

## Western States Petroleum Association Comments on ARB October 6, 2014 ADF Workshop

### Request for References

We would like to see the references for the B20 studies that were mentioned at the meeting as well as the ARB's meta-analysis.

### Low NOx Diesel Base Fuel Option

ARB stated it is now proposing to not include renewable diesel as a mitigation option for higher level biodiesel blends, because renewable diesel is being included in ARB's B5/B10 significance threshold. However, WSPA wants ARB to confirm that, in addition to certification of emissions equivalent ADF for NOx mitigation of higher biodiesel blends, a Low NOx diesel base fuel option, such as GTL, will still exist as a mitigation option listed in the Alternative Diesel Fuel regulation.

### NTDE

In the discussion around cost/benefits, ARB needs to take into account that as the NOx mitigation need sunsets with the turnover of the fleet, NOx is not the only thing that becomes fuel neutral. PM, VOC and Toxics are also going to be fuel neutral due to the NTDE's, if not sooner due to DPF retrofits or the 2007 engines with DFPs. At which point, the only benefit that is left to discuss is GHGs.

### B20

There are a couple of clarification items relative to B20:

- One of the proposed exemptions is for B20 in New Technology Diesel Engines (NTDE's). Do blends above B20 in NTDE's require NOx mitigation?
- Also, the program is set to sunset when NTDE penetration reaches 90%. Does the biodiesel blending percentage used in those NTDE's (e.g. B20+) matter?

The proposal is silent on B20+ and ARB needs to address it.

### Reporting

We need details on reporting and enforcement requirements, and would like to investigate any synergies with the LCFS program that may help with resources for both the industry and ARB staff.

### Page Specific Comments

- Page 3 - ARB states that there is a NOx increase of 1.3 tons per day from the use of B1.7. We are confused since we thought NOx impacts from <B5 blends were statistically insignificant (for biodiesel >56 cetane). How did ARB calculate this NOx increase?
- Page 3 – ARB states "... the existing fuels distribution infrastructure can accommodate up to a B5 blend with CARB diesel." We are not sure we agree with this statement, and request further outreach and research by staff to see if all CA terminals operated by the common carrier system are currently configured to blend biodiesel.

- Page 5 – WSPA appreciates ARB’s attempt to raise the safe harbor blending level during the non-ozone season. However, based upon the labeling requirements, we are not sure how useful this will be in practice.
- Page 5 – For clarity, WSPA requests ARB add that blending **at** or below the safe harbor level does not require mitigation: “Safe Harbor” blending <insert “at or”> below the significance threshold without the need for additional NOx mitigation.”