

From: Brett Maclean
To: Mitchell, Alexander (Lex)@ARB; Guthrie, Jim@ARB; Chung, Susie@ARB; ARB Fuels Program
Subject: FW: ADF Amendment Comments
Date: Friday, December 20, 2019 12:42:28 PM

Hello Lex, Jim and Susie

Following the workshop, here are a few comments from our perspective.

First, to clarify who we are, Targray markets and distributes several million gallons of B99 per month in California.

The vast majority (85%+) is additized for the B20 market, volume which goes to zero in the absence of an approved additive.

While I am not a chemist, some of the comments raised during the workshop seemed like very good ideas:

Reducing variables by having everyone use the same reference CARB diesel and same biodiesel at the same test facility – all components identical except for the additives themselves.

Given my lack of expertise, I have no comment on the concerns around test result repeatability and reproducibility, but based on the comments during the workshop it seemed that the technical guys were not surprised at the variances.

That said, we are very concerned about the amendment timeline.

We have used two different mitigation methods, and the certification process in each case took much longer than the 6 month proposed (re)certification window.

(test protocol submittal/approval, test engine access, reference fuels analysis and approval, data analysis and report submittal, CARB oversight and approvals throughout and final review all take considerable time)

Even if the certification steps could be done in 6 months, real world deployment in the supply chain takes significant time.

When we converted from Catanox to BC-EC1c, the transition took 4 to 6 months across all of our locations – and this is post E.O. for BC-EC1c.

(for what it is worth, the cost difference was significant so we were pushing as hard as possible)

Besides having to manufacture inventory of a newly approved additive, when the treat rates vary dramatically the whole fuel handling infrastructure needs to change.

Going from dosing several thousand ppm to several hundred ppm means different injection equipment and vastly different storage, handling and logistics realities.

Even permitting can become a consideration depending on the SDS and volumes required for reasonable inventory levels.

While we understand (and respect) the requirement to make sure the NOx reductions are real, we trust that you consider the unintended consequences before hastily voiding executive orders and expecting the market to meet an unrealistically optimistic timeline for recertification.

Please feel free to contact me for any additional information or clarification.

Best regards

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