

### January 1, 2024, Renewable Diesel Requirements

There are questions about the January 1, 2024, requirements to use renewable diesel in non-road vehicles operating in California. The following are answers to some of the most commonly asked questions.

- CARB updated and amended the In-Use Non-Road Diesel Regulation in 2023 to require renewable diesel to be used in off-road fleets including rental fleets beginning January 1, 2024.
- Off-road equipment units are considered vehicles for the purposes of the amended regulation.
- There does not seem to be an exemption for “small fleets”.
- There is a renewable fuel exemption if the whole fleet or “fleet portion” is completely Tier 4 final. Businesses know if they fall under whole fleet or fleet portion definitions.
- Renewable diesel is widely available in California and apparently 50% or so of all California diesel for sale is R99 or R100.
- Renewable diesel price is controlled via credits. Currently, the credit system produces price parity with low sulfur petroleum diesel.
- Renewable diesel meets the same specification as conventional diesel, so the fuels are essentially interchangeable. One apparent issue is the pour point, which creates a problem for renewable diesel in very cold areas. A winter exemption is present in the rule.
- The issue for non-100%-tier 4 final fleets will be record keeping and the need to convert diesel storage on site to R99 or R100 and enforce renewable diesel use by renters using contractual requirements.