CFP 2018 Rulemaking

Advisory Committee Meeting #4 Summary

July 16, 2018
Portland State Office Building, Room 1D
800 NE Oregon Street
Portland, OR 97232

List of attendees

- Jana Gastellum, Oregon Environmental Council
- Kim Do, White Energy
- Danelle Romain, OFA
- Lindsay Fitzgerald, REG
- Matt Herman, REG
- John Thornton, Clean Future
- Tim Raphael, Strategies 360
- Graham Noyes, Low Carbon Fuels Coalition
- Laura Tocheny, Dalton Advocacy
- Annie Stuart, Coleman Oil
- Brian McDonald, Chevron
- Marc Ventura, Phillips 66
- Jessica Spiegel, WSPA
- Jeremy Martin, Union of Concerned Scientists
- Mark Bunch, BP
- Ian Hill, SeQuential Biofuels
- Jessica Hoffmann, RPMG
- Kendra Seymour, Stillwater
- Megan Boutwell, Stillwater
- Ryan Lamberg, National Biodiesel Board
- Nina Kapoor, RNG Coalition
- Dan Kirschner, Northwest Gas Association
- Cory-Ann Wind, DEQ
- Michael Orman, DEQ
- Bill Peters, DEQ
- Karen Williams, DEQ

List of handouts and presentation notes

- Draft Redline Rules
- Draft Fiscal Statement
- Slides

Summary of input

Review of proposed rule changes

- Change AFRS to AFP throughout
- Transport refrigeration units, not truck refrigeration units



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DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

- Is there an ASTM spec for renewable LPG? Is one needed in the definition?
- Look at CARB's proposed definition for biomass-based diesel to see how it rolled in biodiesel and renewable diesel.
- Look at CARB's LCFS and cap 'n trade requirement for temperature correction. Refer to the method, not the equation.
- The description of the Tier 1 calculator in -0400(6)(a) should probably not refer to "well-evaluated".
- Review -0640 to make sure alternative jet requirements are right.
- There should be an Oregon-specific process for revocation of pathways.
- Table 3, 2025 and beyond should be 90.01, not 89.65.
- Do the changes to OR-GREET reflect newer information about the upstream fugitive methane emissions?
- Need to update Table 9 to reflect the updated gas and diesel CIs for the undefined ethanols and biodiesels.

Fiscal and economic impact discussion

- There might be additional costs to fuel producers for the time to prepare and re-apply for a
 pathway under GREET 3.0. It's probably not significant since most companies have set up
 their records-keeping systems to accommodate GREET and most of the work is quality
 assurance on the data and formatting the application.
- DEQ might see an increase in the amount of enforcement actions since the number of participating parties will increase.
- The additional credit generation lowers the cost of credits and the program due to increased supply.
- Alternative fuel forklifts is a more mature market than TRUs so there will likely be more credits from that sector. But there are eTRU operators that are interested.
- Increased usage of alternative fuels will also have benefits on local air quality in addition to climate change.
- The new substitute fuel pathway codes will make it administratively easier to track the export of blended fuels.

Alternative formats

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