



Washington State Department of Ecology

Establishing Temporary Fuel Pathways Codes and Carbon Intensity Values for Renewable Naphtha and Renewable Gasoline Blendstock

Summary

Pursuant to WAC 173-424-610(11) of, Ecology may approve a new temporary pathway for a fuel or feedstock fuel combination not found in Table 8 of WAC 173-424-900.

Montana Renewables, LLC has requested that Ecology add temporary fuel pathways and carbon intensity (CI) values for renewable naphtha.

This document proposes temporary fuel pathways and carbon intensity (CI) values applicable to renewable naphtha and renewable gasoline based on carbon intensity values approved by the California Air Resources Board (CARB) and Oregon Department of Environmental Quality (OR-DEQ) for similar programs.

Rationale for the Proposed Temporary Pathways Carbon Intensity Values

Renewable naphtha is a renewable gasoline blendstock and a co-product of renewable diesel production. The same feedstocks currently used in biomass-based diesel production are used to produce renewable naphtha. The proposed temporary CI values below apply to renewable naphtha and renewable gasoline blendstock produced from various feedstocks. The proposed CI values are based on the temporary fuel pathways established by the California Air Resource Board's (CARB's) Low Carbon Fuel Standard¹ and the Oregon Department of Environmental Quality². CARB established the temporary pathways based on the most conservative CI values out of the certified renewable diesel pathways that could produce renewable naphtha and renewable gasoline blendstock as a co-product. The resulting CI of the temporary pathway was established by adding five percent on the conservative CI value of the certified RD pathways and rounded to the nearest five CI points. This is consistent with the methodology used to determine the CI values of the existing temporary fuel pathway codes (FPCs) listed in CARB LCFS, OR-DEQ CFP and Table 8 of WAC 173-424-900.

Feedstock	Process Energy	Carbon Intensity gCO ₂ e/MJ
Animal fats, corn oil or waste stream	Grid electricity, natural gas, and/or renewables	45
Plant oils (except palm oil and palm-derived feedstocks)	Grid electricity, natural gas, and/or renewables	65
Any other feedstock	Grid electricity, natural gas, and/or renewables	Baseline CI value for ULSD

¹ https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/newtemp_rnaphtha21.pdf

² <https://www.oregon.gov/deq/ghgp/Documents/cfpRenewNaphthaRev.pdf>

How do I submit a comment?

Please [submit your comments online](#) by **December 17, 2023**.

What happens after the comment period ends?

Ecology will consider all comments received and make changes to the proposed temporary pathways and CI values if appropriate. The final temporary pathways and CI values for renewable naphtha will then be added to the table of approved temporary fuel pathways with FPCs for use by any registered party.

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyADAcordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

Contact

Building Address: 300 Desmond Dr SE, Lacey, WA 98503

If you have questions, please email WFRSAdmin@ecy.wa.gov