



April 6, 2026

U.S. Environmental Protection Agency
EPA Docket Center
OAR Docket ID No. EPA-HQ-OAR-2025-1806
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Docket ID No. EPA-HQ-OAR-2025-1806

Re: Comments on the Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs¹

Dear Assistant Administrator Szabo,

Thank you for the opportunity to provide information on the Clean School Bus Funding Programs. The Iowa Biodiesel Board is a biodiesel producer-led association that represents the entire biodiesel chain in Iowa, including fuel manufacturers, distributors and farmers who produce the natural feedstocks used in biodiesel production. Founded by the Iowa Soybean Association in 2007, IBB operates an independent organization and board. The IBB works to promote the commercial and economic success of biodiesel in Iowa. Iowa is home to 8 operating biodiesel plants, producing an estimated 266 million gallons of biodiesel in 2025. Although this represents a significant decrease from our 2024 production levels, Iowa remains the top biodiesel-producing state. Iowa is also a leader on state biodiesel policies, offering comprehensive incentives for production, distribution and use.

Through advocacy and outreach, IBB works to advance the goals of American energy and economic resilience laid out and enabled through federal policy. Renewable fuels benefit every American through leveraging the power of American agriculture to produce cleaner-burning fuels while advancing American energy independence. We advocate the continued growth of renewable fuels including biodiesel as an integral part of American energy production.

Including biomass-based diesel in the definition of “clean school bus” allows for biodiesel projects to be eligible for this funding opportunity going forward. The Iowa Biodiesel Board recommends expanding this funding opportunity in a way that not only includes allowing replacement of vehicles, but also add-on fueling systems, which will allow school districts to achieve Green House Gas reductions without needing to purchase new vehicles if their current buses still have a significant useful life. The IBB also encourages EPA to explicitly list all blends of biodiesel, including B20 (20% biodiesel) up to B100 biodiesel as an eligible fuel under the Clean School Bus Program. The program should recognize that higher biodiesel blends deliver proportionally greater emissions reductions and health benefits, and should be incentivized accordingly. Finally, we ask that the program allow funding for onsite biodiesel fueling infrastructure to be

¹ U.S. Environmental Protection Agency. Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs EPA-HQ-OAR-2025-1806, 91 FR 8234 (February 20, 2026), available at <https://www.federalregister.gov/d/2026-03351>

included as an eligible program expenditure, consistent with how the program has historically treated EV charging infrastructure.

The biodiesel and renewable diesel industry is on a path to sustainably double the U.S. market to 6 billion gallons annually by 2030. Using cleaner, better fuels today can lower health impacts and costs for cities and transportation corridors into the future. This can and should include school buses, which transport our country's most precious cargo.

It is with the interests of the biodiesel producers and farmers who enable clean energy production that we submit the following comments for EPA's consideration in response to the Request for Information.

Iowa Biodiesel Production and Availability

Iowa's biodiesel industry has made substantial investments over the past several years in biofuel production, feedstock supply and distribution infrastructure, reinforcing the state as a leading contributor to America's clean fuel supply. Iowa's biodiesel plants have the capacity to produce 400 million gallons per year, reflecting the depth and maturity of the state's production base.

The economic significance of this industry extends well beyond the pump. According to Decision Innovation Solutions, after accounting for indirect and induced effects, Iowa biodiesel production contributed a total of 1,198 jobs, \$92.0 million in labor income, \$67.2 million in value added and nearly \$1.5 billion in output to the Iowa economy in 2025². These figures underscore that Iowa biodiesel is not simply an energy solution — it is an economic engine for rural communities across the state.

Iowa's biodiesel is derived primarily from soybean oil, a feedstock grown abundantly by Iowa farmers, creating a uniquely integrated and locally rooted supply chain. This homegrown advantage means Iowa is exceptionally well-positioned to reliably supply clean, domestically produced fuel for programs like the EPA's Clean School Bus program — delivering environmental benefits to students and communities while strengthening Iowa's agricultural and rural economies.

We believe if the cost barrier is lowered, many Iowa school districts would seize the opportunity to use a homegrown, state-produced fuel that supports the economy while protecting the health of its children.

Usage, Quality Standard and Engine Warranties

Biodiesel works well in both legacy and new technology diesel engines, offering immediate carbon and particulate matter reductions in existing fleets of vehicles. Utilizing biomass-based diesel in today's diesel applications is more economical, considering current fleet financial constraints and limited access to other technologies. Biodiesel offers fleets an easy, affordable, low-carbon solution to improve the sustainability of their operations in their existing and new diesel vehicles and equipment with fuels that are available now.

Biodiesel, a renewable, cleaner-burning diesel replacement, meets ASTM specifications and can be used in existing diesel engines without modification.³ All Original Equipment Manufacturers (OEMs) in the United

² <https://iowarfa.org/wp-content/uploads/2026/03/2025-FINAL-Iowa-Economic-Contribution-Report.pdf>

³ ASTM D6751 for B100 and ASTM D7467 for B6-to-B20 blends

States support the use of at least B5 biodiesel blends (5% biodiesel), and most support B20 (20% biodiesel). Several companies even support blends up to B100 (100% biodiesel) in certain applications.⁴

Additionally, companies can easily and cost-effectively convert their existing heavy-duty fleet vehicles to B100 with the help of fuel conversion systems, like Optimus Technologies' Vector System and Immixt - Renewable Fuel Systems.

Environmental and Health Benefits

Clean fuels stand out as an immediate, proven solution. As drop-in replacements for petroleum diesel fuels, they reduce lifecycle carbon emissions by at least 70% on average. In addition to reducing greenhouse gas emissions, B100 also reduces particulate matter emissions by 55-80%, carbon dioxide by 74% on average, aromatic compounds by 61-100%, and carbon monoxide by 27-48%. For every 100 million gallons of U.S. biodiesel and renewable diesel used today in place of petroleum, particulate matter is cut by approximately 252 tons. Biodiesel can make a difference now by reducing harmful tail-pipe emissions that have this adverse impact and is one of the simplest, most cost-effective solutions available right now.

Time Value of Carbon

Biodiesel and renewable diesel are solutions that reduce toxic and GHG emissions today. It has been shown that the immediate investment in a mature, currently commercialized biomass-based diesel fuel yields higher annual greenhouse gas emissions reductions than waiting for a technology that is still considered immature.⁵

The benefits of using and increasing the use of biomass-based diesel now will not only provide immediate greenhouse gas reductions but will also have a positive impact on health in communities with high diesel emissions rates.

Examples of Success in Iowa

Iowa has pushed the envelope on high blends of biodiesel, widely considered anything over 20%. It was the first state to enact an incentive for B30 and above. It is also home to some high profile B100 uses.

Iowa State University — Ames, Iowa

Iowa State University's BioBus program offers a compelling example of biodiesel innovation rooted in education and community. CyRide — the public bus system serving Ames, a collaboration between the City of Ames and Iowa State University — was awarded \$14.6 million through the Federal Transit Administration's Bus and Bus Facilities Competitive Program to expand its facility and convert 20 buses to operate on 100% biodiesel (B100), including installation of an underground B100 fuel tank and on-site blending equipment. CyRide already operated five buses on B100 as part of a pilot program, with early results showing strong performance and reduced emissions. As CyRide Transit Director Barbara Neal

⁴ Clean Fuels Alliance America, OEM Support Summary available at https://cleanfuels.org/wp-content/uploads/OEM-Support-Summary_Nov25.pdf

⁵ Frank, Jenny & Brown, Tristan & Haverly, Martin & Slade, Dave & Malmsheimer, Robert. (2020). Quantifying the comparative value of carbon abatement scenarios over different investment timing scenarios.

stated, B100 is "a practical, cost-effective approach to lowering emissions using a fuel produced here in Iowa."⁶

The ISU example demonstrates that B100 biodiesel is not a future concept — it is working today in Iowa's own communities, and it is scalable.

PepsiCo and Pilot Travel Centers — Urbandale, Iowa

Iowa is also home to a landmark achievement in commercial fleet fueling. The Des Moines region is now home to one of a handful of above-ground B99 commercial fueling pumps in the country, located at a Pilot Travel Center in Urbandale. The Iowa Biodiesel Board and Iowa Soybean Association joined Pilot Travel Centers, PepsiCo, and Optimus Technologies to celebrate the launch, with IBB and ISA contributing soybean checkoff funding to support the project. State funding came from the Iowa Renewable Fuels Infrastructure Program.

PepsiCo, which has set ambitious environmental goals and is backing them with real action, currently deploys 17 Class 8 Volvo tractor-trailers equipped with Optimus technology to make them capable of seamlessly running on pure biodiesel from the pump.⁷ The program offers a powerful proof of concept for high-blend biodiesel in commercial fleets.

Conclusion

The Clean School Bus Program represents a critical opportunity to protect students' health, strengthen rural economies and advance American energy independence — and biodiesel is ready to deliver on all three fronts today. Iowa's biodiesel industry, with 400 million gallons of annual production capacity, a well-developed distribution network and a homegrown soybean feedstock supply chain, is uniquely positioned to help fuel this transition without delay.

Including B100 and other high-blend biodiesel as eligible fuels under the program is not a theoretical proposition — it is a proven one. CyRide's B100 fleet in Ames and PepsiCo's commercial B99 program in Urbandale demonstrate that high-blend biodiesel works at scale, right now. School districts are ready to follow suit if given access to this funding.

The Iowa Biodiesel Board respectfully urges EPA to explicitly recognize biomass-based diesel as an eligible clean fuel under this program; to ensure that add-on fuel conversion systems and onsite fueling infrastructure qualify as eligible expenditures alongside vehicle replacement; and to incentivize higher biodiesel blends in proportion to the greater emissions and health benefits they deliver. These steps would allow school districts to achieve meaningful, immediate greenhouse gas and particulate matter reductions — protecting the children riding these buses — while also supporting the American farmers and producers who make this fuel possible.

⁶"CyRide to Expand Facility, Convert 20 Buses to 100% Biodiesel with Federal Grant," *Biobased Diesel Daily*, December 2, 2025. <https://www.biobased-diesel.com/post/cyride-to-expand-facility-convert-20-buses-to-100-biodiesel-with-federal-grant>

⁷"Iowa Biodiesel Board and Iowa Soybean Association Celebrate B99 Biodiesel Expansion with Pilot, PepsiCo," *Iowa Biodiesel Board News Releases*, June 2, 2025. <https://www.iowabiodiesel.org/the-newsroom/ibb-news-releases/iowa-biodiesel-board-and-iowa-soybean-association-celebrate-b99-biodiesel-expansion-with-pilot-peps>