



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](#)¹.

Ecology reviewed the request and proposed temporary fuel pathways and carbon intensity (CI) values applicable to renewable naphtha and renewable gasoline blendstock based on carbon intensity values approved by the California Air Resources Board (CARB) and Oregon Department of Environmental Quality (OR-DEQ) for similar programs. The proposal was posted on Ecology's Clean Fuel Standard website for public review and comment from November 2 – December 17, 2023, and one comment was received.

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 Standard² and the Oregon Department of Environmental Quality³. 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://www.ezview.wa.gov/Portals/_1962/Documents/clean-fuel/Temporary%20FPC%20for%20Proposed%20RN%20and%20RG.pdf

² https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/newtemp_rnaphtha21.pdf

³ <https://www.oregon.gov/deq/ghgp/Documents/cfpRenewNaphthaRev.pdf>

Final Decision

Ecology reviewed the public comment that proposed the use of baseline CI value of fossil gasoline instead of ultra-low sulfur diesel (ULSD) for any other feedstock, because renewable naphtha and renewable gasoline blendstock belong to the gasoline fuel category. As the carbon intensity is based on accounting of GHG emissions over the life cycle of the fuel, and renewable naphtha and renewable gasoline blendstock are co-products from renewable diesel production, we decided to use the baseline CI value of ULSD for any other feedstock.

Therefore, Ecology will certify the temporary fuel pathways with proposed carbon intensity values for renewable naphtha and renewable gasoline blendstock, because it is consistent with California Air Resources Board and Oregon Department of Environmental Quality pathways. Issuing these temporary pathways with their carbon intensity values allows fuel production facilities to generate CFS credits from the sale of these fuels in Washington, until they collect sufficient operating data to support provisional and non-provisional pathway applications. The final temporary pathway codes and their carbon intensity (CI) values for renewable naphtha will be added to the approved temporary fuel pathways Table 8 under [WAC 173-424-900](#).

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