From: Michael (b) (6) [redacted]
Sent: Tue 6/18/2013 3:44:48 PM
Subject: FW: July18th

Paul: the computer keeps kicking this back from me as the wrong email address can you push along from yours to see that it get there. Thanks.

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax (b) (6) [redacted]
(b) (6) [redacted]

From: McAdams, Michael J (b) (6) [redacted]
Sent: Tuesday, June 18, 2013 11:42 AM
To: (b) (6) [redacted]
Cc: 'Argyropoulos, Paul'
Subject: July18th

Gwen: I had spoken to Chris about a week ago and invited him to speak at our July 18th board meeting at 10:00 am. Wanted to directly connect with you to see if it were possible to get this confirmed on his calendar. Thank you.

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) [redacted] | Fax 202 (b) (6) [redacted]

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To: (b) (6) Steward (b) (6)
Cc: Argyropoulos, Paul (b) (6)
From: (b) (6)
Sent: Tue 6/18/2013 3:41:32 PM
Subject: July18th

Gwen: I had spoken to Chris about a week ago and invited him to speak at our July 18th board meeting at 10:00 am. Wanted to directly connect with you to see if it were possible to get this confirmed on his calendar. Thank you.

Michael McAdams | **Holland & Knight**

President, ABFA
Sr Policy Advisor
800 17th Street, NW Suite 1100 | Washington DC 20006
Phone (b) (6) | Fax (b) (6)
(b)

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