



bp America
1201 K Street, Suite 1990
Sacramento, CA 95814

October 9, 2020

Samir Sleiman
Djay Patel
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Via Email: ghgreport@arb.ca.gov

Re: Comments re: Reporting Emissions from Co-processing of Biogenic Feedstocks in Petroleum Refineries in MRR webinar (September 19, 2020)

Mr. Sleiman and Mr. Patel,

Given the growth in Co-processing activity and bp's ambition to become a net zero company by 2050 or sooner, we take great interest in the development of regulatory incentives that may encourage participation in Co-processing of bio-genic feedstocks. We appreciate the opportunity to provide the following comments relative to Reporting Emissions from Co-processing of Biogenic Feedstocks in Petroleum Refineries.

- **More information on common monitoring practices in refining industry during Co-processing**

bp has chosen to employ ^{14}C testing methodology for co-processed renewable diesel at our Cherry Point, Washington refinery. Having chosen ^{14}C methodology we also recognize that this may not be suitable across the spectrum of potential Co-Processing applications. As such, options beyond ^{14}C , for example mass balancing, should be available in the monitoring toolkit.

- **Should CARB explore methods to report biogenic emissions from finished fuels only? Or also process and combustion emissions?**

bp believes that reporting methods should be explored if a facility can take credit from being able to demonstrate and quantify biogenic components of process and combustion emissions, while safeguarding against double counting.

- **If ^{14}C testing is used for finished fuels, at what frequency should that be done? What inputs would need to be included to demonstrate normal operations?**

We would recommend that CARB mirror LCFS pathway parameters whenever it makes sense to do so. We would also recommend that CARB incorporate a broader range of renewable fuels that may result from Co-processing and that will require emission factors.

- **Should CARB accept alternate methodologies for GHG quantification from different unit types such as FCC and hydrotreaters?**

As described in the first bullet above, bp supports this approach in order that peer reviewed CARB endorsed options can be available.

- **How could measurement accuracy be assured when a refinery project shares metering with other equipment or process units/inputs?**

bp believes that sharing of meters should be allowed with the support of modelling/ allocation methodologies.

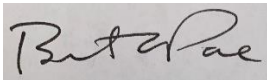
Additionally, if mirroring LCFS, then meter maintenance program compliance to meet state and federal requirements or industry standards should also be considered for MRR.

- **What types of information could be provided to demonstrate accuracy/completeness of the proposed method?**

Measurement, simulation and 3rd party verification all have a part to play for supporting the proposed methodology.

As always, please feel free to contact me if you wish to discuss these comments in more detail.

Sincerely,

A handwritten signature in black ink on a light gray rectangular background. The signature appears to read "Brent A. Pace" in a cursive, slightly stylized font.

Brent A. Pace, P.E.
bp America
Commercial Advisor – Environmental Regulations