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To: [comments_EMP](#)
Subject: [EXTERNAL] 2019 Draft Energy Master Plan Comments By National Green Fuels LLC
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I. Introduction

National Green Fuels (NGF) is a company which develops waste to transportation fuel and specialty chemical projects.

NGF's founding Chair is James J. Wilson who has a long track record of successful project development and construction. He founded Interstate General Company (IGC) which was involved in construction of approximately 25,000 housing units through 2009. Its most significant development was the planned community of St. Charles Maryland started in 1968. It consisted of approximately 9,100 acres of property. It has approximately 12,000 housing units and approximately 4 million square feet of business and commercial buildings. By 2009 St. Charles had a population of approximately 40,000. IGC was involved in approximately \$4 billion of project development. IGC and its successor American Community Properties Trust were sold in 2006.

IGC founded and began financing Interstate Waste Technologies (IWT) in the mid-1980s. A business plan was developed, management hired, technologies studied and development activities undertaken. Approximately \$20 million was invested in IWT. Originally, the business plan was to use high temperature gasification to convert waste into syngas to make electricity. This became financially unfeasible with the precipitous drop in the price of natural gas and certain changes in federal regulation of the electric grid.

An affiliated company, NGF, switched focus from electricity to the generation of various types of transportation fuels and specialty chemicals.

II. Comments/Concerns

The Energy Master Plan states "In New Jersey, the transportation sector accounts for 46% of the state's net greenhouse gas emissions." It states that the "global threat of climate change is grave and that it demands swift local action and focused state leadership." (Page 9) NGF applauds the state's commitment to reducing its greenhouse gas emissions immediately and aggressively. NGF agrees with the state's first strategy and priority to reduce emissions from the transportation sector. However, NGF believes that there are additional steps the state can and should take to achieve its goals.

The Plan states at page 34 that New Jersey plans to “explore policies that can accelerate the adoption of alternative fuels in the transportation sector.” NGF has developed a proprietary technology to convert the energy value in biomass, plastics and other energy-rich municipal solid waste into renewable diesel fuel. NGF uses a commercially-proven, high temperature gasification technology to first convert the solids into a synthesis gas (syngas). The gasification technology is integrated with another established technology – the Fisher-Tropsch process – which converts the syngas into renewable diesel.

In short, the NGF technology platform provides an integrated solution to make renewable diesel fuel for transportation and to reduce greenhouse gas and methane emissions.

The draft Energy Master Plan mentions renewable energy diesel in passing. NGF submits more focus and government support is required to achieve the benefits of making clean, renewable diesel fuel from municipal solid waste.

First, EPA states that clean renewable diesel reduces GHG emissions by 57% and up to 86% when compared to petroleum based diesel. There is a welcome move toward electrification of cars and light trucks. However, long haul trucks require diesel fuel because of the distances they travel, their cost and inability to return frequently for recharging. UC Davis and the National Center for Sustainable Transportation did a groundbreaking study entitled “Strategies For Transitioning To Low Carbon Emission Trucks In The United States” dated June 2015. Its purpose was to analyze the feasibility of achieving an 80% reduction in CO₂ equivalent GHG emissions in the U. S. and California from trucks in the 2050 timeframe. The study concluded that a combination of strategies, including renewable diesel for long haul trucks, is required to achieve transportation pollution reduction goals. The study urges immediate action and notes even then how challenging the goal will be to achieve by 2050. The study recommends a ramp-up of bio-fuels “from waste materials” to drop in biofuels, such as “renewable diesel”. (page 6) The study notes the importance of adequate supplies of low GHG fuel. It states “Given that light-duty vehicles seem more amenable to electrification than do large trucks (especially long haul trucks), it may make sense to set policies that push available biofuels toward larger trucks”. (Page 42)

Second, diversion of municipal solid waste from landfills and incinerators to NGF facilities will eliminate large quantities of methane and GHG. EPA has made clear that “landfills are a significant source of methane, which is a potent greenhouse gas pollutant”. EPA studies and hearings concluded that reducing GHG and methane from landfills “will improve air quality and reduce public health and welfare effects associated with exposure to hazardous landfill gas emissions.” The EPA’s conclusions about hazardous landfill gas emissions were just affirmed by a respected Federal Court Judge in State of California v. United States Environmental Protection Agency, Case No. 18-cv-03237-HSG, May 6, 2019 at page 2.

NGF recommends:

1. Goal 2.3.6 on page 58 should be amended to include maximizing the use of gasification projects to reduce GHG pollution from the transportation sector as well as from landfills and incinerators. NGF submits there is a place for anaerobic digestion technologies, but a much

greater, more practical role for NGF's gasification projects. There should be government financial and other incentives for gasification as well as anaerobic digestion.

2. Financial and other required incentives include aggressive government support, financial subsidies, and tax credits.
3. Relevant State agencies should take immediate action to study the benefits of gasification and to define strategies and methods to accelerate project development, including streamlining the project permit procedure. The threat of climate change is here and now. Government should not wait for finalization of the Plan to take action.

NGF will be pleased to answer questions or provide additional information to the Energy Master Plan Committee.

Respectfully submitted,

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