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Imperial Western Products, Inc.

January 26, 2021

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CABA and NBB Comments on the Proposed Amendments to the Alternative Diesel Fuels Regulation

Dear Chair Randolph and Members of the Board:

Thank you for the opportunity to comment on the proposed modifications released January 12, 2021, to the Alternative Diesel Fuels (ADF) regulation. Imperial Western Products (IWP) has been at the vanguard of the biofuels industry since 2001. IWP produces low CI biodiesel from used cooking oil in Coachella, CA. As a long time champion of both Federal (RFS) and State level (LCFS) programs, we appreciate the Board's work on pushing California towards its environmental goals.

The extended phase out date from April 1, 2021 to August 1, 2021 for currently certified NOx additives and formulations is a step in the right direction, but this additional time will only delay the problems that will be faced by many in the Biofuels industry. I can state that IWP's current vendor for the NOx additive has ceased production on their additive and will not have additional volumes available. This will essentially end discretionary blending above the seasonal blend allowances well before August 1, 2021.

IWP along with other California producers and distributors outlined this exact problem in our original ADF Comments that were submitted on April 22, 2020. Since that time, the scenarios in those comments have been playing out just as predicted. These issues, along with staff adding a 2% NOx reduction requirement that was never considered by the board and appears to be completely outside the scope of the rulemaking, would lead to IWP's recommendation that CARB rescind the proposed January 12, 2021 modifications and actively work with stakeholders to find an equitable solution to the problems in this rulemaking.

The biomass-based diesel industry has been and will continue to be an integral part of California's climate goals. We look forward to further engagement with the CARB to find a solution to these matters.

Sincerely,

A handwritten signature in blue ink that reads "Eric Kayser". The signature is stylized and includes a horizontal line extending to the right.

Eric Kayser
Imperial Western Products
Biodiesel Division Manager