

October 24, 2017

Unified Program Agencies (UPAs)
Fuel Marketers, Refiners, and Blenders
Gasoline Producers/Importers
Other Interested Stakeholders

Gasoline Produced from Renewable Blendstocks Should Be Treated the Same as Conventional Gasoline

This is a joint statement by the California Air Resources Board (CARB) and the State Water Resources Control Board (State Water Board) intended to clarify questions that have been raised regarding gasoline made from renewable blendstocks. As discussed below, gasoline that meets the California reformulated gasoline (CaRFG) regulations and ASTM International standard specification D4814, should be treated the same as conventional gasoline for all purposes, including storage in underground storage tanks (USTs) and other regulatory requirements, regardless of blendstock source (renewable or petroleum-based).

This joint statement applies to finished fuel that meets the CaRFG regulations specified in Title 13, California Code of Regulations, sections 2250 through 2273.5, through the use of the California Predictive Model (i.e., "final product predictive model"), as well as ASTM D4814 and the definition of "substantially similar" specified in section 211(f)(1) of the federal Clean Air Act. Any gasoline fuel that meets the above requirements for conventional gasoline should be treated the same as conventional gasoline.

Despite meeting requirements for conventional gasoline, there have been questions regarding the ability of marketers and others to store gasoline made from renewable blendstocks in USTs. We consider any finished fuel that meets CaRFG regulations a conventional gasoline fuel that can be used with existing infrastructure and motor vehicle engines. Accordingly, gasoline that meets the requirements for CaRFG and ASTM D4814 should be treated no differently than conventional gasoline.

Various Stakeholders

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Our staff would be happy to discuss any questions you may have with regard to this letter. Please contact Mr. Floyd Vergara, Chief, Industrial Strategies Division, at (916) 324-0356 or Floyd.Vergara@arb.ca.gov for air-related questions, and Ms. Shahla Farahnak, Assistant Deputy Director, Groundwater Quality Branch, at (916) 341-5737 or Shahla.Farahnak@waterboards.ca.gov for water-related questions.

Sincerely,



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Chief, Industrial Strategies Division
California Air Resources Board



Karen Larsen, Deputy Director
Division of Water Quality
State Water Resources Control Board