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February 22, 2010

Mr. Dean Simeroth and Mr. Lex Mitchell
California Air Resources Board
1001 "I" Street
Sacramento, CA 98512
Via electronic mail to dsimerot@arb.ca.gov and amitchel@arb.ca.gov

Re: National Biodiesel Board Comment on draft regulatory concept for Biodiesel and Renewable Diesel Standards in California

Dear Dean and Lex:

From the January 20 workshop, it is clear that CARB staff has a desire to move from the data acquisition phase of the Biodiesel and Renewable Diesel Study into the decision making phase. While we believe it is premature to move to the decision making phase at this point, we have taken the time in our cover letter to frame out the overall effort from our perspective so that the rationale for many of our suggestions and comments can be more clearly understood by those who have not been intimately involved with the effort. Our specific and detailed comments are attached.

There is a substantial amount of existing data on the emissions and use impacts of biodiesel and biodiesel blends. There is more data, in fact, than exists on any other alternative diesel fuel and perhaps more than any other alternative fuel.

In previous existing emissions testing work, which was heavily weighted with 2 stroke urban bus engines due to the early interest in that application for B20 blends, B20 blends showed on average a slight NOx increase compared to EPA diesel in engine dynamometer testing using EPA Federal Testing Procedures. Some values went up while some went down, but on average there was a NOx increase of approximately 2%. Even though individual results may vary, this value was utilized by NBB and the biodiesel industry as a good approximation for the overall impact of B20 in the market. Over the years, the 2 stroke engines have been mostly replaced with cleaner 4 stroke engines, and more in-use testing and chassis dynamometer testing has become available. Based on this more recent information, there is growing evidence that B20 in today's existing fleet does not show a statistically measurable impact on NOx, be it positive or negative.

Much of the existing emissions data has been with diesel fuel complying with EPA regulations, however, and not with CARB specified diesel fuel, mainly because of the reluctance of California to embrace diesel technology for its transportation needs due to its emissions profile

vs. other fueling options. It is well known that CARB diesel fuel was designed to lower NOx approximately 5 to 7% compared to the diesel fuel used in other states. Recently, Texas adopted diesel fuel rules analogous to those of CARB for the eastern part of that state. One of the major questions to which CARB desired an answer was whether the recent information showing NOx neutral B20 with EPA diesel would also apply to CARB diesel.

At this same time, California has been encouraging cleaner burning retro-fits to existing diesel engines that can provide emissions reduction levels in the 25% to 85% range for either NOx or particulate matter. These are reduction levels that are not easily achieved by a fuel-only option even at high percentages, so testing lower level biodiesel blends (i.e. B20 and lower) with CARB diesel has not been a national industry priority. As companies certified these new retro-fit technologies for petrodiesel, many of them chose to add biodiesel to their testing matrix and also certify them for biodiesel or biodiesel blends as well as conventional CARB petrodiesel. In some cases, it is possible for high blends of biodiesel to achieve desired PM reduction targets in existing engines without the use of other PM after-treatment technology.

The EPA recently released the final rules for RFS2. Biodiesel has been now been classified as an 'advanced biofuel' providing over a 50% reduction in carbon compared to fossil based diesel fuel--including indirect land use impacts. Values for some biodiesel pathways are even as high as 80%. With domestic annual installed production capacity of over 2.5 billion gallons per year, biodiesel is the ***only domestically produced 'advanced biofuel' available in commercial quantities*** that can be utilized to meet the National RFS2 requirements.

While the science behind indirect land use impacts is still very much in its infancy (and NBB believes the carbon reduction score for biodiesel is in reality much larger than that recently announced by EPA) we believe the National RFS2 will provide an avenue for increased biodiesel production over the 700 million gallons of biodiesel produced in 2008. The fact that the biodiesel industry produced and sold over 700 million gallons of biodiesel in 2008—while no other alternative diesel fuel has operational facilities capable of commercial volumes in the US—is a strong indicator that ***today's biodiesel is the most cost-effective domestically produced 'advanced biofuel' for diesel engines***. With increased volumes prompted by RFS2, we believe future biodiesel will also be the most cost-effective option for meeting both the RFS2 and the California Low Carbon Fuel Standard. This puts California in a unique position to be able to capitalize on the jobs and environmental benefits biodiesel can bring to California and to the country, while meeting both LCFS and National RFS2 goals at the same time.

The recent desire (and resulting LCFS legislation) for renewable or low carbon fuels and vehicle technologies that can help mitigate global greenhouse gases and reduce climate change, as well as the large existing domestic installed capacity base, has spurred interest in blending B20 and lower blends in California. EPA's Ultra Low Sulfur Diesel (ULSD) ruling and subsequent requirement of PM and NOx technology that reduces PM and NOx from diesel engines in 2010 by over 90% compared to 2004 year levels has also been instrumental in altering the market potential for new clean diesel vehicles and therefore the market acceptance of petrodiesel. The growing acceptance of clean diesel technology, the inherently higher efficiency and lower overall greenhouse gas impact of diesel engine technology vs. spark ignition (i.e. CNG or gasoline) technology, and the inherently lower life cycle carbon emissions of biodiesel have

given NBB cause to believe California may be a viable long-term market for biodiesel. It is based largely on these factors that NBB willingly agreed to participate with CARB in the Biodiesel and Renewable Diesel Study and to provide $50,000 in cash funding for the effort in addition to several NBB members providing biodiesel for testing.

Early on, it was recognized that the emissions impacts on biodiesel would be beneficial for CO, HC, and PM and that the difference on NOx would be small (i.e. on the order of plus or minus 2% to 5% for B20 blends). This small variation in NOx was also approaching the level of normal variation of engines, test cycle, emissions measurement, and operator to operator and lab to lab variation. Attempts were made to design a test program that would scientifically determine real impacts of biodiesel on NOx at such a low level of difference. It became apparent, however, that the funding available was not going to provide as robust an analysis as was desired. Given the practical funding constraints, a test program was undertaken using both engine and chassis dynamometer cycles—and as many engines—as funding would permit. NBB anticipated that some values would most likely increase for NOx, while other values would most likely decrease for NOx, and that based on all of this information—and other data which could assist the determination—an assessment would be made whether biodiesel blends on average have no measurable impact on NOx, or at what blend level NOx mitigation would be warranted.

CARB is in a unique position of trying to accomplish two human health-related policy initiatives in California at the same time: Keeping the impact of engine/vehicle emissions on human health in California low, while encouraging use of less carbon intensive fuels in those engines/vehicles. California is the first state in the nation to consider adoption of sweeping LCFS regulations, and these regulations are likely to impact the fuels used in California—and other parts of the country—for many years in the future.

With the LCFS beginning in 2011, we understand the relatively short time-frame CARB is now under and how funding constraints and testing delays have limited the ability to provide a data set from which more solid conclusions can be reached. Since this is such a precedent-setting initiative, however, great care should be taken to ensure the specifications set and their implications are thoroughly studied and evaluated. Specifications should be set in the context of both short-term and long-term impacts and not in a way that discourages fuels that can be used to provide the clean burning low carbon fuels in California both now and for many years to come.

It is with the above background, understanding, and rationale that NBB provides our comments attached. We look forward to discussing this with you in more detail over the coming months.

Sincerely,

Steve Howell
Serving as Technical Director
National Biodiesel Board
Cc: Mr. Bob Okamoto, CARB
Mr. Shelby Neal, NBB State Regulatory Director

The National Biodiesel Board provides the following comments to the draft regulatory concept discussed at the Biodiesel and Renewable Diesel Rulemaking Workshop January 20, 2010.

1. We do not believe the information generated and discussed thus far is sufficient to require special NOx mitigation for blends of B5 and lower, or for blends containing between B6 and B20.

2. The current proposal, and any significant discussion of it, is premature. Significant discussion of any proposal at this time is diverting the attention of both CARB personnel and industry stakeholders from further evaluation of the recently released CARB data; review of other recent non-CARB data; and completion of the remainder of the testing needed to get to a valid, scientifically sound conclusion that will stand up to the potential of litigation.

3. ASTM has approved D6751 as the specification for pure biodiesel (B100) for blending. It has also approved up to B5 as a fungible component in conventional petrodiesel, D975, and a separate specification (ASTM D7467) covering blends between B6 and B20. These specifications have been thoroughly vetted through the rigorous, open process used by ASTM which involves engine, user, fuel producer and third party stakeholders' input and voting. ASTM is continually assessing its fuel specifications and improving them over time as fuel production techniques improve and as the needs of engines and vehicles change. Late in 2006, D6751 was changed to add a stability requirement, and late in 2008 it was changed to add additional controls for minor components (through the Cold Soak Filtration Test, CSFT) that could affect filter clogging above the cloud point. As part of the ASTM Biodiesel Task Force, there are ongoing ASTM working groups on stability, cold weather operation, and water and sediment that are actively investigating the potential need for changes in these areas. In fact, ASTM is planning a ballot to further improve some biodiesel to be even lower in minor components due to recent isolated cases of above ground dispensers clogging with high percentages of #1 fuel with some biodiesel that was observed in the field and resulted in a temporary waiver of the use of B5 in #1 fuel in Minnesota this winter.

   CARB coordinated a fleet fuel survey which showed largely positive results, with the expected initial fuel filter plugging upon initial use of B20 in some cases. Experience from other fleets around the country is similar. When switching over to B20, some of the sediment left by petrodiesel over time can become dislodged due to the cleaning effect of biodiesel and result in the initial clogging of filters until the fuel system has been cleaned of the petrodiesel sludge. This is widely known, as outlined in the NREL storage and handling guidelines and the B20 usage guidelines developed as part of the NBB B20 Fleet Evaluation Team (see www.biodiesel.org). The B20 Fleet Evaluation Team was comprised of leading technical representatives from the following companies: Cummins, John Deere, International Truck and Engine Corp, DaimlerChrysler, Caterpillar, Ford Motor Company, General Motors, Department of Defense, Siemens, Delphi Automotive Systems, Volkswagen, Engine Manufacturers Association, MARC-IV Consulting, ASG Renaissance, Bosch, FleetGuard, NREL, BMW of North America, Mack Trucks,

Stanadyne Automotive Corporation, Suncor, CNH Global, Parker-Hannifin-Racor Division, and DENSO International America. CARB requested feedback on biodiesel performance with an emphasis on glycerin impurities, cloud point, stability, and engine impacts. ASTM has approved the existing ASTM specifications for biodiesel in the spirit of providing a fit-for-use fuel up to B20. NBB concurs with ASTM that the ASTM specifications—if properly used and followed—provide a finished biodiesel blend that will provide similar performance as conventional petrodiesel under normal expected use conditions. ASTM is constantly assessing the adequacy of its standards in the market and has in place active mechanisms to improve the specifications if needed.

As indicated in the January 20 workshop, NBB would like to caution CARB on the use of some historical experience with fleets using biodiesel blends. There have been known problems with material falling outside the ASTM biodiesel specifications and other renewable fuels that are not biodiesel and have no specifications but have been confused with and sometimes even labeled as 'biodiesel'. In fuel or fleet surveys, it is to be expected that some use of 'biodiesel' in the past could identify issues beyond the initial clean out of the system, and these issues should not be attributed to biodiesel meeting today's specifications. NBB has worked hard to put into place the BQ-9000 fuel quality program which provides users and consumers with confidence the fuel they purchase from a BQ-9000 company will meet the pertinent ASTM specifications. With today's fuel meeting ASTM biodiesel specifications, users are seeing similar performance as with conventional petrodiesel. At this point in time, over 50% of the engine companies tell customers that B20 meeting ASTM specifications is acceptable in their engines (for a complete list of engine company positions on biodiesel see www.biodiesel.org), including MY2011 models of both Ford and GM, and NBB is working hard to get that number to 100%. Based on all of the above, NBB feels strongly that there is no need for this CARB specification activity to include further analysis of other engine or performance related parameters beyond those for emissions. To do so would be a duplication of the ongoing efforts at ASTM and the industry in general.

4. The original testing plan outlined by CARB should be completed and thoroughly reviewed prior to formalization of specifications. This includes the Tier 2 NOx mitigation study which should include other additives and different concentrations in a wider variety of engines—or in the official Emissions Equivalent Certification engine—than that run by CARB thus far. Sufficient time needs to be provided for this peer review and to allow the information to be evaluated by stakeholders and its implications fully understood and discussed.

5. The data and presentations to be discussed at future meetings should be provided a minimum of 2 weeks in advance of any face to face meeting or conference call to discuss them. It is extremely difficult to have an intelligent, thoughtful, and informed dialog on the material when it is available only hours or minutes prior to the time they are being discussed. Providing the material ahead of time will help to allow the information to be fully understood prior to the meeting so more meaningful questions and dialog can occur at the face to face meetings. In our opinion, allowing for more thoughtful review of this data prior to face to face meeting will, in

6. Further analysis and consideration of existing data—especially data which has become available in the last 6-12 months—as well as the data yet to be completed is needed before formalization of specifications. Recent thorough evaluations by both NREL[1] and CRC[2] have indicated that B20 and lower blends have no statistical difference on NOx than petrodiesel alone. Some values may be slightly higher while some may be slightly lower with the overall effect of B20 on NOx being undistinguishable from conventional petrodiesel. Therefore any impacts on human health due to changes in NOx—be they higher or lower with B20--is so low it will not have measurable impact on the citizens of California. While some of these evaluations have been on EPA diesel rather than CARB diesel, it serves to provide a valid assessment of the variability in lab-to-lab and engine-to-engine testing and the reliability of casting judgment using only a few selected engines run in one laboratory.

7. Additional new theoretical data than that completed under the current CARB study should be taken into account. Significant new fundamental understanding of biodiesel's impact on NOx has been presented by Cummins in a recent SAE paper (2008-01-0078), which concludes, "At B20, the difference in NOx emissions between a biodiesel blend and its base diesel fuel is relatively small, and is less than the difference that can be seen between two commercial diesel fuels within the normal range of aromatics content available in the marketplace." Recent work published by Dr. Charles J. Mueller and Dr. Glen C. Martin (currently employed by Caterpillar Inc.) of Sandia National Laboratories and Dr. André L. Boehman of Pennsylvania State University (SAE 2009-01-1792) also demonstrated a significant increase in the technical understanding of the fundamentals of biodiesel combustion and their impact on NOx. These efforts also show that under certain conditions biodiesel blends may reduce NOx slightly, while under other conditions they may increase NOx slightly. If engines do show a NOx increase this research points out that cetane improving additives, more exhaust gas recirculation, or small engine control adjustments can effectively bring NOx to baseline or even lower—especially if the overall NOx impact is low to begin with. Some post 2004 engines and post 2007 engines may already effectively control B20 NOx using the same control strategies embedded in the engine control strategy to operate on petrodiesel. This may help to explain why recent data is showing both NOx increases and NOx decreases, sometimes on the same engine using the same operator and test cycles. Indeed, this phenomenon appeared to happen in some of the CARB testing.

8. In addition, significant emissions work specific to California was published last fall by Chevron, Cummins and Alameda-Contra Costa (AC) Transit (SAE 2009-01-2649) which studied in-use

[1] McCormick, Robert L. and Yanowitz, Janet; "Effects of biodiesel blends on North American heavy-duty diesel engine emissions", Eur. J. Lipid Sci. Technol. 2009, 11, 763-772

[2] "Investigation of Biodistillates as Potential Blendstocks for Transportation Fuels", CRC Project, No. AVFL-17 Final Report, Prepared by: S. Ken Hoekman, Alan Gertler, Amber Broch, Curt Robbins, Desert Research Institute, Reno, NV 89512, June 2009

impacts of CARB diesel, EPA diesel, B20 and various other fuels. Thorough studies of emissions were also conducted as part of the study, using repeats of well controlled chassis dynamometer testing at facilities of CaTTS laboratory in Richmond, CA who is recognized by CARB as a qualified vehicle emissions testing facility. This data should be given as much weighting as the recent CARB data since the amount of effort and study put into the effort in this paper is on the same order—if not higher—than that of the CARB effort. This papers states, "It can be observed that there is no significant difference between the B20 NOx emissions and its base fuel (either EPA or CARB)."

9. The concept of averaging the impact of biodiesel emissions should be further investigated and entertained by CARB. NBB believes this is the most valid means by which to determine what the overall impact of the use of biodiesel in California. This was the very premise for NBB's participation with CARB and NBB funding of this program.

10. The overall air shed impact of biodiesel should be considered in setting the specifications, especially when considering NOx mitigation options. Previous studies[3] done with air shed models used by CARB indicated a slight overall ozone reduction when using B20 in the entire air shed, even if you assume a 2% NOx increase with B20, while providing advantages for other air toxics. This is largely due to the fact that use of biodiesel reduces un-burned hydrocarbons and both NOx and HC are needed to create ground level ozone. So the true impact on the citizens of California from the direct emissions of biodiesel may indeed be less than that of CARB diesel even considering the slight NOx increase. NBB supports NOx reducing policies for diesel fuels, but for the specific case of biodiesel blends it seems justified that CARB could consider the overall health impacts of biodiesel emissions in their entirety, including the over 50% reduction in life cycle carbon vs. petroleum based diesel.

11. New diesel engines and engine technology should be given increased consideration compared to the discussions thus far. On road diesel engines sold from here forward will have PM and NOx technology that reduce the PM and NOx emissions by over 90% from 2004 year emissions. Due to the relatively low availability of 2010 MY engines and funding limitations, CARB did not test or consider biodiesel's impact on this new technology. Both Ford and GM have recently announced full approval for B20 in their MY2011 diesel applications that employ both PM and NOx technology, and recent testing completed by NREL indicate biodiesel emissions with this new technology are as good or better than petrodiesel or pure hydrocarbon diesel (whether that hydrocarbon comes from renewable or non-renewable sources). Data thus far indicates biodiesel emissions, when used in any concentration up to B100, will not have an impact on vehicle NOx emissions with on-road engines produced and sold after 2010. In fact, there are indications that the emissions profile of biodiesel will provide advantages in the new PM and

[3] Morris, R., G. Mansell, Y. Jia, and G. Wilson 2003b. Impact of Biodiesel on Air Quality and Human Health: Task 2 Report, The Impact of Biodiesel Fuels on Ozone Concentrations, National Renewable Energy Laboratory, NREL /SR-540-33795, May 2003

NOx after-treatment. Oxygen containing biodiesel achieves lower engine out particulates than are possible with petrodiesel or hydrocarbon diesel, and may result in the need for fewer PM trap regenerations which would result in less NOx due to those regenerations.

12. If it is deemed biodiesel in some concentrations may require NOx mitigation solutions for pre-2010 engines, there should be an avenue for new or retrofitted engines with NOx after-treatment to utilize biodiesel meeting D6751 without NOx mitigation.

13. Likewise, if it is deemed some biodiesel requires NOx mitigation for pre-2010 engines, the need for NOx mitigation for biodiesel should expire when diesel engines with no NOx controls have been largely replaced by those with NOx controls.

14. The National Biodiesel Board is feedstock and process neutral. We strongly support ASTM D6751 as a feedstock and process neutral specification and believe that any differentiation of product by feedstock is in-appropriate. Any differentiation of product should be based on physical and chemical properties needed for successful engine operation, not on the feedstock or process used. Petrodiesel has a long precedent for operation in this manner (ASTM D975 does not specify North Sea Brent vs. Alaskan Crude Oil for instance) and this has allowed refiners to utilize their significant expertise to blend and match raw materials and processing to provide products that meet customer and regulatory needs at the lowest cost to California consumers. If NOx mitigation is needed, it should not involve feedstock specification controls. Rather, it should be based on physical or chemical fuel properties, blending options, or additive level.

15. If additives are to be required for NOx mitigation, the additive concentration should be allowed to vary based on the biodiesel concentration. A B6 level fuel should have a lower additive requirement than a B20 fuel for instance. This will allow commercial entities to meet the needs at the lowest cost.

16. If additives are required, sufficient time should be provided for the certification of several additive solutions so as not to induce a monopoly of one additive.

17. If NOx mitigation is needed, we concur it is appropriate for the three routes suggested by CARB staff: Use of additives, blending with the renewable diesel formulation of Neste Oil that was tested (or equivalently specified material), or Emissions Equivalent Certification.

18. For the Emissions Equivalent Certification option, there was talk at the January workshop regarding the engine and testing protocols to be used, with the possibility of selection of a different engine than is current in the regulations. Based on the significant amount of data using the existing regulations (i.e. engine and testing protocols) and the tight timing involved, we highly recommend the existing regulations be utilized by CARB for the purposes of Emissions Equivalent Certification.

19. To the extent such data exists, existing test data using similar CARB protocols should be considered by CARB as acceptable for Emissions Equivalent Certification in lieu of new testing.

20. If a new engine is selected for the Emissions Equivalent Certification, we recommend that engine be the newest available on the market (i.e. 2010 or later technology meeting the EPA mandated 90% PM and NOx reduction level) and that it be selected using similar rational to that used for the current 1991 Series 60 engine. Since this new technology is not sensitive to biodiesel for NOx, any fuel meeting D6751 should be allowed to be used for Emissions Equivalent Certification to minimize the cost of procuring, delivering and blending fuel for testing needs.

21. A path forward for continued use of blends higher than B20 should be investigated. The data available thus far indicates that biodiesel—in any concentration—will have no impact on vehicle NOx emissions that employ NOx after treatment technology meeting the 2010 EPA on-road standards. In addition, various biodiesel blends have already been certified with some NOx after-treatment devices. An avenue for continued use of higher blends, or non NOx mitigated biodiesel blends in approved retro-fit devices, should be allowed in order to facilitate the field experience needed for the adoption of higher blends of biodiesel in the future in California as well as to maintain already existing certification options.

22. Should NOx mitigation be required for low or high level biodiesel blends, a path forward for non-fuel related NOx mitigation should be provided. CARB technical staff has made it clear this type of flexibility is outside the scope of their authority in the current effort. This type of flexibility is, however, clearly within the overall authority of the Air Resources Board and should be considered under a separate effort. NBB is willing to work with ARB to develop such options that would represent realistic non-fuel NOx mitigation options.

23. There is no currently accepted specification or set of properties for 'renewable diesel' or 'biomass based diesel' for either emissions properties or for performance properties. CARB needs to further define 'renewable diesel' or 'biomass based diesel' and a specification for these fuels is needed similar to the specifications available for biodiesel (D6751 for B100 blend stock, D975 for B5 and lower blends, D7467 for blends between B6 and B20). NBB supports acceptance of as many new fuels as possible into D975, as we have stated many times in various meetings and ballots. ASTM Subcommittee E is in the process of determining which new renewable fuels can claim they fall under the current version of D975, but at present biodiesel is the only biomass based diesel fuel that has been formally incorporated into D975. ASTM has not determined which new renewable fuels are adequately specified by the properties of D975 and which will need additional properties and/or a separate specification—similar to that for biodiesel. ASTM D975 does not contain specifications or protections for minor components or other process chemicals which may be present in new renewable diesel fuels that are not present in traditionally processed petrodiesel. It is possible, for instance, for 5% raw vegetable oil to be blended into a D975 diesel fuel and that finished blend will meet all the requirements

of Table 1 of D975 even though such a blend will create serious long term engine problems. It is highly likely that some renewable diesel fuels, such as that provided by Neste Oil for the CARB biodiesel renewable diesel study, will be formally allowed under the existing D975 but the means to do so has not been officially determined and accepted by ASTM at the present time. Acceptance of other renewable diesel fuels under the current D975 without additional controls for minor components or some measure of reaction completion may be less likely for other renewable diesel fuels being considered. Some of these new fuels, for instance, may contain aromatics or levels of un-reacted oils or fats which may be problematic, or which may provide dramatically different emissions than the renewable diesel from Neste Oil tested in the CARB program thus far.

24. We disagree with the proposal presented at the January 20 workshop, 'Renewable diesel is considered NOx mitigated if it meets D975 specifications.' ASTM D975 was based on the existing processes for refining petroleum crude oil into diesel fuel and does not concern itself with emissions impacts sans that of the incorporation of aromatics and sulfur content required by US EPA. The physical and chemical properties outlined in D975 do serve to limit the emissions to a degree, but emissions performance is not part of normal considerations for D975. We agree that the fuel produced by Neste Oil and used in the CARB testing has demonstrated sufficient emissions benefits to be allowed as a renewable fuel under the California LCFS, and may be considered as a blending option or additive for biodiesel. This does not mean that any other 'renewable diesel' will provide the same emissions performance, or that future renewable diesel will maintain the benefits of the Neste Oil type renewable diesel if the only specifications they need to meet are those of D975. D975 does not concern itself with emissions, and if D975 is the only specification a fuel must meet then it follows that the emissions of that fuel could be the same as that of 49 state diesel and not CARB diesel.

25. CARB should conduct a fleet survey of 'renewable diesel users' similar to that conducted for biodiesel to identify the user experience base with renewable diesel. According to CRC, there is significantly less information available about non-biodiesel renewable diesel fuels than biodiesel, and it would be in the best interest of CARB and the consumers of California to understand the implications of the use of other renewable diesel fuels as it has been able to do with biodiesel.