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Sent: Thursday, June 11, 2015 4:21 PM
To: Chowdhury, Hafizur@ARB
Subject: Documenting transportation distances and mode for Tier 1 applications

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.

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?

I would suggest that the Midwest ethanol producers 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.

Regards,
Logan

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