

# **Biodiesel and Renewable Diesel Rulemaking 2<sup>nd</sup> Public Workshop**

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## **Overview**

- ***Background***
- Biodiesel Studies Update
- Comments from First Workshop
  - Literature Review
  - Fuel Properties
  - Certification
- Next Steps
- Contacts
- Discussion

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## Background

- Driving Forces:

- Global Warming Solutions Act of 2006
- Low Carbon Fuel Standard (2009)
- Increasing demand for biofuels
- Studies show an increase in NO<sub>x</sub> with increasing biodiesel blends

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## Background

- What is biodiesel?

- Straight Vegetable Oil (SVO) vs Fatty Acid Methyl Esters (FAME)
- Feed stocks

- What is renewable diesel?

- Hydrotreating
- Feed stocks

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## Background

- Biodiesel and renewable diesel blends:
  - Blends are labeled B% or R% to signify the amount of biodiesel or renewable diesel blended into petroleum diesel
  - Example:
    - B5 is a blend of 5 percent biodiesel and 95 percent petroleum diesel
    - R20 is a blend of 20 percent renewable diesel and 80 percent petroleum diesel

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## Background

- 2006-2009
  - Multimedia workgroup meetings began, multimedia testing largely completed but ongoing
- 2010
  - First public workshop to discuss future regulation in January

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## **Biodiesel Studies Update** **Emissions Studies Update**

- CeCERT NOx mitigation and impact Study completed-two on-road engines
- TRU study
  - Part one: CARB, Soy B50, Soy B100
  - Changes in engine operation
  - Part two: CARB, Soy B5, Soy B20, B100
- Non-road engine
  - Pre-testing started

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## **Biodiesel Studies Update**

### **Emissions Studies Update Cont**

- Chassis testing at MTA
  - In-depth emissions testing completed for C15 and MBE4000 equipped trucks
    - Chemical and health effects analysis
      - C15 expected to be completed by the July workshop
      - MBE4000 underway
  - Vehicle three, Cummins ISM equipped truck will start in the first part of June
  - School Bus with DPF

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## **Biodiesel Studies Update**

### **July Workshop**

- Renewable diesel Tier one draft in June
- Biodiesel multimedia
  - Final Tier one (date)
  - Final Tier two protocol (date)
  - Tier two results
- Durability study
- Engine testing CeCERT
- TRU testing update
- Chassis testing MTA
  - In-depth testing for C15 and upon availability MBE4000

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## Comments from First Workshop

- ***Literature Review***
  - Clarify and expand NOx impact of biodiesel use.
  - CARB's findings on NOx vs literature (esp. B5)
  - What is the NOx impact at low blend levels?
- Fuel Properties
  - Biodiesel Feedstock Effects
  - Gas To Liquid (GTL) diesel
  - GTL and renewable diesel properties
- Certification

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## Literature Review

### Historical Perspective

#### Biodiesel program

- What did we know about the NO<sub>x</sub> impact of biodiesel use when we started the biodiesel program in 2006?
  - EPA Draft Technical Report
- What was the reason for the CARB study?
- What do we know now?
- What are the next steps?

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## Literature Review

### Historical Perspective

#### What did we know about the NO<sub>x</sub> impact of biodiesel use at the start of the biodiesel program?

- Main reference was the EPA Report on the biodiesel impacts on exhaust emissions
  - Comprehensive review of the literature
  - Analysis of impacts based on base fuel, feedstock, engine class, etc.

"A Comprehensive Analysis of Biodiesel Impacts on Exhaust Emissions" Draft Technical Report EPA420-P-02-001, October 2002 (Draft Technical Report)

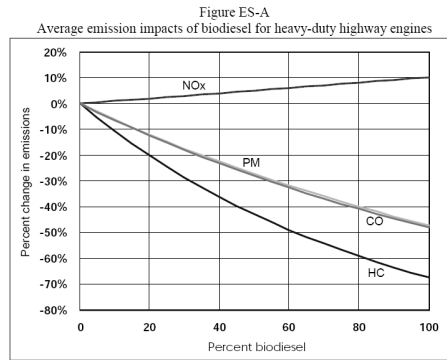
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# Literature Review

## Historical Perspective

Figure from Draft Technical Report cited when discussing the NOx impact from biodiesel



- 2% increase at B20 and 10% increase at B100
- Over all diesel base fuels

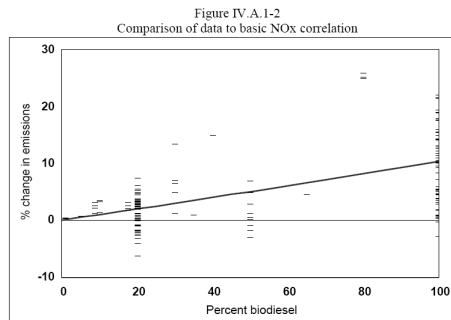
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# Literature Review

## Historical Perspective

Not discussed as often is the scatter in the NOx trend line.



- To explain the range of results, EPA evaluated the effect of various factors such as base fuel and duty-cycle load effects

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# Literature Review

## Historical Perspective

### EPA Base Fuel Analysis

Table III.C.2.e-1  
Base fuel emission group proposed definitions

A. All base fuels to which biodiesel is added are assigned to the "average" emission category for the purposes of estimating emission benefits of biodiesel using the correlations in this report, unless
B1. The base fuel in question meets the requirements for highway diesel fuel sold in California or alternative requirements that are substantially similar to those in California, or
B2. The fuel in question meets all of the following conditions: <ol style="list-style-type: none"> <li>1. Total cetane number is greater than 52</li> <li>2. Total aromatics content is less than 25 vol%</li> <li>3. Specific gravity is less than 0.84</li> </ol>
For fuels meeting conditions B1 or B2, the base fuel should be assigned to the "clean" category.

- Selection criteria for base fuel analysis

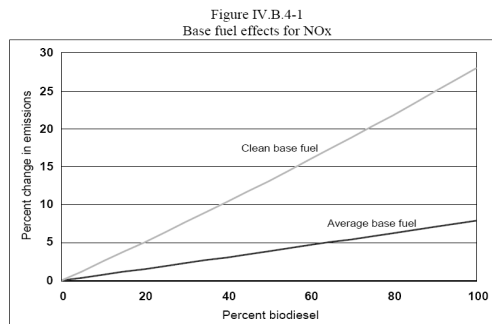
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# Literature Review

## Historical Perspective

EPA found NOx increases more when biodiesel is blended with clean base fuels (e.g., CARB/CARB-like diesel) than with average base fuels



B100: ~27% more NOx than clean diesel, ~7% more NOx than avg. diesel.  
 B20+clean diesel: ~5% more NOx than clean diesel alone  
 B20+avg. diesel: ~2% more NOx than avg. diesel alone

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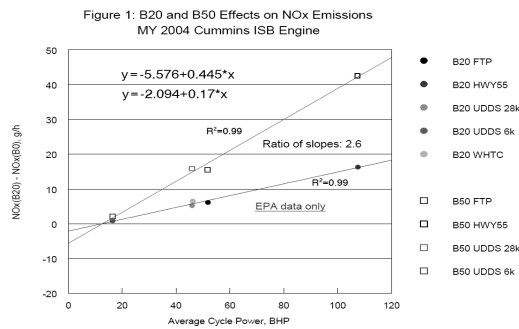
# Literature Review

## Historical Perspective

Another finding by the EPA showed that biodiesel effects on NOx emissions were related to average cycle power

<sup>1</sup>Sze et al, 2007<sup>1</sup>

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# Literature Review

## Historical Perspective

### ■ Why was CARB Biodiesel/Renewable diesel study initiated?

- EPA finding that biodiesel blended with CARB base fuels show a higher percent increase in NOx
- Expand limited data set especially newer technology engines
- Expand limited data set on low biodiesel blend levels
- Need for more robust studies
- Run duty-cycles of different loads

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# Literature Review

## What do we know now?

- CARB study results
- Literature reviews
- Current literature

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# Literature Review

## What do we know now

- **CARB biodiesel/renewable study results**
  - Study on-going, estimated completion date Sept. 2010
- Preliminary results
  - CARB study also shows higher NOx impact for CARB base fuels
  - Continue to refine the information as the study nears completion
  - Matches with other research showing base fuels have a significant impact

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# Literature Review

## What do we know now?

### Literature Reviews

- A Comprehensive Analysis of Biodiesel Impacts on Exhaust Emissions, EPA report 420-P-02-001, David Korotney, 2002
- NREL Review, "Effects of Biodiesel Blends on Vehicle Emissions", Fiscal Year 2006 Annual Operating plan Milestone 10.4, R. L. McCormick et al., 2006
- Draft Regulatory Impact Analysis: Changes to Renewable Fuel Standard Program, Appendix A, EPA-420-D-09-001, Zoltan Jung, 2009
- CRC Report No. AVFL-17, S. Kent Hoekman, et al., 2009

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# Literature Review

## What do we know now?

### ■ Reviews Cont

- Of the major literature review studies only the 2002 Draft Technical Report evaluated the effect of clean base fuels

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# Literature Review

## Next Steps

- Review current literature for
  - Trends and mechanism
  - Emissions data low biodiesel blend levels
- Conduct an analysis of clean base fuels
  - CARB diesel base fuels
  - High cetane base fuels
  - Analysis criteria
  - How the analysis results will be reported

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# Literature Review

## Next Steps

### Review Current Literature

- Key examples
  - Eckerle, 2008
  - Sze, 2007
  - Cheng, 2006
  - Thompson, 2010
  - Others?

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# Literature Review

## Next Steps

### Base Fuels Evaluated

- CARB diesel fuels
- High cetane fuels

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# Literature Review

## Next Steps

### Analysis results

- Compare biodiesel NOx impact of CARB base fuels with
  - High Cetane base fuels (23 studies)
  - to all diesels base fuels (114)
  - to EPA study results

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# Literature Review

## Next Steps

### Comparison to other factors that affect NO<sub>x</sub>

- If possible will look at other factors; however,
- Limited by small data set which may preclude the following evaluations
  - Feedstock
  - Engine
  - Heavy, Medium, Light duty vehicles
  - On-road and non-road

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# Literature Review

## Next Steps-Criteria for Analysis

### Selection of studies

- Heavy duty engines, no test engines
- No duplicate studies
- Published in a peer-reviewed journal, by a research center, or company
- Experimental design, no modeled results.

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## **Literature Review**

### **Next Steps-Criteria for Analysis**

#### **Summary of specifications for fuels used for the analysis**

- Base fuel, CN  $\geq$  48, Aromatics  $\leq$  21
- Blend is B5, B10, B20
- Biodiesel is made from feedstocks that are an agriculture crop, like soy, or waste stream, like beef tallow.

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## **Literature Review**

### **Next Steps-Criteria for Analysis**

#### **CARB Baseline Diesel**

- Suggested studies?

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## **Literature Review**

### **CARB Diesel Studies**

- 114 articles on biodiesel emission effects
- Considered studies on biodiesel produced from currently available feedstocks (generally soy, canola, rapeseed, palm, yellow grease, animal tallow)

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## **Literature Review**

### **Comments Requested**

- Specific comments requested on:
  - Methodology of search
  - Selection of CARB representative studies
  - Quality of data

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## Literature Review Discussion

- Questions or Comments?

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## Comments from First Workshop

- Literature Review
  - Clarify and expand NOx impact of biodiesel use.
  - CARB's findings on NOx vs literature (esp. B5)
  - What is the NOx impact at low blend levels?
- **Fuel Properties**
  - Biodiesel Feedstock Effects
  - Gas To Liquid (GTL) diesel
  - GTL and renewable diesel properties
- Certification

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# Fuel Properties

## Overview

- Two components contribute to NOx emissions
  - Biodiesel Feedstocks and Blendstocks
  - Hydrocarbon Diesel
- Goal: specify properties of each component that are predictors of NOx

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# Fuel Properties

## Biodiesel Feedstocks and Blendstocks

- Biodiesel blends have different emissions effects based upon feedstock
  - ARB testing found soy biodiesel increased NOx more than animal tallow biodiesel
  - This result is generally supported in literature

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# Fuel Properties

## Biodiesel Feedstocks and Blendstocks

- Problems associated with use of feedstock to predict NO<sub>x</sub> effects:
  - Biodiesel feedstocks are frequently mixed
  - Multiple feedstock properties account for differences in emissions, including saturation, chain length and branching

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# Fuel Properties

## Biodiesel Feedstocks and Blendstocks

- Can blendstock properties predict feedstock based variation in emissions?
  - Properties of interest:
    - Iodine Number EN 14111
    - H, C and O content ASTM D5291
  - Properties are indicators of saturation, chain length and branching

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## **Fuel Properties**

### **Hydrocarbon Diesel**

- Properties of base fuel affect NOx emissions of the blend
- Higher cetane, lower aromatics and lower density base fuels can reduce or eliminate NOx increase

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## **Fuel Properties**

### **Hydrocarbon Diesel**

- Specifications for the base fuel:
  - Predictive Model:
    - Used by regulated party for compliance; or
    - Used by ARB to determine compliant specifications

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# Fuel Properties

## Hydrocarbon Diesel

- U.S. EPA Unified NOx Model
  - Strategies and Issues in Correlating Diesel Fuel Properties with Emissions
  - <http://www.epa.gov/otaq/models/analyses/p01001.pdf>

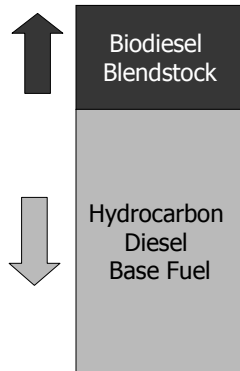
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# Fuel Properties

## Hydrocarbon Diesel

### NOx Trend



### NOx Predictors

- Iodine Number
- C, H, and O content

#### Predictive Model:

- Cetane Number
- Aromatics Content
- Density or API Gravity

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## **Fuel Properties**

### **Hydrocarbon Diesel**

- High Cetane hydrocarbon fuels:
  - Renewable Diesel
    - Simple mixture of hydrocarbons derived from:
      - Hydrotreatment of biological feedstocks
      - Enzymatic reactions of biological feedstocks
  - GTL & BTL
    - Complex mixture of hydrocarbons derived from syngas from fossil or biological sources

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## **Fuel Properties**

### **Comments Requested**

- Specific comments requested on:
  - Biodiesel blendstock properties
  - Hydrocarbon diesel properties
  - Model and specifications

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## Comments from First Workshop

- Literature Review
  - Clarify and expand NOx impact of biodiesel use.
  - CARB's findings on NOx vs literature (esp. B5)
  - What is the NOx impact at low blend levels?
- Fuel Properties
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- ***Certification***

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## Certification Concept

- Emissions equivalent certification based upon certification in diesel rules (13 CCR 2282 g)
  - Issues

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## **Certification Concept**

- Current process uses 1991 DDC Series 60 for testing
- Two primary problems:
  - Engine becoming harder to find in serviceable condition
  - Engine becoming less representative of on-road fleet

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## **Certification Concept**

- Possible modifications:
  - Newer engine for biodiesel certification program
  - 2006 Cummins ISM

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## **Certification Concept**

- Support for 2006 Cummins ISM:
  - No DPF means accurate PM measurement
  - Cummins is largest engine model in California fleet
  - Biodiesel testing conducted on this engine, large amount of data available

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## **Certification Planned Testing**

- Post-rulemaking:
  - Additional testing on mitigation options after rulemaking
  - Testing done to meet requirements of certification, consideration as a certified option

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## Certification

### Comments Requested

- Specific comments requested on:
  - Engine choice
  - Framework

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## Next Steps

- Comments requested Monday, June 21
- Next Workshop (tentatively mid-July)
- Additional Workshops as needed
- Proposal late August
- Board meeting October 2010

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## Contacts

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<http://www.arb.ca.gov/fuels/diesel/altdiesel/biodiesel.htm>

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# Questions & Discussion

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