From:	Garcia, Oscar
To:	WIND Cory Ann
Cc:	cfp2018; Jessica Spiegel; Bunch, Mark J
Subject:	RE: Clarifying question
Date:	Tuesday, October 02, 2018 14:31:07

Hi Cory-Ann,

The definition of "alternative jet fuel" should be expanded to include all jet fuel that contains renewable components. D7566 contains product quality specifications for the renewable blend components (in the annexes) and the finished fuel. The finished fuel certified as D7566 is then recertified as D1655 jet so that it may be moved through the supply chain and used to refuel aircraft. D1655 jet is actually what is supplied to aircraft. Furthermore, by only specifying D7566, it excludes lipid co-processing which is contained within D1655. Since the goal is to allow lower CI jet fuel to participate in the program, then the definition should include both D1655 and D7566.

We suggest expanding the definition to include D1655 as follows.

(6) "Alternative Jet Fuel" means a fuel, made from petroleum or non-petroleum sources, which can be blended and used with conventional petroleum jet fuels without the need to modify aircraft engines and existing fuel distribution infrastructure. The fuel must meet ASTM D7566 or ASTM D1655.

Thank you,

Oscar Garcia

From: WIND Cory Ann <Cory.Ann.WIND@state.or.us>
Sent: Tuesday, October 02, 2018 11:45 AM
To: Jessica Spiegel <jspiegel@wspa.org>; Garcia, Oscar <Oscar.Garcia@chevron.com>
Cc: cfp2018 <cfp2018@deq.state.or.us>
Subject: [**EXTERNAL**] Clarifying question

Jessica and Oscar,

In reviewing the comments you submitted for the CFP 2018 Rulemaking, I have a follow-up question. You suggest that ASTM D7566 should apply to the finished blended jet fuel (conventional + alternative)…is there a companion ASTM standard that should apply to just the alternative jet fuel?

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