



October 6, 2019

To the Independent Particulate Matter Review Panel
RE: Public Meeting of October 10-11, 2019

On behalf of the members of the Clean Fuels Development Coalition, including Farmers Union Enterprises, Urban Air Initiative, and others, we applaud your actions to reconvene and continue your important work to protect public health.

We believe the issue of fine particulate matter is grossly ignored by EPA and the scientific expertise your panel provides is critical to ensuring maximum standards and controls. By EPA's own admission they fail to account for polycyclic aromatic hydrocarbons (PAH's) and have ignored the overwhelming evidence of the causation as it relates to gasoline. We urge this panel to include the importance of regulating mobile source air toxics as a key consideration in setting ambient particulate standards. Coupling standards with enforcement of existing provisions such as section 202 (I) of the CAAA, i.e. the toxics provision, is critical if we are to provide maximum public health protection.

We have conducted extensive research on gasoline composition and the negative effects of the highly carbon intensive toxic aromatic compounds refiners use to increase octane. The microscopic benzene-based emissions defy any vehicle filtering technology and equally defy the human lung as a filtering mechanism. Consequently, there is an increasing body of evidence that these fine particulates directly enter the bloodstream and are causing neurological ailments as well as respiratory disease.

We respectfully ask that you consider several attached documents providing much more detail on this subject, beginning with our [*Mobile Source Air Toxics Fact Book: What's In Our Gasoline is Killing Us*](#). This extensively researched and sourced fact book should be of direct relevance to this subject. Similarly, an article in *The Guardian*, [*Revealed: air pollution may be damaging every organ in the body*](#), referencing work by Dr. Schraufnager, also supports these findings.

We also have submitted detailed comments to the U.S. Environmental Protection Agency and the Department of Transportation on the pending [*Safe Affordable Fuel Efficiency \(SAFE\) Rule*](#) which would set standards for the next phase of the original Corporate Average Fuel Economy (CAFE) rule. In their solicitation of comments EPA specifically asked how the role of octane would be consistent with Title II of the Clean Air Act, which is the title that requires EPA to reduce mobile source air toxics. Increasing octane to a 98-100 RON (Research Octane Number) would provide significant cost-effective benefits, allowing automakers to downsize engines and increase compression ratios to achieve greater mileage while emitting less carbon and of course, using less petroleum. However that octane cannot come from the oil barrel as it would be illegal under the Clean Air Act. We are concerned that EPA is well aware of this and therefore will not increase octane in the SAFE rule, thereby denying the benefits that would come from the aforementioned downsizing of engines and improving efficiency.

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We can do both—increase octane as the maximum control technology, and do so in compliance with the toxics controls required by law. I refer you to a recent article [It's time to take another look at biofuels article by Sen. Chuck Grassley \(R-Iowa\) and former Sen. Timothy Wirth \(D-Colo.\) and Chairman of the UN Foundation](#), urging the environmental and health communities to look at 30% ethanol blends as a readily available tool.

We have the ability to directly address the threat of ultra-fine particulates through cleaner fuels, and to focus on gasoline emissions which are the predominant source of these harmful particulate emissions.

Thank you in advance for your consideration of our position. We hope you will review the referenced material and we would be very pleased to provide additional information. We have a landing page on our website dedicated to our [SAFE Gasoline Campaign](#) that is also an excellent source of information on the entire subject of gasoline, UFPs, and related areas.

Sincerely,

Douglas A. Durante

Douglas A. Durante
Executive Director