U.S. Canola Association
600 Pennsylvania Ave., SE, Suite 320
Washington, DC 20003
Phone (202) 969-8113
Fax (202) 969-7036

May 27, 2020

Via Electronic Mail

Anne Idsal
Principal Deputy Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Idsal.anne@epa.gov

Re: Renewable Diesel from Canola Oil as "Advanced Biofuel" Under the Renewable Fuel Standard Program

Dear Ms. Idsal:

On March 12, 2020, the U.S. Canola Association (USCA) submitted a petition requesting EPA establish pathways for renewable diesel derived from canola oil to generate Renewable Identification Numbers (RINs) as "advanced biofuel" (D4 and D5 RINs) under the Renewable Fuel Standard program. We appreciate your office meeting with us with respect to this issue on March 9. As you are aware, the petition supplements an original request from the canola industry in 2010 when EPA approved a D4 pathway for canola oil biodiesel, providing updated data and technical support for such pathways. USCA appreciates EPA's consideration of this petition and the efforts of EPA's staff, particularly during these unique times.

Under the Renewable Fuel Standard program, renewable diesel production continues to grow. With expansions and new facilities under construction or in development, it is anticipated that, by 2022, there will be approximately 2 billion gallons of renewable diesel production capacity from dedicated facilities in the United States. Even in these troubling times, investment and interest in renewable diesel remains strong, calling for a diversification of feedstocks to provide renewable diesel producers with flexibility to promote market efficiencies and reduce costs. Along those lines, canola oil provides a viable alternative feedstock for renewable diesel production to help meet demand and reduce price volatility. Importantly, canola is produced

through sustainable farming practices and production is growing through increased intensification and higher crop yields, not by clearing new lands.

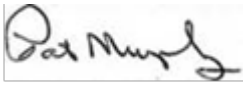
USCA believes EPA has sufficient information to add pathways for renewable diesel from canola oil as "advanced biofuel" in Table 1, 40 C.F.R. §80.1426(f). To do so, EPA need only "make a determination" whether the lifecycle greenhouse gas emissions would be at least 50 percent less than the baseline lifecycle greenhouse gas emissions. A review of the assumptions used and findings for the biodiesel pathway in 2010 and recent data show EPA's emissions modeling results for canola oil production were significantly over-estimated. A few adjustments to those findings demonstrate additional emissions reductions associated with canola production and processing that show lifecycle emissions reductions well above 50 percent and provide more than adequate support for such a determination.

The undersigned include or represent feedstock producers, processors, renewable diesel producers and obligated parties and support USCA's request that EPA approve canola oil renewable diesel pathways as advanced biofuel under the Renewable Fuel Standard program. Establishing these pathways would help sustain the investments being made in renewable diesel, while also providing alternative markets for farmers and canola oil processors. The current public health and economic crisis provides a stark example of how diversification of markets can help companies and workers throughout the feedstock production and fuel supply chain withstand regional or national emergencies.

EPA previously has included proposals to add new pathways as part of its annual standard-setting process, such as in the 2020 Renewable Fuel Standards finalized in February of this year. Given the time EPA has had to undertake this review and EPA's own criteria to prioritize pathway petitions for drop-in fuels commercially available today, we urge EPA to include a proposal to add pathways for canola oil renewable diesel as advanced biofuel in the upcoming rulemaking process for the 2021 renewable fuel standards or as soon as may be practicable.

We thank you in advance for your consideration.

Best Regards,



Pat Murphy
President
U.S. Canola Association

Anne Idsal
Principal Deputy Assistant Administrator
U.S. Environmental Protection Agency
May 27, 2020

Supporting Companies and Organizations

cc: Alex Dominguez, EPA
Karl Simon, EPA
Sharyn Lie, EPA
Aaron Levy, EPA
J.W. Hackett, EPA
Aaron Sobel, EPA