



June 28, 2024:

Attn: Anil Prabhu  
Manager, Fuel Evaluation Section  
Transportation Fuels Branch, Industrial Strategies Division  
California Air Resources Board  
P.O. Box 2815 Sacramento, CA 95812

**Re: Response to Comments on LCFS Fuel Pathway Application B0599**

Vertex Renewables Alabama LLC (Vertex) appreciates the opportunity to provide a response to public comments on LCFS fuel pathway B0599 for renewable diesel produced from waste oils.

Vertex is fully committed to and has followed all regulatory requirements set forth by the Low Carbon Fuel Standard regulation in procuring feed stocks, processing them into renewable fuels and the distribution of renewable fuels.

Vertex appreciates the complexities of calculating emissions factors related to all feed stock sources. To adequately address this, Vertex used the CA-GREET 3.0 model, a widely accepted industry standard tool, to conduct the life cycle assessment (LCA). The LCA factors in the emissions due to transportation of the feed stocks, processing operations and fuel distribution. The resulting carbon intensity scores account for these emissions related to transportation from the country where the waste oils were produced.

Furthermore, the fuel pathway application has been validated by an independent verification body who rendered a positive validation statement. The validation included a thorough audit of feed stock sourcing and documentation such as invoices, certificates of origin and bills of lading.

For these reasons, CARB should certify fuel pathway B0599 as it has been proposed.

*Doug Haugh*

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