

## Documentation of Tier 1 Application Input Data: Transportation Distances and Mode

### Feedstock

Regarding transportation of corn to the ethanol plant, the Midwest ethanol producer receives corn from a storage facility on the farm where the corn is produced or from an elevator. In neither case is the truck delivering the corn going to have included on its bill of lading the distance from the field to the collection center (storage facility or elevator). Developing this information from each ethanol producer is likely to be time-consuming and the amount of documentation is going to be voluminous for a two year period.

Regarding transportation of corn from the collection center to the ethanol plant, there are an extraordinary number of truckloads of corn, and so the documentation will be voluminous.

For both of these, how will the ethanol plant get this data going back two years if it does not yet have a system in place to document?

**As an alternative to documentation of the actual distances, it is suggested that the Midwest ethanol producers (and others in similar situation) have an option of using the 1.8b default values for transportation distances, and attesting that the default values are reasonable estimates of actual distances.**

Otherwise an extraordinary amount of work would be needed to prepare the documentation, as well as to audit the documentation, whether it is the third-party auditor or the CARB compliance auditor.

For other facility locations outside the Midwest, the plants ship feedstock and products by rail, so that is somewhat easier to document, but again the documentation is voluminous, and using the current method of having the producer attest to the accuracy would be a more practical.

### Ethanol Product

Midwest plants typically load the ethanol onto railcars at the production facility. There is normally no trucking of ethanol from the ethanol facility to the rail loading location. **What documentation will be needed to demonstrate to CARB that it is zero?**

Midwest plants typically ship to multiple locations in California. Each will have a different distance. The physical pathway demonstration requires only one supply route. **Can the ethanol producer use the same distance as in the physical pathway demonstration, and can that documentation be sufficient for documenting this distance?**

Midwest plants typically do not know details of transport of their ethanol once it reaches the first terminal in California. **How then are they to document the distance by truck to the blending terminal? For the transport of EtOH from the blending terminal to the retail outlet, the CA-GREET 2.0 uses a default value. How about allowing a default value for this too?**