

November 26, 2014

Alexander "Lex" Mitchell
Air Pollution Specialist
California Air Resources Board
Sacramento, CA 95812

Via email to: amitchel@arb.ca.gov

RE: Official written comments on proposed Alternative Diesel Fuel regulation

Dear Mr. Mitchell:

We are submitting these comments regarding the proposed Alternative Diesel Fuel (ADF) regulation presented in October and November of 2014. We are a member of both the California Biodiesel Alliance and the National Biodiesel Board and support their comments.

Whole Energy has been distributing biodiesel and enabling renewable natural gas for several years in California. We began serving customers in the state in 2008. We were attracted to the California market because of its' progressive environment. We are grateful for the support CARB has provided to the clean fuels industry over the last several decades.

The ADF regulation poses a new and potentially un-necessary risk to our business and the growth of our industry and may even undermine all the support that CARB has provided to date. Whole Energy serves many customers that use B20. By restricting blend levels to B5, these customers and our business will be unintentionally harmed and we want to avoid that.

It is likely that NOx impacts from biodiesel will be smaller than expected because the properties and mix of biodiesel and renewable diesel are evolving. The amount of renewable diesel sold in the state has grown by an order of magnitude. Renewable diesel lowers NOx substantially. Two new renewable diesel projects have been funded in this State. The biodiesel mix has also been increasing in cetane. Higher cetane helps to reduce NOx. Whole Energy is working with two new suppliers with a low NOx biodiesel. NOx emissions increases are also being offset by the adoption of Selective Catalytic Reduction (SCR) and through the use of cetane improver fuel additives.

The tools for completely mitigating NOx without a blend ceiling are at our disposal. Our industry and fleets can work with CARB to make sure that after-treatment and fuel formulations fully mitigate B20 NOx in a public-private partnership. Let's work together and make that happen.

Sincerely Atul Deshmane, President Whole Energy Fuels Corp (206-446-1333)

