**STATE OF CALIFORNIA**

**AIR RESOURCES BOARD**

**Proposed Regulation on the ) Agenda Item 15-2-3**

**Commercialization of New Alternative ) Proposed 15-Day Changes**

**Diesel Fuels ) Comment Deadline: June 8, 2015**

 **)**

**COMMENTS OF THE**

**TRUCK AND ENGINE MANUFACTURERS ASSOCIATION**

**June 8, 2015 Roger Gault**

 **Truck and Engine Manufacturers Association**

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On May 22, 2015, the California Air Resources Board (“ARB”) published a “Notice of Public Availability of Modified Test and Availability of Additional Documents. Proposed Regulation on the Commercialization of New Alternative Diesel Fuels” [CCR, Title 13, Chapter 5, Article 3, Sub article 2, Sections 2290, 2291, and 2293] (the “15-Day Changes”).

The Truck and Engine Manufacturers Association (“EMA”) is the international trade association that represents the interests of the world’s leading manufacturers of compression ignition engines used in both on-highway and nonroad products that will utilize the fuels covered by the Proposal.

ARB should make several revisions to the 15-Day Changes prior to its adoption as a Final Rule.

First, EMA recommends that, based on the 15-Day Changes, ARB adopt a definition for “additive” such that fuels approved by ARB under Stage 1, Stage 2, Stage 3A, or Stage 3B per the proposed regulation are not substantially changed through additization. Based on the revised definition of “Hydrocarbon,” for example, there is a potential that fuels will not consist of hydrogen and carbon exclusively.

Second, EMA recommends that ARB consider EMA’s original comments, which have not been incorporated into the 15-Day Changes. Specifically, EMA recommends that ARB:

1. Establish, in writing, a process that ARB will utilize to determine that 75% of engine manufacturers have accepted a Stage 2 fuel.
2. Define the term “consensus standard” in the Final Rule to clarify that, at a minimum, consensus standards required by the regulation are developed by fuel producers, fuel marketers, engine manufacturers, and users.
3. Clarify that all biodiesel blends greater than B20 are Stage 1 fuels that must meet all the Stage 1 and Stage 2 program requirements prior to determination that Stage 3A or 3B is appropriate for those fuels.
4. Delete the option to utilize 0.75% percent DTBP additive treatment in B10-B15 biodiesel blends and the option to utilize 1.0 percent DTBP additive treatment in B15 - B20 biodiesel blends with low saturation biodiesel as NOx mitigation measures.

If you have any questions about EMA’s comments, or would like to discuss this matter further, please do not hesitate to contact us.

Respectfully submitted,

Truck and Engine Manufacturers Association