

April 30, 2018

**ATTN: Docket ID No. EPA-HQ-OAR-2018-0131**

James W. Caldwell  
Compliance Division, Office of Transportation and Air Quality  
Mail Code 6405A  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Submitted via Federal eRulemaking Portal: <https://www.regulations.gov>

**Re: Registration of Isobutanol as a Gasoline Additive**

Dear Mr. Caldwell,

The Renewable Fuels Association (RFA) appreciates the opportunity to provide these comments in response to the Environmental Protection Agency's (EPA) Request for Information (RFI) regarding the registration of isobutanol as a fuel additive (83 Fed. Reg. 13460; March 29, 2018).

RFA is the leading national trade association representing U.S. fuel ethanol producers. Its mission is to advance the development, production, and use of low-carbon renewable fuels by strengthening America's biofuel industry and raising awareness about the benefits of renewable energy. Founded in 1981, RFA serves as the premier forum for industry leaders and supporters to discuss biofuel policy, regulation, and technical issues. RFA's 300-plus members are working daily to help America become cleaner, safer, more energy secure, and more economically vibrant.

RFA supports the approval of the application submitted by Butamax Advanced Biofuels seeking registration of bio-based isobutanol ("biobutanol") as a fuel additive under the provisions of CAA 211(f)(4). It is clear that Butamax has submitted all of the required information to support approval of the application by the Agency.

Like bio-derived ethanol, biobutanol is a renewable alcohol that reduces greenhouse gas emissions and offers other environmental benefits. As such, we believe biobutanol may have the potential to serve as a cost-effective tool for helping to meet renewable fuel and advanced biofuel blending obligations under the Renewable Fuel Standard (RFS).

In response to the specific information sought in the RFI, we do not believe additional health-effects testing under Tier 3 provisions are necessary, nor do we believe that "additional regulatory controls" beyond those specified in 40 CFR parts 79 and 80 are needed.

Thank you again for the opportunity to offer these comments. Please contact Kelly Davis at [kdavis@ethanolrfa.org](mailto:kdavis@ethanolrfa.org) or 636.594.2286 with any questions or further information requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Dinneen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Bob Dinneen  
President & CEO