

From: Logan Caldwell, Houston BioFuels Consultants, LLC

June 19, 2015

#### Documentation of Tier 1 Application Input Data: Chemical, Enzyme and Yeast Use

While purchase invoices show the amount of chemicals, enzymes and yeast purchased or sold by the ethanol producer during a given period, they do not indicate how much was used. To get an accurate estimate of the amount used, the starting and ending inventory of these items would be needed such that the amount used could be calculated. **What documentation would be acceptable for the starting and ending inventory?**

Also, some of these are purchased frequently, as frequently as daily in some cases from what I understand, but others are purchased infrequently. Those with frequent purchases will have voluminous documentation.

**The regulations do not provide for the independent, third-party auditor to attest in lieu of documentation. It is proposed that attestation from the producer or attestation by an independent, third party auditor be considered as an alternative to detailed documentation?**