

**From:** [jan leeman](#)  
**To:** [ARB LCFS Workshop](#)  
**Subject:** Response to staff request for feedback from May 15 biodiesel workshop  
**Date:** Wednesday, May 17, 2017 11:57:52 AM

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Hello,

I would like to submit the comments below to the ARB.

Best regards,

Jan Leeman

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Dear Sir/Madam:

Bioenergy Development Group LLC, dba Agrileum, a producer of biodiesel for the California market, would like to contribute the following responses to the ARB's May 15 "Biomass-based Diesel in the LCFS" workshop requests for feedback:

Q: Would stakeholders provide specifics on chemical inputs for consideration of site-specific values? [Slide 13, bullet 1]

A: Yes, Agrileum would do so.

Q: Is it reasonable to require information on point of origin for UCO and tallow? [Slide 13, bullet 4]

A: Yes, Agrileum believes that this requirement is reasonable if point of origin is defined as city or county of origin.

Q: For facilities which receive a reviewed CI, changing sources of feedstock could potentially lead to higher pathway CIs leading to non-compliance for reporting. Would stakeholders suggest options to ensure the CI of fuel supplied conforms to the originally certified value? [Slide 14, bullet 1]

A: Agrileum would take advantage of a system that allows for disaggregation of feedstock based on upstream processing and transportation distance. We work very hard to find the most carbon-efficient feedstock sources, and a CI calculation methodology that uses conservative energy mixes and transport distances for a particular feedstock regardless of the source and processing of that feedstock would negate those efforts.

Sincerely,

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