

**Comment 1 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation: California Fueling LLC

Subject: Comment Submission - Appendix B  
Comment:

Thank you for the opportunity to submit this comment.

Attachment: 'www.arb.ca.gov/lists/com-attach/1-adf2020-UTJTOII+WGZVNIU7.pdf'

Original File Name: Comment Submission - ADF - 01.10.20 - Appendix B.pdf

Date and Time Comment Was Submitted: 2020-01-10 16:28:28

No Duplicates.

**Comment 2 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Comment Submission - ADF - 01.17.20 - RHD Public Formulation & DTBP  
Comment:

See attached document.

Attachment: '[www.arb.ca.gov/lists/com-attach/2-adf2020-VjUBaFQ4WWdRMgRq.pdf](http://www.arb.ca.gov/lists/com-attach/2-adf2020-VjUBaFQ4WWdRMgRq.pdf)'

Original File Name: Comment Submission - ADF - 01.17.20 - RHD Public Formulation & DTBP.pdf

Date and Time Comment Was Submitted: 2020-01-17 08:52:25

No Duplicates.

**Comment 3 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: Pat  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: CARB's Proposed ADF Changes  
Comment:

see attached

Attachment: '[www.arb.ca.gov/lists/com-attach/3-adf2020-VCRcL1Q3VGtSPQdk.pdf](http://www.arb.ca.gov/lists/com-attach/3-adf2020-VCRcL1Q3VGtSPQdk.pdf)'

Original File Name: Public Comment 02.17.20.pdf

Date and Time Comment Was Submitted: 2020-02-17 12:21:15

No Duplicates.

**Comment 4 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: Tia  
Last Name: Sutton  
Email Address: tsutton@emamail.org  
Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments on CARB's ADF Proposal  
Comment:

Attached are comments of the Truck and Engine Manufacturers Association (EMA) on the Proposed Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-adf2020-UDVVPgZmUV1QNQBv.pdf'

Original File Name: EMA Comments on CARB ADF Proposal\_Feb 24 2020.pdf

Date and Time Comment Was Submitted: 2020-02-24 16:59:18

No Duplicates.

**Comment 5 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: Steve

Last Name: Bond

Email Address: sbond@crimsonrenewable.com

Affiliation: Crimson Renewable Energy

Subject: Comment on potential ADF amendments

Comment:

Please see the attached comment.

Attachment: '[www.arb.ca.gov/lists/com-attach/5-adf2020-VDdWlGBoUW9QJQJt.pdf](http://www.arb.ca.gov/lists/com-attach/5-adf2020-VDdWlGBoUW9QJQJt.pdf)'

Original File Name: Crimson Renewable Energy Comment - ADF Amendments.pdf

Date and Time Comment Was Submitted: 2020-02-24 19:09:32

No Duplicates.

**Comment 6 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 45 Day.**

First Name: George

Last Name: Sturges

Email Address: [gsturges@bestenergycorp.com](mailto:gsturges@bestenergycorp.com)

Affiliation: BEST Corp

Subject: Comments regarding Hearing to Consider ADF Amendments

Comment:

Comment regarding Consideration of ADF Amendments

Attachment: '[www.arb.ca.gov/lists/com-attach/6-adf2020-UjBWNQFzWX4AWQdk.pdf](http://www.arb.ca.gov/lists/com-attach/6-adf2020-UjBWNQFzWX4AWQdk.pdf)'

Original File Name: BEST CARB ADF amendments comments.pdf

Date and Time Comment Was Submitted: 2020-02-24 23:54:02

No Duplicates.

**Comment 1 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Eric

Last Name: Kayser

Email Address: ekayser@iwpusa.com

Affiliation: Imperial Western Products

Subject: ADF regulation written comments

Comment:

thank you for the opportunity to address the board. Please find the comments from Imperial Western Products on the uploaded file

Attachment: [www.arb.ca.gov/lists/com-attach/7-adf2020-VzZcPgBnV1sCdIUw.docx](http://www.arb.ca.gov/lists/com-attach/7-adf2020-VzZcPgBnV1sCdIUw.docx)

Original File Name: ADF regulation comments.docx

Date and Time Comment Was Submitted: 2020-04-23 07:50:41

No Duplicates.

**Comment 2 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Rebecca  
Last Name: Baskins  
Email Address: rbaskins@kscsacramento.com  
Affiliation: CA Advanced Biofuels Alliance

Subject: CABA ADF Comments  
Comment:

Thank you for giving us the opportunity to comment on the ADF Regulation.

-Rebecca Baskins

Attachment: [www.arb.ca.gov/lists/com-attach/9-adf2020-AmEHYANgVmQAWVU2.pdf](http://www.arb.ca.gov/lists/com-attach/9-adf2020-AmEHYANgVmQAWVU2.pdf)

Original File Name: CABA Comments on ADF Regulation.pdf

Date and Time Comment Was Submitted: 2020-04-23 07:54:17

No Duplicates.



**Comment 3 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Joe

Last Name: Gershen

Email Address: joegershen@EncoreBIOrenewables.com

Affiliation: Encore BioRenewables LLC

Subject: Encore Comments - Proposed ADF 2020 Regulation

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/13-adf2020-Wj8AaAZkAz8Lfwls.pdf](http://www.arb.ca.gov/lists/com-attach/13-adf2020-Wj8AaAZkAz8Lfwls.pdf)

Original File Name: Encore Comments - Proposed ADF 2020 Regulation.pdf

Date and Time Comment Was Submitted: 2020-04-23 08:17:41

No Duplicates.

**Comment 4 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Scott

Last Name: Hedderich

Email Address: scott.hedderich@regi.com

Affiliation: Renewable energy Group

Subject: Comments on Proposed ADF Amendments (adf2020)

Comment:

please see our attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/14-adf2020-B3UCYVM1AAxVPwZj.pdf](http://www.arb.ca.gov/lists/com-attach/14-adf2020-B3UCYVM1AAxVPwZj.pdf)

Original File Name: REG Letterhead\_FINAL (2).pdf

Date and Time Comment Was Submitted: 2020-04-23 08:24:37

No Duplicates.

## **Comment 5 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Rebecca  
Last Name: Boudreaux  
Email Address: rebecca@oberonfuels.com  
Affiliation: Oberon Fuels

Subject: Comments on Proposed Amendments to the Alternative Diesel Fuel Regulation  
Comment:

Alexander "Lex" Mitchell  
Manager, Emerging Technology Section  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Comments on Proposed Amendments to the Alternative Diesel Fuel Regulation

Dear Mr. Mitchell,

Thank you for your continued work on the Alternative Diesel Fuel (ADF) Regulation. As you may remember, we supported its creation and have followed the evolution of the ADF since enacted. The ADF regulation is important for companies like ours, bringing innovative fuels such as renewable DME (rDME) to market, as the rule provides a pathway by which such fuels can be commercialized. As part of a \$2.9 million California Energy Commission grant initiated in July 2019, Oberon Fuels will be submitting an ADF Stage 1 application prior to the testing of DME-powered vehicles in the next six months.

The potential ADF amendments as proposed raise some concerns. Specifically:

- The sweeping nature of this rule change has no precedence and is inconsistent with other CARB-based fuels, as none are required to undergo double testing. We understand the need to address specific issues with specific fuels and additives. We would suggest that if there are problems specific to certain fuels and additives, those should be clearly identified and isolated in the rule change language so as to avoid unintended consequences for innovative fuels that do not present such concerns.
- While we understand the challenges associated with the fuel blends tested, we are concerned that expanding the testing requirements for fuel additives and formulations as stated could also mean expanded testing requirements for innovative fuels such as rDME. This would add another hurdle for innovative, ultra-low carbon fuels coming to market. In order to move from Research & Development to Commercialization Stage, innovative fuels are already required to overcome numerous testing and market barriers. Adding additional testing requirements could stifle innovation.
- Costs:By requiring two labs to perform the same tests, testing

required would double in costs.

Our request:

- Provide an additional three months for stakeholders to engage with ARB Staff on this topic and collaborate on a remedy that addresses your staff's concerns and our need for flexibility and innovation in these difficult times.

No one wants unintended consequences of modified certification requirements. As such, please consider providing additional time to collaborate with stakeholders like us.

Thank you for your consideration. We look forward to continuing to work with you on the ADF and bringing innovative fuels to market.

All the best,

s/ Rebecca Boudreaux, Ph.D.  
President, Oberon Fuels

Note: .pdf copy attached

Attachment: [www.arb.ca.gov/lists/com-attach/15-adf2020-VjlXMwBkVXRXPI9.pdf](http://www.arb.ca.gov/lists/com-attach/15-adf2020-VjlXMwBkVXRXPI9.pdf)

Original File Name: Oberon Fuels Comments CARB ADF Proposed Changes April 23 2020.pdf

Date and Time Comment Was Submitted: 2020-04-23 08:15:34

No Duplicates.

## **Comment 6 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Jennifer

Last Name: Case

Email Address: jennifer@newleafbiofuel.com

Affiliation:

Subject: Public Comments regarding ADF Amendments by New Leaf Biofuel

Comment:

Good morning to everyone at CARB.

My name is Jennifer Case. I have owned and operated a biodiesel plant here in the disadvantaged community of Barrio Logan in San Diego for the last 14 years. I'm absolutely shocked and very disappointed to have to be here today to oppose these ADF amendments in the midst of a pandemic that has forced our company into the worst economic situation since our founding.

New Leaf was founded as a woman-owned company, started by my friends and I in order to reduce the use of fossil fuels in our beautiful state by producing biodiesel from used cooking oil. Our fuel has enjoyed one of the lowest CIs in the program. Despite our best efforts to contribute to California's goals of reducing Greenhouse Gas Emissions, it seems that every time we turn around, we are fighting another uphill battle for our survival.

Right now, we are in severe economic distress. Our feedstock has dried up and fuel prices are unprecedentedly low. I have spent every day of the last month staring at my financials trying to figure out how to keep my employees working despite this unprecedented time. Despite being one of the smaller players in the space, our employees enjoy high wages, 401ks, free health insurance and a bunch of other benefits that make us a great place to work. But right now, all of that is being threatened. First by the pandemic, and now by these hastily considered amendments that threaten to put a final nail in the coffin of small producers.

If the regulation as proposed is passed, our business will be finished. I'm not being dramatic here.

We do not have the buying power to buy Renewable Diesel and blend it at a high ratio with every gallon of biodiesel we produce. There are only a handful of RD suppliers, and only one very small one in California. The largest RD supplier in the world in Singapore, expressly forbids biodiesel to be blended with its RD for business reasons.

So we are left with only a couple other RD producers that won't even take my phone call. If you insist on making sure that there is a certain amount of RD blended into the fuel supply, GREAT. We support that. But it must be on an aggregate level. It cannot be in each physical gallon. And as others have stated here, the ratio in this proposed regulation is incorrect.

Even if we were able to obtain RD to blend into our fuel, logistically, it would be impossible at every location where biodiesel is currently being used. There simply is not enough RD available, and the state lacks the infrastructure at this point for it to be widely distributed. Furthermore, the 2-lab test is overly burdensome to our industry and imposes far harsher restrictions on testing than the fuel we are mitigating.

We absolutely need more time to work on this. Let us save our businesses from death by pandemic and then work with you on an ADF regulation that we can survive. We all want the same thing here, and I'm sure your heart is in the right place. But the math, science and sales impacts are subject matters that require input and collaboration from all stakeholders. Without our input, you are going to kill us, and in turn, severely harm the LCFS program, which currently gets 20% of its credit generation from biodiesel.

Jennifer Case  
Founder & President  
New Leaf Biofuel, LLC

Attachment: [www.arb.ca.gov/lists/com-attach/16-adf2020-VDVXNQdgWFQEYQJt.docx](http://www.arb.ca.gov/lists/com-attach/16-adf2020-VDVXNQdgWFQEYQJt.docx)

Original File Name: ADF comments - New Leaf.docx

Date and Time Comment Was Submitted: 2020-04-23 08:38:21

No Duplicates.

**Comment 7 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Shelby  
Last Name: Neal  
Email Address: SNeal@biodiesel.org  
Affiliation: National Biodiesel Board

Subject: NBB Comments on ADF Proposed Amendments (adf2020)  
Comment:

For the Board's consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/17-adf2020-UD5TNwRnVloHYghn.pdf](http://www.arb.ca.gov/lists/com-attach/17-adf2020-UD5TNwRnVloHYghn.pdf)

Original File Name: NBB Comments on ADF 4-22-20 with Attachments and Proposed RESO CHANGES (FINAL).pdf

Date and Time Comment Was Submitted: 2020-04-23 09:59:51

No Duplicates.

**Comment 8 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020). (At Hearing)**

First Name: Harry

Last Name: Simpson

Email Address: [hsimpson@crimsonrenewable.com](mailto:hsimpson@crimsonrenewable.com)

Affiliation:

Subject: Opposition to Proposed Amendments to Alternative Diesel Fuels regulations

Comment:

Pls see attached comments from Crimson Renewable Energy related to its opposition to the proposed amendments to Alternative Diesel Fuels regulations

Attachment: [www.arb.ca.gov/lists/com-attach/20-adf2020-UTBXNVQzWVULfwVw.pdf](http://www.arb.ca.gov/lists/com-attach/20-adf2020-UTBXNVQzWVULfwVw.pdf)

Original File Name: ADF Rulemaking\_Crimson Renewable Energy Comments\_042320.pdf

Date and Time Comment Was Submitted: 2020-04-23 10:14:01

No Duplicates.



**Comment 1 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - 10.19.20 - R55 B20  
Comment:

Thank you for the opportunity to submit this comment.

Attachment: [www.arb.ca.gov/lists/com-attach/21-adf2020-B3dUJ1MwU2wBblMw.pdf](http://www.arb.ca.gov/lists/com-attach/21-adf2020-B3dUJ1MwU2wBblMw.pdf)

Original File Name: Public Comment - 10.19.20 - R55 B20.pdf

Date and Time Comment Was Submitted: 2020-10-19 17:36:56

No Duplicates.

**Comment 2 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - 10.19.20 - NOx Mitigant Certification  
Comment:

Please post the attached document. Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/22-adf2020-ViYGdVAzAj0BblQ3.pdf](http://www.arb.ca.gov/lists/com-attach/22-adf2020-ViYGdVAzAj0BblQ3.pdf)

Original File Name: Public Comment - 10.22.20 - NOx Mitigant Certification.pdf

Date and Time Comment Was Submitted: 2020-10-22 15:41:24

No Duplicates.

**Comment 3 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - 10.27.20 - Environmental Analysis Requirement  
Comment:

Please post the attached document for public viewing. Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/23-adf2020-AXEGdV0+AzxVOgVm.pdf](http://www.arb.ca.gov/lists/com-attach/23-adf2020-AXEGdV0+AzxVOgVm.pdf)

Original File Name: Public Comment - 10.27.20 - Environmental Analysis Requirement.pdf

Date and Time Comment Was Submitted: 2020-10-27 12:52:11

No Duplicates.

**Comment 4 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: Western States Petroleum Association Comment Letter

Comment:

Attached please find our comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/24-adf2020-BnFRJFUkWWsGX1c2.pdf](http://www.arb.ca.gov/lists/com-attach/24-adf2020-BnFRJFUkWWsGX1c2.pdf)

Original File Name: WSPA ADF Comments 10292020 FINAL.pdf

Date and Time Comment Was Submitted: 2020-10-29 07:13:59

No Duplicates.

**Comment 5 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Brett, Targray  
Last Name: Maclean  
Email Address: bmaclean@targray.com  
Affiliation:

Subject: Opposition to Proposed ADF Amendments  
Comment:

Thank you for the opportunity to submit these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/26-adf2020-nR6cVrwqTKt5y7Oc.pdf](http://www.arb.ca.gov/lists/com-attach/26-adf2020-nR6cVrwqTKt5y7Oc.pdf)

Original File Name: Comments-on-potential-ADF-amendments.pdf

Date and Time Comment Was Submitted: 2020-10-29 13:24:59

No Duplicates.

**Comment 6 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Tia  
Last Name: Sutton  
Email Address: [tsutton@emamail.org](mailto:tsutton@emamail.org)  
Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments on ADF Regulation 15-Day Notice  
Comment:

Attached are comments of the Truck and Engine Manufacturers Association (EMA) on the "Proposed Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels" Supplemental 15-Day Notice.

Attachment: [www.arb.ca.gov/lists/com-attach/27-adf2020-BTcHMQMwVjUDWIRI.pdf](http://www.arb.ca.gov/lists/com-attach/27-adf2020-BTcHMQMwVjUDWIRI.pdf)

Original File Name: 2020 10 29 EMA Comments - ARB ADF Supplemental 15 Day Notice.pdf

Date and Time Comment Was Submitted: 2020-10-29 13:59:01

No Duplicates.

**Comment 7 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Matt

Last Name: Herman

Email Address: mherman@biodiesel.org

Affiliation: National Biodiesel Board

Subject: National Biodiesel Board Comments on the Alternative Diesel Fuel Regulation  
Comment:

Please find the National Biodiesel Board's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/28-adf2020-VjgBZQNgAw9RNFI9.pdf](http://www.arb.ca.gov/lists/com-attach/28-adf2020-VjgBZQNgAw9RNFI9.pdf)

Original File Name: NBB comments ADF 15-Day Changes 10272020 (FINAL-Signed).pdf

Date and Time Comment Was Submitted: 2020-10-29 14:52:25

No Duplicates.

**Comment 8 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Samuel

Last Name: Bayless

Email Address: bayless@cfca.energy

Affiliation: California Fuels and Convenience Allianc

Subject: CFCA Comments ADF Amendments 15-day Change

Comment:

Please find comments from the California Fuels and Convenience Alliance attached.

Attachment: [www.arb.ca.gov/lists/com-attach/29-adf2020-AmFRMVEzV2ULUlc0.pdf](http://www.arb.ca.gov/lists/com-attach/29-adf2020-AmFRMVEzV2ULUlc0.pdf)

Original File Name: CFCA Comments ADF 15 Day Change 10.29.20.pdf

Date and Time Comment Was Submitted: 2020-10-29 15:20:54

No Duplicates.



**Comment 9 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Rebecca

Last Name: Baskins

Email Address: rbaskins@kscsacramento.com

Affiliation: CA Advanced Biofuels Alliance

Subject: CABA ADF Comments

Comment:

CABA Comments on ADF 15 day

Attachment: [www.arb.ca.gov/lists/com-attach/30-adf2020-VDdXMFY1BDYHXgdk.pdf](http://www.arb.ca.gov/lists/com-attach/30-adf2020-VDdXMFY1BDYHXgdk.pdf)

Original File Name: CABA Comments on ADF Regulation 15 day 10.29.20.pdf

Date and Time Comment Was Submitted: 2020-10-29 16:04:12

No Duplicates.

**Comment 10 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: scott  
Last Name: Hedderich  
Email Address: scott.hedderich@regi.com  
Affiliation: REG

Subject: comments on 15 day Amendments to the ADF  
Comment:

comments on behalf of REG

Attachment: [www.arb.ca.gov/lists/com-attach/31-adf2020-VTRTMQdgWVUEYwlk.pdf](http://www.arb.ca.gov/lists/com-attach/31-adf2020-VTRTMQdgWVUEYwlk.pdf)

Original File Name: ADF amendments Oct 14 final.letterhead.pdf

Date and Time Comment Was Submitted: 2020-10-29 16:24:52

No Duplicates.

**Comment 11 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: scott  
Last Name: Hedderich  
Email Address: scott.hedderich@regi.com  
Affiliation: REG

Subject: comments on 15 day Amendments to the ADF  
Comment:

the enclosed comments were submitted to staff after the June ADF workshop and are enclosed here they are referenced in our Oct 29, 2020 submission.

Attachment: [www.arb.ca.gov/lists/com-attach/32-adf2020-UCIHZAFnAAxQNVU6.pdf](http://www.arb.ca.gov/lists/com-attach/32-adf2020-UCIHZAFnAAxQNVU6.pdf)

Original File Name: REG Comments on ADF Proposed Changes.final.pdf

Date and Time Comment Was Submitted: 2020-10-29 16:33:31

No Duplicates.

**Comment 12 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Nathan  
Last Name: Crum  
Email Address: nathan.crum@vpps.net  
Affiliation: Renner Petroleum

Subject: ADF in Attainment Area  
Comment:

Please see attached letter regarding the 14 day ADF

Attachment: [www.arb.ca.gov/lists/com-attach/33-adf2020-WmhQbwAzUDMKPIBg.pdf](http://www.arb.ca.gov/lists/com-attach/33-adf2020-WmhQbwAzUDMKPIBg.pdf)

Original File Name: 292020 Renner ADF Letter.pdf

Date and Time Comment Was Submitted: 2020-10-29 19:57:55

No Duplicates.

**Comment 13 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-1.**

First Name: Ed

Last Name: Ward

Email Address: ed.ward@vpps.net

Affiliation: Valley Pacific Petroleum

Subject: ADF effect of Biomass Market and Current Air Quality

Comment:

Please see attached letter in response to 14 day ADF

Attachment: [www.arb.ca.gov/lists/com-attach/34-adf2020-W2oCNFRnVD4KPgk5.pdf](http://www.arb.ca.gov/lists/com-attach/34-adf2020-W2oCNFRnVD4KPgk5.pdf)

Original File Name: 10292020 VPPS ADF Letter.pdf

Date and Time Comment Was Submitted: 2020-10-29 20:03:55

No Duplicates.

**Comment 1 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - Proposed ADF Certification Testing Timeline  
Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/35-adf2020-VCRCeLwFiV2gKZVc0.pdf](http://www.arb.ca.gov/lists/com-attach/35-adf2020-VCRCeLwFiV2gKZVc0.pdf)

Original File Name: Public Comment - Proposed ADF Certification Testing Timeline.pdf

Date and Time Comment Was Submitted: 2021-01-20 08:48:22

No Duplicates.

**Comment 2 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - A New Environmental Analysis is Required  
Comment:

Please see that attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/36-adf2020-WytdLgdkWGdWOQFi.pdf](http://www.arb.ca.gov/lists/com-attach/36-adf2020-WytdLgdkWGdWOQFi.pdf)

Original File Name: Public Comment - A New Environmental Analysis is Required.pdf

Date and Time Comment Was Submitted: 2021-01-21 12:55:02

No Duplicates.

### **Comment 3 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Kathleen  
Last Name: Kelcey  
Email Address: kathleenkelcey@att.net  
Affiliation: Air breather

Subject: Diesel fuels  
Comment:

I have copd which means I have trouble breathing. I grew up in L A before smog regulations existed. Prior to LA I live in Minneapolis and we had a coal furnace. In adulthood I taught first grade and my classroom was adjacent to the bus yard. Buses started befor 7:00 am for their 7:30 runs. I was in my classroom at this time most days. In the afternoons the process was similar for the =return trips. Again I was in my classroom. Today I am extremely sensitive to diesel fumes even from the modern diesel vehicles. Please do all you can to limit the poisons emitted. Thank yo u

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-01-22 16:19:34

No Duplicates.



**Comment 4 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: Western States Petroleum Association Comment Letter

Comment:

Attached please find our comment letter - thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/38-adf2020-AnVcKQZ3UGIDWIQ3.pdf](http://www.arb.ca.gov/lists/com-attach/38-adf2020-AnVcKQZ3UGIDWIQ3.pdf)

Original File Name: WSPA CA ADF Comment Letter Draft-01192021.pdf

Date and Time Comment Was Submitted: 2021-01-25 14:00:15

No Duplicates.

**Comment 5 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - Renewable Diesel and Biodiesel Blends  
Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/39-adf2020-UiIHdFEyVmkHaFQ3.pdf](http://www.arb.ca.gov/lists/com-attach/39-adf2020-UiIHdFEyVmkHaFQ3.pdf)

Original File Name: Public Comment - Renewable Diesel and Biodiesel Blends.pdf

Date and Time Comment Was Submitted: 2021-01-25 17:29:20

No Duplicates.

**Comment 6 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Rebecca

Last Name: Baskins

Email Address: rbaskins@kscsacramento.com

Affiliation: CA Advanced Biofuels Alliance

Subject: CABA.NBB ADF Comments

Comment:

Attached is CABA and NBB's ADF comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/40-adf2020-UjFSNQFiUGICKIQ6.pdf](http://www.arb.ca.gov/lists/com-attach/40-adf2020-UjFSNQFiUGICKIQ6.pdf)

Original File Name: CABA.NBB Comments on ADF Regulation 15 day 1.26.21.pdf

Date and Time Comment Was Submitted: 2021-01-26 20:38:23

No Duplicates.

**Comment 7 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Patrick  
Last Name: McDuff  
Email Address: pat@californiafueling.com  
Affiliation:

Subject: Public Comment - Resolution 20-2  
Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/41-adf2020-WipWJVMwUG9XOFU2.pdf](http://www.arb.ca.gov/lists/com-attach/41-adf2020-WipWJVMwUG9XOFU2.pdf)

Original File Name: Public Comment - Resolution 20-2.pdf

Date and Time Comment Was Submitted: 2021-01-27 08:01:36

No Duplicates.

**Comment 8 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Steve

Last Name: Bond

Email Address: [steve.bond@crimsonrenewable.com](mailto:steve.bond@crimsonrenewable.com)

Affiliation:

Subject: Comments on ADF Regulation 15-Day Notice

Comment:

Please see attached comments regarding the ADF Regulation 15-day notice. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/42-adf2020-UDFUNgZhWFRWIgdy.pdf](http://www.arb.ca.gov/lists/com-attach/42-adf2020-UDFUNgZhWFRWIgdy.pdf)

Original File Name: ADF Rulemaking\_Crimson Renewable Energy Comments 012621.pdf

Date and Time Comment Was Submitted: 2021-01-27 11:45:10

No Duplicates.

## **Comment 9 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Jennifer  
Last Name: Case  
Email Address: jennifer@newleafbiofuel.com  
Affiliation: New Leaf Biofuel

Subject: Comments on the Proposed Amendments to the ADF Regulation  
Comment:

Dear Chair Randolph and Members of the Board,

Thank you for the opportunity to comment on the proposed modifications. New Leaf Biofuel operates a small biodiesel refinery in San Diego utilizing recycled cooking oil feedstock. We are members of California Advanced Biofuels Alliance and the National Biodiesel Board, and we second the comments submitted jointly by those organizations regarding these proposed amendments.

New Leaf is very concerned that staff has not addressed the concerns brought up at the April 2020 hearing, specifically regarding the very complicated and costly certification procedures for additive companies.

The additive company that New Leaf is currently using to comply with ADF has indicated that these procedures are too costly and will require them to leave this industry should they be adopted. The other additives on the market are either too costly or too dangerous, and are therefore unworkable. As we have explained to staff numerous times, Renewable Diesel is not available to small companies to meet the compliance obligations either. (A mass balance approach would be a much more workable option). Finally, we are very confused by the new 2% NOx reduction requirement that was not part of the original rulemaking, nor discussed with the stakeholders.

The regulation, as it currently stands, is likely to be a final nail in the coffin for the small biodiesel producers, even with the regulation not being enforced until August. We pride ourselves with having a very good working relationship with CARB regulators. We look forward to continuing this discussion in a way that allows biodiesel to continue to provide the carbon reduction benefits to the State of CA.

Kind Regards,

Jennifer Case  
President  
New Leaf Biofuel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-01-27 13:15:42

No Duplicates.

**Comment 10 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Caelin  
Last Name: MacIntosh  
Email Address: cmacintosh@ajw-inc.com  
Affiliation:

Subject: World Energy Comments on ADF Regulation 15-day Notice  
Comment:

Attached please find World Energy's comments regarding the ADF Regulation 15-day notice - thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/44-adf2020-U2FTZFNiAmBQZFVi.pdf](http://www.arb.ca.gov/lists/com-attach/44-adf2020-U2FTZFNiAmBQZFVi.pdf)

Original File Name: 210127 World Energy ADF Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-01-27 16:34:12

No Duplicates.



**Comment 11 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Ed

Last Name: Ward

Email Address: ed.ward@vpps.net

Affiliation: AB617 Steering Committee Member

Subject: Benefits and Technology

Comment:

Biomass diesel has the potential to immediately reduce emissions in impacted communities. It is important to follow the latest compression engine technology. There are engines that meet tailpipe standards today and the newest tailpipe standards proposed in the near future. The American Lung Association is a partner in 49 states with the National Biodiesel Board. There scientific evaluation is biomass fuel is key to cleaner air. The real question is do other technologies and fuel alternatives have the potential to bring relief today to impacted communities? CARB should be in the business of clean air, not choosing the mythology to get to clean air.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-01-27 16:40:21

No Duplicates.

**Comment 12 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Eric

Last Name: Kayser

Email Address: ekayser@iwpusa.com

Affiliation: Imperial Western Products inc.

Subject: ADF regulation written comments

Comment:

comments in regards to the 15 day change on ADF regulation

Attachment: [www.arb.ca.gov/lists/com-attach/46-adf2020-Vz4Gdwd2WFQHYAAlt.pdf](http://www.arb.ca.gov/lists/com-attach/46-adf2020-Vz4Gdwd2WFQHYAAlt.pdf)

Original File Name: IWP ADF comment letter 1.27.21.pdf

Date and Time Comment Was Submitted: 2021-01-27 17:52:35

No Duplicates.

**Comment 13 for Amendments to the Regulation on the Commercialization of Alternative Diesel Fuels (adf2020) - 15-2.**

First Name: Melinda  
Last Name: Palmer  
Email Address: mhicks@kernoil.com  
Affiliation:

Subject: Comments on Second 15-day Package for ADF2020  
Comment:

Please find Kern Oil & Refining Co.'s comments in the attached letter.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/47-adf2020-B2xVNlckWWRSCwhn.pdf](http://www.arb.ca.gov/lists/com-attach/47-adf2020-B2xVNlckWWRSCwhn.pdf)

Original File Name: Kern Oil Comment Letter 1-27-2021.pdf

Date and Time Comment Was Submitted: 2021-01-27 19:47:00

No Duplicates.