

## **Comment 1 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Judson

Last Name: Cohan

Email Address: jcohan@arb.ca.gov

Affiliation: ARB-MLD-Fuels

Subject: Minor Comments

Comment:

Two minor comments on the draft document:

1. The term "diesel w/o B5" seems needlessly cumbersome. Was "B0", analogous to E0 for gasoline, considered? I have heard this term used at ASTM meetings, though I have no idea how universal it is.

2. Under biobutanol 16%, there is a statement that ASTM has not adopted a standard for this material. I believe that a blend of 16% butanol in gasoline would fall under D4814, and would not need a new standard. If the statement is intended to convey that ASTM has not adopted a standard for butanol as a blending stock (analogous to D4806 for ethanol), then that could be a little clearer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-23 12:06:25

No Duplicates.

## **Comment 2 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: john

Last Name: kulluk

Email Address: jkulluk@torranceca.gov

Affiliation:

Subject: Hydrogen/ urea p 51 and 52

Comment:

1. There are hydrogen pipeline presently in Torrance that transfer hydrogen to various businesses and locations.

2. Urea is a solid and is very difficult to transport via pipeline but certainly could be done using melted urea and insulated pipe.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-23 14:23:21

No Duplicates.

### **Comment 3 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Rick

Last Name: Bandelin

Email Address: rick.bandelin@ventura.org

Affiliation:

Subject: APSA Reference

Comment:

During my initial review of the document, I noticed there was no reference to the above-ground petroleum storage tank act (APSA).

APSA requires owners/operators of above ground petroleum storage tanks with a commutative capacity of 1,320 gallons or greater, to develop and implement an SPCC plan. The Health and Safety Code (HSC) Section 25270.2(g) defines "Petroleum" as crude oil, or a fraction thereof, that is liquid at 60 degrees Fahrenheit temperature and 14.7 pounds per square inch absolute pressure. This definition would include any bio fuel or ethanol blend of gasoline or diesel unless 100% bio or ethanol.

There are no additional APSA or SPCC requirements for storing bio fuels. I just wanted to clarify that bio fuels are still considered a petroleum product and subject to APSA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-25 13:24:28

No Duplicates.

**Comment 4 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Roger

Last Name: Gault

Email Address: rgault@emamail.org

Affiliation: Engine Manufacturers Association

Subject: Cal/EPA Fuel Guidance - EMA Comments

Comment:

Please see EMA Comments attached.

Attachment: [www.arb.ca.gov/lists/fuels-guidance-ws/4-cal-epa\\_fuel\\_guidance\\_comments.pdf](http://www.arb.ca.gov/lists/fuels-guidance-ws/4-cal-epa_fuel_guidance_comments.pdf)

Original File Name: Cal-EPA Fuel Guidance Comments.pdf

Date and Time Comment Was Submitted: 2010-04-20 10:28:39

No Duplicates.

## **Comment 5 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Lucio

Last Name: Vazquez

Email Address: Lucio@igtdo.org

Affiliation: International Green Truck Drivers Organi

Subject: Urgen Comment

Comment:

Dear: ARB

We are the International Green Truck Drivers Organization, we have a clean air plan that includes bio-fuels and additives to clean the air. Different associations have been trying to contact your administration on a response to the situation to occur on April 30, currently we distributing information on how our bio fuels cut pollution drastically and we need to hear from your administration to prepare litigation on behalf of our members. We are announce to the Los Angeles and Long Beach community our effort to clean the air under our possibilities so far we prepare a news conference next week to the newspapers and the media channels and radio stations nationwide, to tell the people the bennefits of the Bio-Diesel, and its been use in different states that came up a 100% success cutting the emmissions down about 98% using Bio-Diesel project, for clean the air of our cities Please contact us as soon as possible for the name of the representative from your board that can answer our questions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-04-20 16:39:26

No Duplicates.

## **Comment 6 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Brian

Last Name: Knapp

Email Address: knappb@api.org

Affiliation:

Subject: Comments related to the Cal/EPA Fuels Guidance Document

Comment:

API suggests that Cal/EPA include the federal regulations that are applicable to the subjects covered in this document as opposed to focusing solely on state regulations. API has included a draft matrix that includes the federal regulations surrounding many of the subjects discussed in Cal/EPA's draft fuels guidance document. The information in this matrix is for discussion purposes only and should not be used for compliance purposes. It should serve as a starting point for Cal/EPA to consider if and when it adds federal regulations to its draft fuels guidance document.

Attachment: [www.arb.ca.gov/lists/fuels-guidance-ws/6-regulatory\\_applicability\\_matrix\\_for\\_e10\\_\\_and\\_biodiesel.pdf](http://www.arb.ca.gov/lists/fuels-guidance-ws/6-regulatory_applicability_matrix_for_e10__and_biodiesel.pdf)

Original File Name: Regulatory Applicability Matrix for E10+ and Biodiesel.pdf

Date and Time Comment Was Submitted: 2010-04-21 08:46:33

No Duplicates.

## **Comment 7 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Scott

Last Name: Negley

Email Address: scott.negley@dresser.com

Affiliation: Dresser Wayne

Subject: Comments on Fuels Guidance Document

Comment:

On behalf of Dresser Wayne I offer the following comments to the referenced document,

-The fuels matrix listed on p.13 has many elements that we question including showing vapor recovery for diesel, CNG, LPG and other alt fuels for which there is either no need or significant technical or regulatory requirements remaining.

-The section for vapor recovery for electricity and urea should be N/A.

-We question the green dot for ARB specification pertaining to E100 and electricity

-Not sure why E85 is listed as red for fueling issues when FFVs are designed accordingly to use a legal fuel.

-E100 should be referenced as N/A for fueling issues since this will not be offered as a retail motor fuel

-Concerned about the green dots in the vapor recovery & dispenser section under Fire Marshal; why is E30 different than E20? Why is diesel with B5 different than without B5? Why are the higher bio-diesels and other alt fuels green on this row?

-Electricity relating to VR and Tanks should be N/A.

-Does the isobutanol category also represent biobutanol?

P.14

-Question the allowable range for E85 considering ASTM is considering lowering the current 70 to 68%. Would like clarification on the 79%-83% window.

-E100 does not necessarily need to be mixed with gasoline. The reference to E100 should be changed to denatured fuel ethanol.

-On specific fuel definitions the percentage noted should include qualifier 'by volume'.

P.19

-Under Metering Systems, the reference to prototype fuel dispensing is not accurate as there are established, approved products for some alt fuel technologies.

P.22

- Under Dispensing Device, indicates that this consists of a power-operated pumping unit which in most cases is not true in CA.

-Under Dispensing Nozzle, reference to gasoline should change to fuel or liquids and not all nozzles return vapors to underground tank.

-Under Impact Valve, it mentions that all such devices have a fusible link when there are some which only feature a mechanical shutoff.

P.23

-Given the changing nature of the fuel supply gasoline vapors

should be referenced as hydrocarbon vapors

-Under vapor assist and balance there is no definition as to whether this includes Phase I or Phase II recovery or both. If Phase II 'dispensing operations' should be replaced with 'vehicle refueling'.

-Under Vapor Processing Unit, the term 'construed interpreted is misleading.

P.24

-Under Vapor Recovery System, the term 'processing' is used which is an active term and probably does not apply to the Healy bladder or small sites which do not require.

P.28

-Under Vapor Recovery, do not understand what 'Phase 3' system means.

-Under Vehicle Issues, FFVs are designed to run on any E85 and any higher blend ethanol.

-Under CAL FIRE -OFSM, E85 product cannot meet CA...should be changed to E85 product has not met CA...

P.29

-Under SWRCB, what is meant that various manufacturers have opted to not obtain such approvals?

P.32

-Under ARB Specifications, it should be noted that ARB had approved the Healy System for E15 so the protocol does exist.

P.33

-Under Vehicle Issues, correct typo of E10 to E20.

P.38

-Under Vehicle Issues, there is no plan to run vehicles on denatured fuel ethanol (E97)...there is a future possibility if approved, of storing underground for blending at dispenser but not to run in vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-04-21 09:23:20

No Duplicates.



**Comment 8 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Gina

Last Name: Grey

Email Address: gina@wspace.org

Affiliation: WSPA

Subject: WSPA Comments on Cal/EPA Fuels Guidance Doc

Comment:

Please find attached WSPA's comments on the draft Cal/EPA Fuels Guidance document.

Attachment: [www.arb.ca.gov/lists/fuels-guidance-ws/8-wspa\\_comments\\_on\\_calepa\\_fuels\\_guidance\\_document.410doc.doc](http://www.arb.ca.gov/lists/fuels-guidance-ws/8-wspa_comments_on_calepa_fuels_guidance_document.410doc.doc)

Original File Name: WSPA Comments on CalEPA Fuels Guidance Document.410doc.doc

Date and Time Comment Was Submitted: 2010-04-21 14:10:23

No Duplicates.

## **Comment 9 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Miles

Last Name: Heller

Email Address: miles.heller@bp.com

Affiliation: BP

Subject: Initial comments on Cal/EPA draft fuels guidance document

Comment:

BP appreciates the opportunity to provide comments on the draft Cal EPA Fuels Guidance Document. BP believes this document will serve as an important reference to inform regulators and stakeholders about impediments and opportunities in bringing new fuels to market. As the regulations referenced and reviewed for the purpose of assembling this document are always subject to change, we suggest that the final document be clearly dated to indicate the time of review.

Because this document provides critically important information that could ultimately affect rulemaking and legislation, BP believes more review is necessary and strongly recommends that either the review period be extended, or a second 60-day review period be provided following any initial revisions that Cal EPA makes to the document. It is important that this document convey as accurate information as possible. We would also ask that the next version be published in a Word format that would enable comments to be directly inserted which should help both of our reviews.

In the last 30-days, BP has endeavored to review as much of the document as possible - but with specific focus on the matrix. We have included a spreadsheet version of the matrix with our suggested changes and comments. We have marked this draft because this is a "work in progress" and we were not able to review all of the regulatory aspects for each of the fuels. We have labeled the cells in the spreadsheet where we did not complete our review and anticipate providing additional information during a subsequent review period. Note that we are suggesting that the document include a review of the federal regulatory and other national code impacts as well (see supporting matrix tab).

The focus of BP's submittal is the matrix, but BP has also provided comments through WSPA. We view the submittals as complementary.

Thank you again for the opportunity to comment and please contact me with any questions.

Attachment: [www.arb.ca.gov/lists/fuels-guidance-ws/9-preliminary\\_bp\\_comments\\_on\\_the\\_ca\\_alt\\_fuel\\_matrix\\_v3a.xls](http://www.arb.ca.gov/lists/fuels-guidance-ws/9-preliminary_bp_comments_on_the_ca_alt_fuel_matrix_v3a.xls)

Original File Name: Preliminary BP comments on the CA Alt Fuel Matrix v3A.xls

Date and Time Comment Was Submitted: 2010-04-21 14:38:51

No Duplicates.

## **Comment 10 for Fuels Guidance Document (fuels-guidance-ws) - 1st Workshop.**

First Name: Jacquelyn

Last Name: Button

Email Address: jbutton@cafcp.org

Affiliation: California Fuel Cell Partnership

Subject: Comments on Cal/EPA Draft Fuel Guidance Document

Comment:

Thank you for the opportunity to review the Cal/EPA Draft Fuels Guidance Document. CaFCP recognizes the hard work that went into this document and appreciates the chance to provide input. We suggest the following sections be updated with current information as follows:

1. Section II, Fuel Matrix: There is a hydrogen pipeline in Southern California.

[http://www1.eere.energy.gov/hydrogenandfuelcells/pdfs/hpwwg\\_airprod\\_remp.pdf](http://www1.eere.energy.gov/hydrogenandfuelcells/pdfs/hpwwg_airprod_remp.pdf)

2. Section III, Fuel Definitions: The industry accepted fuel standard for fuel cell vehicles is SAE J2719:

[http://www.sae.org/servlets/productDetail?PROD\\_TYP=STD&PROD\\_CD=J2719&HIER\\_CD=T EVFC&WIP\\_SW=YES](http://www.sae.org/servlets/productDetail?PROD_TYP=STD&PROD_CD=J2719&HIER_CD=T EVFC&WIP_SW=YES)

3. Section IV, H2 Requirements: Hydrogen is produced economically on a commercial scale. The DOE has reported that delivered hydrogen produced from natural gas can meet the cost target of \$3/gge.

[http://www.hydrogen.energy.gov/pdfs/review08/pd\\_0\\_dillich.pdf](http://www.hydrogen.energy.gov/pdfs/review08/pd_0_dillich.pdf)

4. Section IV, H2 Requirements: CDFA is planning to reference the ASTM quality methods, some of which have been published, others are under development with an expected publish date of 2010.

<http://www.astm.org/COMMIT/SUBCOMMIT/D0314.htm>

5. Section IV, H2 Requirements: The Cal Fire section appears to be cut and pasted from the Liquid Biogas section. CaFCP recommends referring to the ICC and NFPA codes (NFPA 55, NFPA 52) pertaining to hydrogen.

Please find our comments in the attachment as well.

Attachment: [www.arb.ca.gov/lists/fuels-guidance-ws/10-20100421\\_fg\\_comments.docx](http://www.arb.ca.gov/lists/fuels-guidance-ws/10-20100421_fg_comments.docx)

Original File Name: 20100421\_FG\_Comments.docx

Date and Time Comment Was Submitted: 2010-04-21 15:59:13

No Duplicates.

**There are no comments posted to Fuels Guidance Document (fuels-guidance-  
ws) that were presented during the Workshop at this time.**