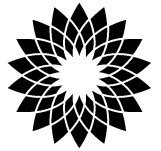




Miles T. Heller

Senior Advisor, Regulatory Fuels Issues

BP West Coast Products LLC
4 Centerpointe Drive
La Palma, Ca 90623-2503



January 10, 2013

Dr. Judson Cohan
California Air Resources Board
9480 Telstar Av.
El Monte, CA 91731

sent via e-mail

RE: Comments on Proposed test Method Updates to CaRFG and Diesel Regulations

Dear Dr. Cohan,

BP is supportive of the proposed updates to the test methods associated with the CARB gasoline and diesel regulations, including adoption of the new method for trace oxygenates in gasoline (ASTM D7754-11).

However, the switch to method D7754-11 requires modification to existing gas chromatograph (GC) equipment as acknowledged in CARB's ISOR and as such, BP requests that CARB allow additional time to make these changes. BP Carson currently operates three GC machines for such testing in California and other western states. As a result of the proposed regulatory modifications, BP anticipates modifying one of these machines and purchasing two additional GCs for use with the new CARB method. This will provide enough machines both for running the new method for California and running the D4815 method for other jurisdictions, and avoid the potential for 3rd-party laboratory analysis. Obtaining approval for the related capital and subsequent procurement requires additional time. BP estimates approximately 5-7 months for capital approval and procurement with an additional 1.5 to 2 months for set-up, training, and validation. BP requests that CARB allow 9 months following OAL adoption to accommodate equipment changes required by the new method.

In addition to the timing requested for this particular test method, BP requests that CARB consider for all methods setting a date certain in the future, or provide for sufficient time following OAL approval (i.e., 2 months), after which only the updated test method can be used. This will provide certainty, or sufficient notice, about the timing compared to an effective date immediately upon OAL approval which is a moving target.

Lastly, in conjunction with a future effective date as discussed above, CARB should allow for use of the new method early to enable sufficient transition time. In other words, there would be a period of time, perhaps starting with OAL approval and leading up to the effective date discussed above, where both the old and new test methods could be utilized. This way, there is not a requirement for abrupt change from one method to another literally between two different batches of fuel. However, after the effective date discussed above, only that new method could be utilized.

bp



We appreciate the opportunity to submit these comments and am available to answer any questions staff has on these suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Miles Heller", is positioned below the word "Sincerely,".

Miles Heller
Senior Advisor, Regulatory Fuels Issues

Cc: Dickman Lum