

CVR Renewables WYN, LLC

June 19, 2024

California Air Resources Board (CARB)
Low Carbon Fuel Standard (LCFS)
1001 I Street
Sacramento, California

RE: CVR Renewables WYN, LLC; LCFS Tier 2 Pathway Application B0530 Response to Comments submitted by Dave Rhody

CVR Renewables WYN, LLC (CVR Renewables) provides this response to the comments submitted by Dave Rhody. Mr. Rhody's concerns are related to the use of crop-based feedstocks and whether distilled corn oil (DCO) is miscategorized as a waste oil. Mr. Rhody has also commented that biofuels are not a clean energy solution.

Under CARB's LCFS program, crop-based and waste-based feedstocks can be used in the production of renewable fuel. Because of the use of crop-based feedstocks, the probability of land conversion was taken into consideration during the required Life Cycle Assessment (LCA) process and use of the CARB CA-GREET 3.0 LCA model. The Indirect Land Use Change (ILUC) GHG emissions factor is required for both soybean oil and canola oil. The Indirect Land Use Change emissions factor is an incentive for fuel producers to process more waste-based feedstocks. Distillers Corn Oil is a co-product generated during ethanol production.

In response to the comment that biofuels are not a clean energy solution: Biofuels can be used in place of petroleum fuels to displace fossil-based fuels and generate a lower carbon intensity than fossil fuels. The Low Carbon Fuel Standard (LCFS) is designed to decrease the carbon intensity and provide an increasing range of low-carbon and renewable alternatives, which reduce petroleum dependency with a goal to achieve air quality benefits resulting in lower GHG emissions.

With regards to the comment related to UCO; the CVR Renewables application B0530 does not include used cooking oil (UCO) as a feedstock. Therefore, the comment does not apply to the CVR Renewable's application.

Regards,



Brian K. Joseph
Fuels Compliance Manager