

From: George Lin

Sent: Monday, January 31, 2022 1:39 PM

To: ARB Alternative Diesel Fuels

Subject: Comments for: Low Emission Diesel (LED) Study: Biodiesel and Renewable Diesel Emissions in Legacy and New Technology

To whom it may concern,

I am responding with comments to CARB's Notice "Low Emission Diesel (LED) Study: Biodiesel and Renewable Diesel Emissions in Legacy and New Technology Diesel Engines".

The off-road NTDE and fuel configurations tested by ARB may not be indicative of results from other engine models or ratings. Based on a review of the test data compiled by CARB and considering the differences in fuel characteristics between the BD/RD test fuels and commercial diesel fuel, we anticipate that if the same tests were conducted with a higher engine rating within the same family, the emissions results would show less NOx difference for the R65/B35 and R50/B50 blends compared with the CARB reference fuel.

I would be happy to discuss further details with you.

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