

TELEFAX



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Comments on the proposed fuel quality standard for fuel grade ethanol. July 2005

Dear Mr Gray,

TD Chemicals PTY LTD is an independent chemical engineering business that provides consulting services to the Australian ethanol industry. It has over forty years experience in the production of ethanol from sugar cane feed stocks and has been used as a key consultant in several Australian fuel ethanol project feasibility studies.

1. The proposed standard does vary significantly from established and accepted international standards eg ASTM D 4806. Seven areas of difference noted are:

Methanol (lower limit)

Non volatile matter (new specifications)

Gums (not specified)

Phosphorus (new specifications)

Chloride (not specified, and considered critical as Queensland cane molasses beer contains unusually high levels of chlorides)

Sulphur (higher limit)

Denaturants (not specified)

2. Whilst the reasons listed for these differences have been noted, it is considered prudent to limit the number of specifications to a shorter list already proven internationally. In particular, it may prove impractical to meet all these specifications in future Australian fuel ethanol distilleries. Current Australian fuel ethanol producers are using either semi-refined feed stocks (starch), or multi distillation stages (technical grade alcohol and cyclohexane dehydration), which differ significantly from the expected whole grain and single ethanol product plants under consideration.
3. We therefore recommend that the proposed standard stay closer to the proven international ones of the USA and Europe, and that it is not over-complicated with unnecessary specifications.

Yours sincerely,