



ABOUT US

Imperium Renewables, Renewable Biofuels and Green Earth Fuels are the three largest independent biodiesel producers in the United States. Our three companies have a combined capacity to produce over 350 million gallons of biodiesel annually, and employ approximately 150 employees in Washington State and Texas. As early movers in the industry, our companies have weathered the regulatory cycles and outside pressures as this industry matures. Throughout, we have continued to provide local jobs and to reinvest to further enhance our production capabilities and the critical infrastructure necessary to continue the success of this program.

MEETING THE NATION'S ENERGY NEEDS; ENHANCING ENERGY SECURITY

The biomass-based diesel (BBD) industry is the success story of the RPS. The industry has met and exceeded its RFS2 renewable volumetric requirements every year since the program's inception and is producing nearly enough additional volume to provide the remainder of the advanced biofuels category. In fact, the industry currently is producing over 166 million gallons of biomass-based diesel a month – an annual rate of nearly 2 billion gallons. Today's rate of production translates to over 3 billion advanced biofuel-equivalent Renewable Identification Numbers (RINs) available to enable obligated parties to meet their volumetric requirements. Moreover, the industry has the capacity to produce even higher volumes to meet the annual increases in the RFS volumes.

HELPING MEET THE PRESIDENT'S GOALS FOR GREENHOUSE GAS REDUCTIONS

Biodiesel is an environmentally safe fuel, and is the most viable transportation fuel when measuring its carbon footprint, life cycle emissions and energy balance. EPA found that biodiesel reduces GHG emissions by between 57 and 86 percent when compared to petroleum diesel fuel. Ozone forming potential of the hydrocarbon emissions of pure biodiesel is nearly 50 percent less than that of petroleum fuel. Biodiesel production also has been found to produce less smog-forming emissions than petroleum diesel production.

CONTRIBUTING TO THE ECONOMY

The biomass-based diesel industry is growing the nation's economy, and especially the farm economy. The industry has contributed to a revitalization of the farm economy, raising farm income, agricultural land values and tax revenues, while employing over 50,000 workers across the country. The industry contributes over \$17 billion to the GDP and adds approximately \$2 billion to household incomes. Additionally, reduced GHG and particulate emissions produce health benefits that have a positive direct and indirect economic benefit.

EASY AND COST-EFFECTIVE SOLUTION THAT'S AVAILABLE TODAY

Biomass-based diesel is here today, producing affordable fuels and driving down prices. With a current rate of production of 2 billion gallons a year and a capacity to grow, biomass-based diesel has demonstrated its viability as a cost-competitive alternative to petroleum-based diesel. Rack rates for biodiesel have fallen below petroleum-based diesel, and some major non-obligated diesel retailers are buying biodiesel because of price. The industry has diversified its feedstocks, and despite increased production, the cost of feedstocks has fallen below 2008 levels. Research studies conclude there are both adequate and affordable feedstocks to maintain and expand production volume. Finally, biomass-based diesel has no significant technical or infrastructure issues, and no blend wall issues. It can expand incrementally with no disruptions to infrastructure, vehicles, or the economy.

BIOMASS-BASED DIESEL IS HELPING THE RFS WORK AS CONGRESS PLANNED

Congress anticipated the possibility of challenges in the ramp-up of the RFS by building in flexibility to meet categorical volume requirements in many ways. This flexibility is working today. While the development of cellulosic biofuels has lagged behind projections, the biomass-based diesel industry has increased production to make up for that shortfall, nearly filling the entire advanced biofuels category volume requirement. With ample and affordable feedstocks and currently available additional capacity, the industry can meet both an increased biomass-based diesel volumetric requirement and meet an increase in the advanced biofuels category volume.

ALLOW THE RFS VOLUME REQUIREMENTS FOR BIOMASS-BASED DIESEL AND ADVANCED BIOFUELS TO GROW IN 2014

The biomass-based diesel industry is requesting that the Administration set the 2014 volume to reflect current production and available capacity. With 2013 production topping 1.7 billion gallons and current monthly production of 166 million gallons reaching an annual rate of 2 billion gallons, the industry is confident it can meet a volume requirement at 2 billion gallon level for 2014 and meet an increase in the 2014 advanced biofuels category volume. If EPA anticipates approving additional pathways that will make eligible significant new volumes of imported fuel for the biomass-based diesel category during 2014, we urge EPA to adjust the volume upward from this request to accommodate these anticipated new volumes. Further, we would like to highlight our concern that setting a 2014 requirement below the 2 billion gallon level will result in decreased domestic production, worker layoffs and a pull back from new investment in capacity in this sector of the RFS.