



UNITED ASSOCIATION

of Journeymen and Apprentices of the
Plumbing and Pipe Fitting Industry of
the United States and Canada

Founded 1889

Letters should
be confined to
one subject

UA Local Union:

Subject:

Plumbers, Pipe and Refrigeration Fitter Local Union 460

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June 18, 2015

Clerk of the Board
California Air Resources Board
1001 I Street
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Subject: Comments on the 15 Day Regulatory package for the LCFS Regulation

The UA Plumbers, Pipefitters & Steamfitters Local Union 460 strongly supports the Low Carbon Fuel Standard's (LCFS or regulation) provisions for Low Complexity – Low Energy Use Refiners (LCLE Refiners). These provisions recognize that not all refineries are the same. We believe that there are solid policy and technical justifications for this distinction to be codified in the LCFS. The Air Resources board (CARB or Board), as well as, the U.S. Environmental Protection Agency have traditionally recognized in their regulatory programs the unique value small refiners (LCLE) occupy in both the oil and finished fuel markets, as well as, their unique configurations and operating constraints. Recognizing that difference is a very positive step.

However, we are disappointed that the proposed final regulatory provisions for the re-adoption of California's Low Carbon Fuel Standard (15-day changes) fails to recognize Alon's Bakersfield Refinery as a low carbon fuel producer (LCLE). The facility is configured and engineered to produce low CI base fuels. It is for this reason that we are saddened that staff was unable to agree on a solution that would include all of California's truly LCLE refineries. The staff had an opportunity to make the LCFS'S LCLE provisions work for all low carbon intensity refineries in California, but decided against various compromise proposals presented, including proposals to limit the benefit any single LCLE refiner could receive in an attempt to deal with staff's concerns for "regulatory creep" and "breaking the Bank".

UA Plumbers, Pipefitters & Steamfitters Local Union 460 strongly urges the Board to direct staff to revisit this issue at the earliest opportunity.

Respectfully submitted,

Steven Gomez
Local Union 460
Business Manager