

Certification Evaluation Report

Roundtable on Sustainable Biomaterials

AltAir Fuels LLC

SCS Certificate Code-SCS-RSB/PC-0029

14700 Downey Avenue, Paramount, CA 90723 USA

Gary Grimes

www.altairfuels.com

CERTIFIED	EXPIRATION
December 14, 2017	December 13, 2022

DATE OF FIELD AUDIT
August 22-24, 2017
DATE OF LAST UPDATE
December 14, 2017

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FOREWORD

SCS Global Services (SCS) is a certification body accredited by the Roundtable on Sustainable Biomaterials (RSB) to conduct evaluations of biofuel operators. Under the RSB/SCS certification system, participating operators meeting international standards of biofuel production can be certified as “sustainable,” thereby permitting the Operator’s use of the RSB endorsement and logo in the marketplace subject to regular RSB/SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts all over the world to conduct evaluations of biofuel operations. SCS evaluation teams collect and analyze written materials, conduct interviews with Participating Operator’s staff and key stakeholders, and complete field and office audits of the operation(s) identified in the certification scope. Upon completion of the fact-finding phase of all evaluations, SCS teams determine compliance to the RSB Principles and Criteria.

Please Note: An RSB certificate itself does not constitute evidence that a particular product supplied by the certificate holder is certified to RSB standards. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required RSB claim is clearly stated on-product. For more information about the RSB, visit their website at www.rsb.org.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Roundtable on Sustainable Biomaterials. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs, and policies applied to the Participating Operator, and the results of the evaluation. Section A will be posted on the RSB Participating Operators Database (<http://rsb.org/certification/participating-operators/>). Section B contains more detailed results and information for use by the Participating Operator.

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SECTION A – PUBLIC SUMMARY

1.0 GENERAL INFORMATION

1.1 Operator Information

1.1.1 Name and Contact Information

Organization name	AltAir Fuels LLC		
Operator Number	1495		
Contact person	Gary Grimes		
Address	14700 Downey Avenue Paramount, CA 90723 USA	Telephone	(562) 531-2060
		Fax	(562) 633-8211
		e-mail	ggrimes@ppcla.com
		Website	www.altairfuels.com

1.1.2 Additional Parties Involved (Moved to appendix for confidentiality)

1.2 Scope of Certificate

Please choose one:	<input type="checkbox"/> RSB EU RED	<input checked="" type="checkbox"/> RSB Global
Please select boxes that apply:	<input type="checkbox"/> Pre-assessment <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Re-certification <input type="checkbox"/> Follow-Up to NCs	<input type="checkbox"/> 1st Annual Surveillance <input type="checkbox"/> 2nd Annual Surveillance <input type="checkbox"/> 3rd Annual Surveillance <input type="checkbox"/> 4th Annual Surveillance
The scope assessment agrees with the scope under which the operator applied	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If no, please explain:		
<i>Note: If the scope is different, please contact SCS.</i>		

INDUSTRIAL FACILITIES	
Name	AltAir Fuels LLC
Type	<input type="checkbox"/> Agriculture Milling and/or Fermentation <input checked="" type="checkbox"/> Biofuel Production and/or Distribution <input type="checkbox"/> Other, please explain here: <input type="checkbox"/> Vegetable oil Extraction <input type="checkbox"/> Storage or Distribution

Location/City	Paramount, CA		
Geographic location (<i>Latitude & Longitude</i>)	33.899844 North 118.150185 West		
Start date of operations (initial start date)	January 2016		
Number of processing steps	6		
Annual throughput of previous 12 months			
Feedstock Input (Metric Ton)	Information is confidential, see Appendix 2		
Final/Primary Product Output (Metric Ton)	Information is confidential, see Appendix 2		
Intermediate/by-product Output (Metric Ton)	Information is confidential, see Appendix 2		
% output yield compared to input material (total output/total input)	Information is confidential, see Appendix 2		
Amount sold as RSB certified (tons)	Information is confidential, see Appendix 2		
Description of Production/Processing Activities: Hydro-Pretreating, Hydrotreating, Isomerization, Hydrocracking, Fractionation, Product Blending			
For Biofuels Producers: Please state the GHG emissions occurring at the operator's sites in g CO2eq/dry-ton for raw materials and intermediary products and g CO2eq/MJ for final biofuels (annualized, after allocation) and if applicable, achieved emission savings, and if applicable, explanation for deviation from typical GHG values			
Raw Material:	Tallow	GHG	16.5 g CO2e/MJ
Final Biofuel:	Renewable Jet Fuel	GHG	32.8 g CO2e/MJ
<i>Add more lines as you see fit</i>			

1.3 Standards Used

1.3.1 Applicable RSB-Accredited Standards

Title	Version	Date of Finalization
RSB Principles & Criteria (RSB-STD-01-001)	3.0	2016-10-01
RSB Chain of Custody (RSB-STD-20-001)	3.1	2014-09-23
RSB Standard for Participating Operators (RSB-STD-30-001)	3.1	2016-05-01
RSB Risk Management (RSB-STD-60-001)	3.1	2016-09-01
RSB Procedure on Communication and Claims (RSB-PRO-50-001)	3.2	2016-01-29
RSB Waste and Residues (RSB-STD-01-010)	1.7	2017-03-31
RSB Procedures for Certification Bodies and Auditors (RSB-PRO-70-001)	3.1	2016-08-09

All standards employed are available on the websites of the Roundtable on Sustainable Biomaterials (<http://rsb.org/sustainability/rsb-sustainability-standards/>). Standards are also available, upon request, from SCS Global Services (<http://www.scsglobalservices.com/>).

2.0 EVALUATION PLANNING & PROCESS

2.1 Documentation Submitted by Operator

ESMP (draft 2017-08-09)	PSM Contractor Safety Manual (2016-06)
RINS Process Workflow (2017-08)	Chain of Custody Process (2017-08-09)
Product Transfer Documentation Workflow (2017-08)	

2.2 Audit Type and Determination

The following table summarizes the audit types for RSB Audits:

	Low risk class	Medium risk class	High risk class
Certificate validity	5 years	3 years	2 year
Main audit	Every 5 years	Every 3 years	Every 2 year
Surveillance audit	Annual	Annual	Annual

2.3 Determination of Audit Team

- Desk audits shall always be conducted by at minimum one (1) international lead auditor. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- Field audits shall always be led by one (1) international lead auditor.
- The lead auditor appointed shall include at minimum one (1) local auditor in the audit team. The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.
- For field audits of participating operators in High Risk class shall always the lead auditor appointed shall appoint at minimum
 - one (1) local auditor and
 - one (1) technical expert on social issues to evaluate compliance with social requirements and the risk of non-compliance due to social issues and
 - one (1) technical expert on environmental issues to evaluate compliance with environmental requirements and the risk of non-compliance due to environmental issues.
 - The lead auditor appointed may include additional auditors and/or technical experts in the audit team if this is required by the extent of the audit.

2.3.1 Audit Team

Auditor Name:	John Shideler	Auditor role:	Lead Auditor
<p>Qualifications: Mr. John Shideler is an environmental professional with 19 years’ experience auditing management systems and greenhouse gas statements for a number of accredited certification bodies. He is currently certified as a greenhouse gas lead verifier by the California Air Resources Board. He is an experienced ISO 14001/OHSAS 18001 lead auditor and previously held lead auditor certification for auditing Responsible Care management systems for members and partners in the chemical manufacturing industry. He represents his company, Futurepast: Inc., in CAAFI, the Commercial Aviation Alternative Fuel Initiative. He has provided consulting services on the topic of sustainability of aviation biofuels to the Alternative Fuels Project Manager in the Federal Aviation Administration’s Office of Environment and Energy. He led Futurepast’s contribution to a report published by the National Academy of Sciences Transportation Research Board on “Tracking Alternative Jet Fuel” (ACRP 02-65, 2016).</p> <p>As a US expert, he has contributed to the writing of several greenhouse gas standards (ISO 14064-3, ISO 14065, ISO 14066, ISO 14067, and ISO 14069). He is the current chair of ISO Technical Committee 207 Subcommittee 4 on Environmental Performance Evaluation, and he served as ISO TC207 liaison to ISO Project Committee 248 which published ISO 13065, Sustainability criteria for bioenergy. He earned a PhD degree in history at the University of California, Berkeley.</p>			

2.4 Evaluation Schedule and Extent of Audit

2.4.1 Determination of Extent of Audit

Total number of subsidiaries, branch offices, affiliated entities, external third parties contracted or otherwise engaged, operational structures, sites, facilities, processing and production units, and supply chain structures	AltAir Fuels’ production facilities are located at the Paramount Petroleum site in Paramount, CA. A laboratory that provides fuel certificates of analysis for AltAir Fuels is located at a separate facility at 2400 E. Artesia Blvd, Long Beach, CA 90805. AltAir Fuels leases a storage tank from the Kinder Morgan Carson Terminal located at 2000 East Sepulveda Blvd., Carson, CA 90810.
Participating Operator Risk Class	Low
Disputes or prior Non-compliances	None
Changes in scope since last evaluation	N/A (this is the initial certification)
Total number of compliance claims	0

2.4.2 Evaluation Itinerary and Activities

Date: 2017-08-22	
Operation(s)/ sites visited	Activities/ notes
AltAir Fuels, Paramount, CA	Opening Meeting Review of Participating Operator Requirements Principles and Criteria

	Human Resources Risk Management Site Walk-through Procedure on communication and claims
Date: 2017-08-23	
Operation(s)/ sites visited	Activities/ notes
AltAir Fuels, Paramount, CA	Chain-of-custody system Information on Points of Origin Worker Interviews GHG calculations
Date: 2017-08-24	
Operation(s)/ sites visited	Activities/ notes
AltAir Fuels, Paramount, CA	Interview safety manager and RSB management representative Report Writing Closing meeting

2.5 Evaluation of Management System

2.5.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in agriculture, ecology, forestry, social sciences, natural resource economics, and other relevant fields to assess an Operator’s compliance to RSB standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of site and facility types, observation of implementation of management plans and policies, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise.

The SCS audit team held an opening meeting on August 22, 2017, with eight AltAir Fuels management personnel at the Paramount Petroleum site in Paramount, CA. Seven members of management attended the closing meeting held on August 24, 2017. Following the opening meeting, the audit team reviewed documents, interviewed management and staff, and performed a walk-through of the chemical production and materials handling areas of AltAir Fuels. The audit team interviewed workers and stakeholders, including AltAir Fuels plant operators.

2.5.2 Capacity of the participating operator to implement its management systems

AltAir Fuels operated in a heavily regulated industry and implemented management controls in response to regulatory requirements derived from both U.S. federal and California state legislation. The applicability of process safety management regulations provided an ample framework for AltAir Fuel’s risk management approach. The system relied upon the expertise of subject matter experts in various departments (environmental, safety, operations, finance, human resources, etc.) to identify and manage risks, to identify training needs and qualify personnel, and to maintain required records.

2.5.3 Evaluation of RSB compliance claims and use of RSB trademarks

Type (compliance claim, trademark use)	Description	Findings
Compliance claim	On-product claims	AltAir Fuels did not make on-product claims or use RSB trademarks
Trademarks	Use of RSB logo or name	AltAir Fuels did not make on-product claims or use RSB trademarks

2.6 Stakeholder Consultation Process

In accordance with SCS and RSB protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. The primary purpose of such consultation is to solicit input from affected parties as to the strengths and weaknesses of the Participating Operator’s management system and operations, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Principal stakeholder groups are identified based upon the certification scope of the participating operator.

Stakeholder consultation activities are organized according to the requirements of the RSB. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

2.6.1 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

Stakeholder Comments	SCS Response
Economic Concerns	
Community stakeholders appreciated the employment opportunities that AltAir Fuels provided to local residents.	None required.
Social Concerns	
Community stakeholders appreciated the responsiveness of AltAir Fuels to local residents' inquiries and their support of local neighborhoods and schools.	None required.
Environmental Concerns	
Local air quality regulatory authority representative stated that AltAir Fuels was responsive to air quality regulations and did not operate in a manner inconsistent with their permit.	None required.

3.0 RISK ASSESSMENT RESULTS

Based on the most recent self-risk assessment (no older than 3 months from the audit date) the PO's risk assessment results are:	Corresponding risk class (low, medium, high):
3	Low

Due to the results of the Risk Assessment, the evaluation did not need to be rescheduled.

4.0 RESULTS OF THE EVALUATION

4.1 Process of Determining Compliance

4.1.1 Structure of Standard and Degrees of Non-Compliance

RSB-accredited biofuel standards consist of a three-level hierarchy: the principle, the criteria that correspond to that principle, and then the performance indicators that elaborate upon each criterion. Consistent with SCS Sustainable Biofuels Program evaluation protocols, the team collectively determines whether or not the subject operation is in compliance with every applicable indicator of the relevant sustainable biofuel standard. Each non-compliance must be evaluated to determine whether it constitutes a major or minor non-compliance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-compliance. The team therefore must use their collective judgment to assess each criterion and determine if the Operator is in compliance. If the Operator is determined to be in non-compliance at the criterion level, then at least one of the applicable indicators must be in major non-compliance.

4.1.2 Interpretations of Major and Minor Non-compliances

Major Non-compliances, either alone or in combination with non-compliances of other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant RSB Criterion. These non-compliances must be resolved or closed out before a certificate can be awarded. If Major NCs arise after an operation is certified, the timeframe for correcting these non-compliances is typically no more than three months. Certification is contingent on the certified PO’s response to the NCs within the stipulated time frame.

Minor Non-compliances are typically limited in scale or can be characterized as an unusual lapse in the system. Most minor NCs are the result of a non-conformance at the indicator-level. Non-compliances must be closed out within a specified time period of award of the certificate.

4.1.3 Major Non-compliances

<input type="checkbox"/>	No major NCs were issued to the Operator during the evaluation. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input checked="" type="checkbox"/>	Major NCs were issued to the Operator during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major NCs were issued to the Operator during the evaluation and the Operator has not yet satisfactorily closed all major NCs.

4.1.4 Non-compliances and Current Status

Instructions:

- Initial certification audit: list all Non-conformities and Opportunities for Improvement issued during this audit.
- Surveillance/Recertification: list status of minor NCs that were not closed in previous audit, then list new NCs/OFIs issued during this audit.

Summary of Non-compliances and Current Status				
Non-compliance Number	Type of Non-compliance	Relevant RSB Standard & Indicator No.	Summary of Finding and Evidence Collected	Status of Non-compliance (Open/Closed)
2017-1	Major	STD-01-001, P&Cs: P2, 2.1.6, 9.b.1-9.b.6, 9.c.1, 9.c.2, 10.a.1, 11.e.1	The ESMP did not include or make reference to all the required elements. Evidence: The ESMP did not include a water management plan, an air emissions plan, or a wastes and by-products management plan.	Closed


			<p>Updated ESMP includes an air emissions plan, a water management plan and a waste management plan.</p> <p>Provided 11/15/17</p>	
2017-2	Major	<p>RSB Risk Management (RSB-STD-60-001), F.2.2 PO Checklist 3.1</p>	<p>The risk management plan did not address the risks associated with failure to implement:</p> <ul style="list-style-type: none"> — RSB Principles, Criteria and Requirements — RSB Standard for Participating Operators — RSB Chain of Custody Standard <p>The updated ESMP includes a RSB Specific Risk Management Plan (Annex 7.L)</p> <p>Provided 11/15/17</p>	Closed
2017-3	Major	<p>STD-30-001 PO Checklist 1.1, 1.2, 1.4</p>	<p>Participating operator information did not address the following:</p> <ul style="list-style-type: none"> — Evidence of acceptance of the RSB terms and conditions (F.1.1) — Profile of activities and operations (F.1.2) — Documented scope of certification (F.1.3) <p>Added RSB Participating Operator Agreement to the ESMP (Annex 7.K) to demonstrate evidence of acceptance of the RSB terms and conditions (F.1.1) Added a profile of activities and RSB scope to the RSB (Annex 7.M)</p> <p>Provided 11/15/17</p>	Closed
2017-4	Minor	<p>STD-01-010, H.2.5 PO Checklist 12.4.4</p>	<p>AltAir Fuels had not demonstrated that its technical tallow was produced in slaughterhouses or rendering units in which environmental and animal welfare regulations were locally enforced.</p> <p>Operator submitted document that states that Cargill Fort Morgan plant meets the requirements of AMI; evidence for other tallow providers to be submitted.</p>	Open
2017-5	Major downgraded to Minor	<p>PRO-70-001, H.1.4.1.5b PO Checklist 6.2.3</p>	<p>AltAir Fuels had not obtained or made available information necessary for SCS to audit a representative sample of its tallow suppliers for the following information:</p> <ul style="list-style-type: none"> — Descriptions and operating figures (e.g. throughput, output of main product(s), by- 	Open

			<p>product(s) and waste/residues) of the process/ operation from where the waste or residue is derived</p> <p>— Quarterly balance of incoming and outgoing material including records</p> <p>Altair has provided the necessary information regarding the tallow suppliers providing back to back shipments according to the Reactive Guidance on Traceability for end-of-life products, by-products and residues in the case of back-to-back shipments, 20 October 2017. Altair provided information for Cargill, Tyson, JBS, and Progressive Proteins, and National Beef Packaging.</p> <p>However, the following information was missing from documents:</p> <p>a. Contract with Cargill did not include "type of facility" being operated" is not included in the documents.</p> <p>b. BOLS for the POs were missing the following information:</p> <ol style="list-style-type: none"> 1. Tyson address not fully stated on BOL 2. Quantity and Date of Delivery missing from National Beef Packing BOL 3. Date of Delivery missing from Progressive Proteins BOL 	
2017-6	Major	PRO-70-001, H.1.4.1.5a	<p>AltAir Fuels had not obtained or made available information necessary for SCS to audit a representative sample of its aggregator for the following information: — Descriptions and operating figures (e.g. throughput, output of main product(s), by-product(s) and waste/residues) of the process/ operation from where the waste or residue is derived— Quarterly balance of incoming and outgoing material including records</p>	Closed

			This NC is closed given that it is no longer relevant due to "Reactive Guidance on Traceability for end-of-life products, by-products and residues in the case of back-to-back shipments, 20 October 2017" provided by RSB.	
2017-7	Major	PRO-70-001, H.1.2.5 and H.1.2.6 PO Checklist 1.8	<p>The self-evaluation and self-risk assessment of AltAir Fuels were not up-to-date. Evidence: The documents were more than 3 months old.</p> <p>The updated ESMP includes a recent self-evaluation (RSB Screening Tool - Annex 7.J) and self-risk assessment (Annex 7.B).</p> <p>Provided 11/15/17</p>	Closed
2017-8	Minor	STD-01-010, H.2.5	<p>The GHG emissions calculations did not take into account upstream emissions from animal production. Evidence: The Biograce model version 4d did not take account of upstream emissions as required by RSB.</p> <p>Upstream emissions not required as per "Reactive Guidance on Upstream GHG emissions for waste animal fat 13 September 2017"</p>	Closed
2017-9	OFI	STD-01-001, P&Cs:P3, 3.a.1	<p>The BioGrace model included as a default transportation emissions from Paramount to Los Angeles International Airport. An opportunity for improvement is to make available to downstream purchasers information about how they can access transportation emissions information for destinations other than LAX.</p> <p>Company response: AltAir will have Life Cycle Associates construct a table with added truck or rail transportation emissions for potential market areas using BioGrace or GREET and provide it to interested customers.</p>	Open
2017-10	Major	STD-01-001, P&CS: P2, 2.b.8	<p>Evidence of management documents being made publicly not provided during the audit.</p> <p>The statement: ""The AltAir Fuels Environmental and Social Management Plan and Air, Water, and Waste management plans are available on request to info@altairfuels.com" can be viewed on the Altair website: http://altairfuels.com/</p>	Closed

2017-11	Major	RSB-STD-01-001, See PO Checklist 9.2.2, 9.2.4	<p>Sufficient documentation has not been submitted to show that operator records details of actual GHG value. Additionally, the following information is missing/ unconfirmed: 1. That the two line items in the BioGrace spreadsheet, tabs "H-WO" and "H-WO MethA1", on lines 54 and 55 (NG boiler and HFO boiler) account for all the gaseous fuel used in the refinery operation, 2. How in Tab "H-WO" the values entered in cells C53 and C54, and the values entered in C85 derive from measured consumption values 3. How in Tab "H-WO MethA1" the values entered in cells C52 and C54, and the values entered in C84 derive from measured consumption values 4. How the emissions factors for hydrogen were derived in tab "H-WO" cell C84 and in tab "H-WO MethA1" cell C83.</p> <p>Jet.xlsx" summarizing the source data for Table 4 (Tab RD Energy, cells I35:L45), of the Life Cycle Associates Report dated July, 2017 in Annex 7.A of the ESMP was provided via email. This source data is collected from numerous internal data sources, including monthly energy invoices, monthly feedstock consumption and production, and chemical purchases.</p> <p>Provided 11/15/17</p> <p>Re: Points 1-4: SCS reviewed inputs (H2, tallow), outputs (RD), and energy usage (electricity and natural gas) for Q4 2016. Everything corresponds with the values used in the GREET model.</p>	Closed
2017-12	Minor	RSB-STD-01-001, See PO Checklist 1.7, 5.4	Contract with Noble Americas not provided	Open

6.0 CERTIFICATION DECISION

Certification Recommendation		
Operator to be awarded RSB certification subject to the minor non-compliances stated in Section 4.2.5.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Responsible Biofuels Program evaluation protocols. If certification is recommended, the Operator has satisfactorily demonstrated the following without exception:		
Operator has addressed any Major NC(s) assigned during the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards are met over the sites and facilities covered by the scope of the evaluation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Operator has demonstrated that the described system of management is being implemented consistently over the sites and facilities covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments and/or details of any issue which was difficult and/or impossible to evaluate:		
To be completed by Certification Decision-Making Entity	Technical Review by: If different to decision-maker	Inna Kitaychik
	Certification decision:	Altair is awarded RSB certification status.
	Certification decision by:	Matthew Rudolf 
	Date of decision: For initial or continued certification	12/14/17
	Surveillance schedule:	1 st surveillance audit to take place by December 14, 2018
	Notes:	

Sub Certificate Codes (if applicable)

Legal Entity/Operational Site	Sub-Certificate Code