

bp America

Dear Adam, and Ecology Staff.

We appreciate the opportunity to provide some brief comments regarding edits to definitions on the latest draft of the Clean Fuels Standard regulation released on November 26, 2024 which also includes changes made in the August draft.

I will send the comment via email and attach a pdf.

Thank you,

Jim Verburg

## Verburg, James E

---

**From:** Verburg, James E  
**Sent:** Friday, December 13, 2024 5:15 PM  
**To:** Saul, Adam (ECY)  
**Cc:** Dererie, Debebe (ECY); Brown, Abbey (ECY)  
**Subject:** Comment on November 2024 Draft Clean Fuels Standard Rule Language

Dear Adam,

We appreciate the opportunity to provide some brief comments as requested in the December 11, 2024 webinar regarding edits to definitions on the latest draft of the Clean Fuels Standard regulation released on November 26, 2024 which also includes changes made in the August draft.

The August release of the draft rule language made changes to the definition of “Renewable hydrocarbon diesel” or “renewable diesel”. For the definition of “Renewable hydrocarbon diesel”, we recommend keeping most of the previous definition as it makes an important distinction between renewable diesel and biodiesel. In addition, there are other methods beyond hydrotreating (such as hydrocracking or fluid catalytic cracking) that can produce renewable diesel. A suggested edit is provided in **red** below.

(126) "Renewable hydrocarbon diesel" or "renewable diesel" means a diesel fuel that is produced **from the processing (hydrotreating, hydroprocessing or other) of biomass and biocrudes hydrotreated lipids nonpetroleum renewable resources but is not a monoalkylester (biodiesel) and biocrudes** and which is registered as a motor vehicle fuel or fuel additive under 40 C.F.R. Part 79. This includes the renewable portion of a diesel fuel derived from co-processing biomass with a petroleum feedstock.

The August release of draft rule language also made changes to the definition for “renewable naphtha”. While specifying the renewable portion of naphtha fuel derived from “co-processing” biomass is beneficial, we recommend more generalized language around feeds and processing methods using language like the suggested edit in **red** below.

(129) “Renewable naphtha” means naphtha that is produced from **the processing (hydrotreating, hydroprocessing or other) of biomass or biocrudes hydrotreated lipids and biocrudes** or from gasified biomass that is being converted to liquids using the Fischer-Tropsch process. This includes the renewable portion of a naphtha fuel derived from co-processing biomass with a petroleum feedstock. ~~nonpetroleum renewable resources.~~

Please don’t hesitate to reach out if you have any questions. Thank you for considering these suggestions.

### Jim Verburg

Regulatory Advisor · bp  
C&P – Fuel supply & midstream; biofuel value chain  
[james.verburg@bp.com](mailto:james.verburg@bp.com) • (360) 296-0692 cell

