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From: Mary Solecki <msolecki@ajw-inc.com>

Sent: Monday, August 10, 2020 5:29 PM

To: Kersnar, Evan@ARB <Evan.Kersnar@arb.ca.gov>

Cc: Caelin MacIntosh <cmacintosh@ajw-inc.com>; Leeor Alpern
<lalpern@worldenergy.net>

Subject: Re: Follow up email for Hector

Dear Hector,

We appreciated your time to catch up about World Energy's renewable fuel plant in Paramount. Looking forward to keeping you updated as the expansion project proceeds.

To address a specific question you had about how renewable diesel (RD) may/may not affect the upcoming Omnibus NOx rule, we did a little checking, including with the engine experts over at MECA. Essentially, while there are no studies on renewable diesel in the 0.02 NOx engines, based on all existing data there is strong reason to believe that at a minimum RD would perform the same as petroleum diesel, and possibly reduce NOx in the enhanced 0.02 NOx-compliant engines.

We know that today RD reduces NOx in comparison to petroleum diesel, but that is in comparison to today's engines that only have the selective catalytic reduction (SCR) running when the engine comes up to temp. Of course, during those cold cycles & low speeds are when the vast majority of the NOx emissions occurs, which is where RD shines. In the 0.02 NOx engines as proposed in the Omnibus, the SCR system will be operating virtually all of the time. Since the engine will do such a good job of cleaning up the NOx, it may negate some of the benefit of RD in comparison to petroleum. However, RD will be fully usable in these improved engines and will still retain its significant GHG benefits. Let us know if you'd like any further discussion on this point.

We appreciated the rest of our discussion with you and will be following up on your recommendations.

Best to you,

Mary, Bryan and Leeor
World Energy Paramount