

Jim Lyons

From: Jim Lyons
Sent: Wednesday, February 18, 2015 11:32 AM
To: 'Mitchell, Alexander (Lex)@ARB'; 'Aguila, Jim@ARB'
Cc: 'cotb@arb.ca.gov'; 'Sideco, Katrina@ARB'
Subject: Comments on the LCFS and ADF rulemaking proposals
Attachments: BioDieselNOxAssessment20150210.pdf; Statistical Analysis; Sharp_20150218_111952_0000d3b16c98.pdf

Jim and Lex:

I have discovered that one attachment to my Declaration included in electronic filing for Growth Energy that Josh Wilter of my staff made yesterday was not included in the upload. I am enclosing the attachment here. The contents of this attachment do not differ from the content of my Declaration, and the bulk of the analysis in the attachment was provided to the ARB staff on October 24, 2014 as workshop comments. That email is also attached.

Jim Lyons

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From: Jim Lyons
Sent: Friday, October 24, 2014 6:38 AM
To: Scheehle, Elizabeth@ARB; amitchel@arb.ca.gov; Aguila, Jim@ARB
Cc: rincon-ranch@earthlink.net
Subject: Statistical Analysis
Attachments: BioDieselNOxAssessment2014.pdf; Biodiesel Emissions Analysis TechnicalSummary 102014.pdf

Please find attached a slide deck and short narrative describing the statistical analysis performed by Robert Crawford of Rincon Ranch Consulting that I summarized during my presentation at Monday's ADF workshop. Please direct any questions regarding the work to Robert who is copied on this email. As was also discussed on Monday, I request that these materials be posted along with the other materials from Monday's workshop on the CARB website.

Thank you.

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From: Jim Lyons
Sent: Wednesday, February 18, 2015 3:37 PM
To: 'Mitchell, Alexander (Lex)@ARB'; 'Aguila, Jim@ARB'
Cc: 'cotb@arb.ca.gov'; 'Sideco, Katrina@ARB'
Subject: Comments on the LCFS and ADF rulemaking proposals

Jim and Lex:

Just wanted to let you know that we'll be filing the report in hard-copy form tomorrow at the hearings. We tried to file a hard copy version today with the Clerk of the Board, but were instructed instead to bring hard copies tomorrow to the hearing room for filing.

I'd only planned to bring two copies tomorrow (one for each rulemaking file based on my conversation today with Steve Adams) as we don't plan to offer oral testimony on this issue and therefore don't plan to ask that the report be handed around to the Board members. However, please let me know if you'd like me to bring hard copies for you. If you were able review to our October 24 post-workshop comments that were submitted to you then as part of the ADF rule development process, you've already seen the Rincon Ranch analysis of the biodiesel test data and the related literature, which I had summarized at the October 20 workshop. The only new thing in this version of the report is the NTDE discussion, which is also covered in my Declaration that was filed yesterday.

Jim Lyons