



Thomas A. Umenhofer
Vice President

June 17, 2020

Mr. Lex Mitchell
California Air Resources Board
1001 I Street
Sacramento, California 95814

sent via e-mail at: adf@arb.ca.gov

Re: WSPA Comments on June 4, 2020 CARB Webinar: Potential 15-Day Changes to the Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels

Dear Mr. Mitchell:

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide the following comments pursuant to the June 4, 2020 California Air Resources Board (CARB) Webinar Presentation "Potential 15-Day Changes to the Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (ADF)". WSPA is a non-profit trade association that represents companies that explore for, produce, refine, transport, and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states.

ADF Public Formulation Blend Requirements

As presented in Slide 10 of the CARB staff presentation, the following is proposed:

- Add R55/B20 (2.75:1) as approved formulation for public use
- No certification of formulations lower than R55
- Add triennial program review provision
- Authorize Executive Officer to adjust formulation blend level based on program review

While WSPA appreciates this proposal, we request that CARB provide further information beyond the "Staff Analysis of ADF Public Formulation Blend Levels" Excel file posted with the Webinar Presentation. Specifically, it would very useful to further understand the application of the methodology and results over a wider range of blends.

In addition, CARB should allow formulations that respect a 2.75:1 RD/BD ratio with no NO_x additives (i.e., 27.5% RD and 10% BD should be an acceptable formulation).

ADF Formulations with NO_x Control Fuel Additives

WSPA suggests that CARB allow formulations with a lower than 2.75:1 RD/BD ratio that mitigate NO_x emissions with tested and approved NO_x additives.

We also request that CARB clarify the meaning of "Min. three test facilities must participate" on Slide 15. What is the rationale for requiring the participation of three test facilities? What actions are the three test facilities expected to take? Also, in Slide 17, it is not clear if engines 1 through 4 located at a single test facility or located at different test facilities.

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Timing of Re-Certifications

WSPA is concerned that the increased requirements to certify fuel formulations may result in significant challenges to timely re-certifications. The CARB staff presentation did not appear to address this issue which had been identified in recent stakeholder comments from the December 13, 2019 CARB Workshop. We suggest that CARB allow a minimum of one year after the rule is adopted to recertify the fuel formulations, instead of January 1, 2021.

WSPA appreciates the opportunity to provide feedback on this important issue. If you have any questions, please contact me at (805) 701-9142 or via email at tom@wspa.org.

Sincerely,



Cc: Catherine Reheis-Boyd – WSPA