

The BP co-processing renewable diesel pathway is a Tier 2 fuel pathway application submitted and evaluated pursuant to sections 95488.1(d) and 95488.7 of the LCFS regulation. The draft discussion paper referenced in the staff summary is relevant to the pathway evaluation only to the extent that it outlines what CARB staff considers a reasonable approach to applying and implementing those provisions of the LCFS through an appropriate GHG accounting and renewable content measurement framework. Pursuant to the Tier 2 evaluation process, BP must respond to comments related to potential factual or methodological errors, and have done so.

CARB agrees with the National Biodiesel Board recommendation regarding imposing an operating condition on the sulfur content of VGO co-processed with tallow. CARB has put an additional operating condition that requires the applicant to report the sulfur content quarterly and adjust the fuel pathway carbon intensity if necessary based on the change in sulfur content of VGO.