



December 27, 2023

Anil Prabhu, Ph.D.
Manager, Fuels Evaluation Section
Transportation Fuels Branch
California Air Resources Board
1001 I street
Sacramento, CA 95814

Re: Diamond Green Diesel LCFS Tier 2 Pathway Application No. B0540 Response to Comment

Dear Mr. Prabhu:

Diamond Green Diesel (DGD) provides this response to the comment letter submitted by Mr. Joshua Kehoe. This comment raises questions about whether used cooking oil (UCO) sourced from Asia meets the same feedstock accounting and auditing requirements as domestically sourced UCO.

§95488.8(g)(1)(B) of the Low Carbon Fuel Standard (LCFS) provides chain-of-custody requirements for all specified source feedstocks, including used cooking oil, regardless of whether the feedstock originates domestically or internationally. This provision requires fuel pathway applicants to maintain records supporting feedstock type and quantity for each feedstock transaction as well as ensure verifier access to audit feedstock suppliers. Chain-of-custody evidence must also demonstrate the relationship between inputs and outputs at all relevant points along the feedstock supply chain.

DGD satisfied all of these requirements during the third-party validation of this application. During the validation, DGD provided supporting documentation for each of the feedstocks in the application, including Asian UCO, in accordance with selections made by the verifier. The provided documentation included information from DGD's suppliers which established chain-of-custody back to the point of origin. The third-party verifier also interviewed selected suppliers to review their records and data management systems.

DGD's third-party verifier issued a positive verification statement upon completion of their review. CARB subsequently reviewed the application and the results of the validation and recommended the application for certification.

DGD appreciates the opportunity to respond to this comment. We respectfully request that CARB certify the fuel pathways listed in application No. B0540.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Fox". The signature is fluid and cursive, with a distinct "X" at the end.

Neil Fox
Executive Director, Commercial
Diamond Green Diesel