

June 26, 2009

MEMORANDUM

TO: Air Docket EPA-HQ-OAR-2005-0161

SUBJECT: Information on the peer review process being conducted on the RFS2 lifecycle GHG analysis

To meet the lifecycle requirements as defined by the Energy Independence and Security Act of 2007 (EISA), EPA, in close cooperation with USDA and the DOE, has developed a methodology that reflects the use of the best tools and the best science available today. EPA has specifically relied on a number of peer reviewed models and data sources for individual components of the analysis. This methodology is described in detail in both the Preamble and Draft Regulatory Impact Analysis of EPA's Notice of Proposed Rulemaking available at: <http://www.epa.gov/OMS/renewablefuels/#regulations>.

In addition, several new pieces of analysis were developed to support this lifecycle assessment and these new pieces are now undergoing scientific peer review contemporaneously with the public comment period of the rulemaking.

The new pieces of analysis undergoing peer review are:

1. Land use modeling (use of satellite data/ land conversion GHG emission factors)
2. Methods to account for the variable timing of GHG emissions
3. Our estimates of GHG emissions from foreign crop production (modeling and data used)
4. How the models EPA relied upon are used together to provide overall lifecycle estimates (not a review of models themselves but how the results of each have been used together)

The reviews are being conducted following OMB's peer review guidance that ensures consistent government-wide implementation of peer review and according to EPA's longstanding and rigorous peer review policies.

In accordance with this guidance, EPA uses independent, third-party contractors to conduct an external peer review:

- Contractor identifies list of expert reviewers, checking for possible conflict of interest. EPA provides contractor description of expertise required and examples of experts that fit the expertise needed for each review.
- EPA provides charge questions for each review which guides the review process. For these peer reviews, the charge questions were reviewed by OMB.
- Contractor also conducts meetings, teleconferences, etc, (as needed) in order to clarify technical components of the product and develops the peer review record.
- Peer reviewers work independently and are not asked to reach a consensus decision.

The peer review record will be made available in the public docket upon completion of the review, including:

- Materials provided to the peer reviewers
- List of names and affiliations of the peer reviewers
- Summary of comments, as well as comments attributable to individual reviewers

All four peer reviews are underway and on schedule to be completed before the end of the comment period.