



Thomas A. Umenhofer, CCM, REPA  
Vice President

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Mr. Sam Wade  
Branch Chief  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

sent via email: [LCFSworkshop@arb.ca.gov](mailto:LCFSworkshop@arb.ca.gov)

Re: WSPA Comments on CARB 5<sup>th</sup> Refinery Co-Processing Work Group Meeting

Dear Sam,

The Western States Petroleum Association (WSPA) appreciates this opportunity to provide initial feedback on the California Air Resources Board (CARB) presentation at the 5<sup>th</sup> Low Carbon Fuel Standard (LCFS) Refinery Co-Processing Working Session, held on October 19, 2018 in Sacramento, CA. WSPA is a non-profit trade association representing 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.

On January 16, 2017, March 22, 2017, July 5, 2017, and November 9, 2017, WSPA provided feedback on the ARB staff presentations at 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> LCFS Refinery Co-Processing Working Sessions, held on December 13, 2016, February 7, 2017, June 2, 2017, and October 16, 2017, respectively. Therefore, the comments provided below augment that prior feedback.

As this Work Group Meeting focused on <sup>14</sup>C testing, WSPA restates our position from past WSPA comments letters that we believe is shared by CARB that <sup>14</sup>C testing is not an *a priori* requirement in order to quantify the content of biogenic material in the product of co-processed fuels. We believe that a single prescriptive approach could constrain renewable fuels access. As refineries can be very different, flexibility is important due to variations in refinery operations.

We believe that a <sup>14</sup>C test method and a mass balance yield approach should be included as options for co-producers to employ if they should choose to do so. Stakeholders should be given the opportunity to provide supporting evidence of either method's applicability. A mass balance yield approach uses ASTM-approved methods to quantify the effects of processing conditions such as catalytic change and fractionation on a feedstock and resulting products.

In addition, WSPA suggests that CARB consider additional options for a renewable content measurement, such as the aromatics content in diesel fuel. It is recognized that this approach is not an absolute method as some refining processes can saturate aromatics but it could be used as a marker under certain controlled conditions. Markers other than aromatics may be available for different processes or types of renewable product. Further, inventory and receipts/shipments measurements with an established yield model should be an acceptable method to determine the renewable production content.

If you have any questions, please contact me at (805) 701-9142 or via email at [tom@wspa.org](mailto:tom@wspa.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Umenhofer", is written over a white background.