



ASPHALT PRODUCTS

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September 24, 2012

*Via Electronic Submittal*

Hon. Mary D. Nichols  
Chairman  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95817

**Subject: Comments for the Carbon Dioxide Weighted Tonne Refinery Benchmark**

Dear Madame Chairman:

Lunday-Thagard Company ("LTR") appreciates the opportunity to provide these comments on the California Air Resources Board's ("CARB") approach of the Carbon Weighted Tonne ("CWT") refinery benchmark.

LTR is a small privately-owned petroleum refinery whose principal products include a variety of paving and roofing asphalts. After a preliminary review of the Ecofys work product and the European Union-Emissions Trading System's ("EU-ETS") sector-specific guidance, we are keenly aware that the CWT is not suited for "atypical" refineries, for which LTR can be classified. To that end, we urge the CARB to consider a bifurcated approach to refinery allocations which is sensitive to the fact that the CWT benchmark is ill suited to atypical refineries.

We look forward to working with the CARB towards a mutually beneficial resolution to the refinery allocations in the second and third compliance periods of the program. Please feel free to contact me with any questions.

Thank you for the opportunity to submit these comments.

Sincerely,  
LUNDAY-THAGARD COMPANY

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