From: Sahay, Shailesh
To: "WIND Cory Ann"
Subject: RE: 2018 Oregon Clean Fuels Proposed Amendments
Date: Thursday, October 04, 2018 06:42:00

Hi Cory – I'm not sure I follow. What we noticed was a difference in denaturant emissions specifically in California versus Oregon. Our question is why the denaturant portion of the ethanol CI is higher in Oregon, when the denaturant used is likely identical in the two states. Do you want to schedule a quick call to discuss? I can grab my emissions modeler to explain the question in more detail.

From: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Sent: Wednesday, October 03, 2018 12:06 PM
To: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Cc: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Subject: <POSSIBLE SPAM> RE: 2018 Oregon Clean Fuels Proposed Amendments
Importance: Low

You are absolutely right. I apologize for the mistake. When Bill and I spoke late yesterday afternoon, he said the difference correlates to the CI of the ethanol in Oregon, which as you know, is much lower for the same pathway due to the difference in ILUC that is attached to corn ethanol in Oregon. Does that make sense?

Cory-Ann Wind
Oregon Clean Fuels Program Manager
wind.cory@deq.state.or.us
503-229-5388

From: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Sent: Wednesday, October 3, 2018 6:51 AM
To: 'WIND Cory Ann' <Cory.Ann.WIND@state.or.us>
Subject: RE: 2018 Oregon Clean Fuels Proposed Amendments

Hi Cory – just following up on this email. It's my understanding that CARBOB is not used as a denaturant. We are the largest denaturant supplier to the ethanol industry, and I believe that the most widely used denaturant is natural gasoline. I don't believe there is a difference in the denaturant that is used for ethanol sold to Oregon rather than California. Happy to get our marketing team on the line to explain if that would help!

From: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Sent: Tuesday, October 02, 2018 1:07 PM
To: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Cc: 'WIND Cory Ann' <Cory.Ann.WIND@state.or.us>
Subject: <POSSIBLE SPAM> RE: 2018 Oregon Clean Fuels Proposed Amendments

Importance: Low

Thanks for the comment. We will take a close look at the model, but my understanding is that the difference in the denaturant value is due to the difference on the gasoline (Oregon does not have CARBOB) side not the ethanol side. I also believe that the OR-GREET 2.0 might have been in error because the adjustment between the gasoline stocks wasn't made. I will confirm this with you after Bill and I take a closer look.

Cory-Ann Wind
Oregon Clean Fuels Program Manager
wind.cory@deq.state.or.us
503-229-5388

From: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Sent: Tuesday, October 2, 2018 8:14 AM
To: 'WIND Cory Ann' <Cory.Ann.WIND@state.or.us>
Subject: RE: 2018 Oregon Clean Fuels Proposed Amendments

Hi Cory,

Thanks again for your consideration of POET's comments on the proposed 2018 Clean Fuels Program update. After the Oregon GREET model was posted online, we noted one additional concern. (Apologies for not getting this to you before Friday, but we had a quite short window to comment after the model was actually posted.)

The denaturant emissions in the proposed Oregon GREET model are 1.35 g/MJ. The denaturant emissions in the CaGREET2.0 model are 0.95 g/MJ. The reason for the discrepancy between the California and Oregon GREET models is not clear from publicly available information. Inasmuch as the sources of ethanol for Oregon are by and large the same as for California, it does not seem to be appropriate that the denaturant emissions for Oregon should be 0.4 g/MJ higher than they are for California. Also, the denaturant emissions in the prior version of the OR-GREET model (OR-GREET2.0) were 0.75 g/MJ, which provides further evidence that the denaturant emissions in the new model may be too high. We request that DEQ reconsider the proposed OR-GREET model's denaturant emissions, and revise the value to align with the proposed CA-GREET model's value of 0.95 g/MJ.

Please let me know if you'd like to discuss further.

Best,
Shai

From: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Sent: Thursday, September 20, 2018 5:53 PM
To: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Cc: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Subject: <POSSIBLE SPAM> RE: 2018 Oregon Clean Fuels Proposed Amendments
Importance: Low

It looks like the webpage to submit comments is working now. Can you please try again.

Cory-Ann Wind
Oregon Clean Fuels Program Manager
wind.cory@deq.state.or.us
503-229-5388

From: Sahay, Shailesh <Shailesh.Sahay@POET.COM>
Sent: Thursday, September 20, 2018 1:20 PM
To: WIND Cory Ann <WIND.Cory@deq.state.or.us>
Subject: 2018 Oregon Clean Fuels Proposed Amendments

Dear Cory,

I attempted to submit comments on the 2018 proposed amendments to the Oregon Clean Fuels Program via the Clean Fuels 2018 webpage, but received the following error:

> There was an error with your submission: Unable to create a row from a form submission because there were insufficient permissions.

As a result, I am attaching POET's comment letter. You can find the referenced Exhibit at the following link. It is too large to transmit as an attachment.

https://poet.box.com/s/tplwl6dcwmljr2hnpe8v0gvm82u4yzgz

I would be more than happy to re-submit via the website if the error is resolved.

Thanks again for your dedicated work on low carbon fuels.

Best,
Shai Sahay

Shailesh Sahay
Senior Regulatory Counsel

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