



Tiffany Roberts

Vice President, Regulatory Affairs

January 25, 2021

California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Comments on CARB Alternative Diesel Fuel Amendments Second 15-Day Notice

On January 12th, 2021, the California Air Resources Board (CARB) released proposed modifications¹ to the Regulation on the Commercialization of Alternative Diesel Fuels (ADF). These modifications were added to the regulation at the request of the Board to provide the Executive Officer the discretion on both the number of laboratories required for certification testing, and lower renewable diesel blend ratios for approved ADF formulations. Western States Petroleum Association (WSPA) is a non-profit trade association that represents companies that export for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states. WSPA appreciates this opportunity to provide comments on the proposed second 15-Day Modifications² to the ADF regulation.

Appendix 1 of Subarticle 2, Subsection (a)(2)(J) – Certification Date

WSPA supports extending the date by which NO_x control additives have to be recertified. WSPA recommended a deadline not sooner than December 31, 2021 in its prior comment letter from October 29, 2020³ and WSPA continues to support this later deadline to allow time for NO_x control additives to be recertified.

Appendix 1 of Subarticle 2, Subsection (a)(1)(B)- Approved ADF Formulations

WSPA requests that CARB allows the use of new formulations pursuant to Appendix 1 (a)(1)(B), with at least 55% renewable diesel and 20% biodiesel, as soon as the new regulation is approved rather than August 1, 2021, as this would help supply a larger volume of renewable fuel with no negative impact on NO_x emissions.

¹ ADF Regulation Second 15-Day Modifications. Available at: https://ww3.arb.ca.gov/regact/2020/adf2020/second15daynotice.pdf?utm_medium=email&utm_source=govdelivery. Accessed: January 2021

² ADF Regulation Second 15-Day Modifications Attachment A. Available at: <https://ww3.arb.ca.gov/regact/2020/adf2020/second15dayatta.pdf>. Accessed January 2021.

³ WSPA CARB ADF Comment Letter Submitted October 29, 2020. Available at: https://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=adf2020&comment_num=24&virt_num=4. Accessed January 2021.

Appendix 1 of Subarticle 2, Subsection (a)(2)(G)(1)

The proposed regulation includes the following requirement in the process for determining if the tested candidate fuel fulfills the requirements for certification: "The average NOx emissions during testing with a candidate fuel that contains renewable hydrocarbon diesel demonstrate at least a two percent reduction relative to the average NOx emissions during testing with the Diesel Test Fuel". WSPA requests that CARB specifies the expected content of renewable hydrocarbon diesel in a test fuel used pursuant as the proposed language is vague.

Conclusion

Thank you for consideration of our comments. We would welcome the opportunity to discuss these ideas in more detail. If you have any immediate questions, please feel free to contact me at troberts@wspa.org. We look forward to working with you on these important issues.

Sincerely,

A handwritten signature in blue ink that reads "Tiffany Roberts".

Tiffany Roberts
Vice President, Regulatory Affairs
Western States Petroleum Association