

From: Logan Caldwell [mailto:lc@hbioc.net]
Sent: Friday, June 26, 2015 10:31 AM
To: Chowdhury, Hafizur@ARB
Subject: Which "CI" is the reference for the 20% reduction Tier 2 requirement?

Hafizur:

In section 95488(b) (2)(F)(4) it is written:
"Production process innovations that improve production efficiency such that resulting CI is at least 20 percent lower due to the process innovation."

I have looked at the definition of "carbon intensity", and the acronym "CI" and it is not clear whether this section is referring to the total indirect and direct CI, the direct CI or the CI of the energy consumption in the process facility.

In the definitions section of the proposed regulations, "day" is defined as meaning a calendar day unless specified otherwise. Perhaps "carbon intensity" should also be further specified in the definition to mean the total direct and indirect CI over the full lifecycle unless specified otherwise, or whatever specific definition want to have for the term "carbon intensity". The definition mentions lifecycle, but does not state full lifecycle.

Regards,
Logan

Logan Caldwell, President
Houston BioFuels Consultants LLC
Tel: 281-360-8515
Mobile: 281-250-0396
lc@hbioc.net
www.houstonbiofuelsconsultants.com
Yahoo IM: loganethanol

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