



04/09/2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comment from Mr. Randall Meador

We thank Mr. Meador for his comment. The comment states "I am opposed to transporting diesel and naphtha by ocean tanker. I support America and California being totally oil self sufficient."

For background, the REG Geismar facility generates renewable fuel products including renewable diesel, renewable propane, and renewable naphtha. These fuels can be used in place of petroleum fuels to displace fossil based fuels and have a lower carbon intensity than fossil fuels.

REG Geismar has worked closely with CARB staff and verifiers to ensure that the information submitted for the LCFS pathway application met all requirements for the LCFS program. The requirements for pathway applications include the transportation of the finished products to California for renewable diesel, renewable naphtha, and renewable propane. The transportation methods which are allowed in the CA-GREET 3.0 calculator include transportation by truck, barge, rail, and by ocean tanker.

REG Geismar's pathway application included transportation by rail or by ocean tanker as discussed in the redacted LCA report posted with the Tier 2 pathway public posting. Both of these transportation methods are well established means to provide renewable transportation fuel to California from the REG Geismar production facility. Ultimately the carbon intensity was found to be higher for the ocean tanker transportation method relative to the rail method. The ocean tanker method is therefore more conservative and was selected for the pathway description.

REG Geismar is proud to be based in America and support the transition to a low carbon intensity, fuel diverse future for California, the United States, and the world.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Sens", is written over a light blue horizontal line.

John Sens

Sustainability Manager