



February 24, 2020

Alexander "Lex" Mitchell
Manager, Emerging Technology Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Potential ADF Amendments

Dear Mr. Mitchell,

Thank you for the opportunity to comment on the proposed amendments to the regulation on the commercialization of alternative diesel fuels.

Our comments align with those previously submitted by the National Biodiesel Board, and as such will be brief.

- The certification requirement of duplicate emissions testing at two independent labs is unsubstantiated and should be reconsidered.
 - CARB staff has not provided evidence to support the requirement nor the implicit assumption that labs used to date are unreliable.
 - There is no precedence in any other CARB-required fuel testing for a two-lab test requirement.
 - If the validity of previous testing is in question, the proper approach is round-robin testing in which the same fuels, test procedures and method are followed by different laboratories.
 - Duplicate testing doubles cost. As a result, barriers to entry are raised for additives that could reduce NOx emissions. This not only increases cost as a result of reduced competition, but also introduces a very real risk of not having any vendors remaining if the few market entrants have production issues or go out of business.

We appreciate the opportunity to comment and discuss this comment further in the March 26th meeting.

Thank you,
Steve Bond
Crimson Renewable Energy