

**From:** Smading, Dan <Dan.Smading@fhr.com>  
**Sent:** Friday, October 06, 2017 2:48 PM  
**To:** ARB LCFS Workshop  
**Subject:** Request for Feedback: 2018 LCFS Preliminary Draft Regulatory Amendment Text

To the Industrial Strategies Division, Transportation Fuels Branch:

Flint Hills Resources (FHR) is pleased to provide feedback on the pre-rulemaking public meeting held to discuss the 2018 LCFS Preliminary Draft Regulatory Amendment Text on September 22, 2017.

During the public meeting, ARB staff requested feedback on the preliminary draft definitions and acronyms in §95481. FHR is providing this feedback on the following preliminary draft definitions of yellow grease, used cooking oil and animal fat:

“Yellow Grease” means a commodity produced from a mixture of: (1) used cooking oil, and (2) rendered animal fats that were not used for cooking. This mixture often is combined from multiple points of origin. Yellow grease must be characterized as “animal fat” if evidence is not provided to the verifier or ARB to confirm that it is solely UCO.

“Used Cooking Oil” means fats and oils originating from commercial or industrial food processing operations, including restaurants, that have been used for cooking or frying. UCO does not contain any other fats, oils, or greases that were not previously used for cooking or frying operations.

“Animal Fat” means the inedible fat that originates from a rendering facility as a product of rendering the by-products from meat processing facilities including animal parts, fat and bone. The primary animal fats used in the biofuel industry include inedible tallow from processing cattle, inedible choice white grease from swine processing, and inedible poultry fat. “Yellow grease” must be characterized as animal fat if evidence is not provided to the verifier or ARB to confirm that it is solely UCO.

FHR believes that the preliminary draft definition of yellow grease is too restrictive and should be modified. If a biodiesel producer can provide evidence to a verifier or ARB to confirm the UCO content of the yellow grease, then the producer should be able to characterize that portion of the yellow grease as UCO and characterize the remainder as animal fat. The FHR proposed modification of the definition of yellow grease will necessitate minor changes to the definitions of used cooking oil and animal fat. Accordingly, FHR suggests the following modifications for the three preliminary draft definitions:

“Yellow Grease” means a commodity produced from a mixture of: ~~(1) used cooking oil (UCO), and (2) rendered animal fats that were not used for cooking~~ ~~oil~~ ~~other fats, oils or greases that do not fit the definition of UCO.~~ This mixture is often combined from multiple points of origin. If evidence is available to confirm the UCO content of yellow grease, then that portion may be characterized as UCO and the remainder of the yellow grease must be characterized as “animal fat” if evidence is not provided to the verifier or ARB to confirm that it is solely UCO.

“Used Cooking Oil (UCO)” means fats and oils originating from commercial or industrial food processing operations, including restaurants, that have been used for cooking or frying. ~~UCO does not contain any other fats, oils, or greases that were not previously used for cooking or frying operations.~~

“Animal Fat” means the inedible fat that originates from a rendering facility as a product of rendering the by-products from meat processing facilities including animal parts, fat and bone. The primary animal fats used in the biofuel industry include inedible tallow from processing cattle, inedible choice white grease from swine processing, and inedible poultry fat. “Yellow grease” must be characterized as animal fat ~~if evidence is not provided to the verifier or ARB to confirm that it is solely UCO~~ except for any portion of yellow grease for which evidence is available to characterize it as UCO.

Thank you for this opportunity to provide feedback.

Please feel free to contact me should you have any questions.

Best Regards,  
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