# Review of EPA/OTAQ Biofuel LCA Work for the RFS Program

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## **RFS LCA Modeling Approach**

- The EISA definitions required the use of a number of models and tools (we developed a hybrid attributional / consequential approach)
  - Including direct and indirect impacts such as land use change required a consequential approach and analysis of markets (we focused on agricultural sector indirect impacts)
  - We also included our own process and emissions attributional modeling as part of the rulemaking for biofuels and the petroleum baseline
- Our approach required that we consider how commodity markets are affected by increasing demand for biofuels
- We did this using a scenario approach in which we ran models with different volume scenarios to isolate the impact of a specific fuel
  - We measured the impact of the delta between baseline projected fuel volume in 2022 (i.e., without RFS2) and projected RFS mandated volume
  - Held volumes of other fuels constant at RFS mandated levels
- Indirect impact results were based on a comparison of two modeled scenario results, not actual measurements.

Biofuel	Reference Case – Low Volume	Control Case – High Volume	Change
Corn Ethanol	12.3	15.0	2.7
Switchgrass Cellulosic Ethanol	0	7.9	7.9
Corn Residue Cellulosic Ethanol	0	4.9	4.9
Imported Sugarcane Ethanol	0.6	2.2	1.6
Soybean Oil Biodiesel	0.1	0.6	0.5

Table 2.3-1. Fuel Volume Scenarios Considered in This Analysis (Billions of Gallons)

### **RFS and Jet Fuel**

- Jet fuel can generate RINs under the program
  - If it meets the criteria specified in the RFS regulations, including lifecycle GHG emissions reductions and use of qualifying renewable biomass feedstocks
- EPA does not use jet fuel when setting annual volume requirements but obligated parties can use jet fuel RINs for compliance
- List of approved jet fuel pathways:

	Feedstock	Process Technology	D-Code
1	Soybean oil		
2	Oil from annual cover crops		
3	Algal oil	lludrotroating	
4	Biogenic waste oils/fats/greases	Hydrotreating	D4 or D5
5	Non-food grade corn oil		
6	Camelina sativa oil		
	Cellulosic biomass from		
7	Crop residue		
8	Slash, pre-commercial thinnings and tree residue		
9	Annual cover crops		
10	Switchgrass		
11	Miscanthus	Any	D7
12	Energy cane	Any	
13	Arundo donax		
14	Napier grass		
	Cellulosic components of		
15	Separated food waste		
16	Separated MSW		

#### LCA System Boundaries and Models Used



#### Precision and Completeness of Biofuel Evaluations (Adapted from Figure 2 in Creutzig et al. 2012)



EISA dictated our approach to LCA for the RFS analysis but there is a range of approaches and tools that could be used to evaluate the LCA of biofuels

Creutzig, F., Popp, A., Plevin, R., Gunnar, L., Minx, J, Edenhofer, O. 2012. "Reconciling top-down and bottomup modelling on future bioenergy deployment. *Nature and Climate Change*. Published online March 4, 2012