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Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

Darling Ingredients Inc. is the largest waste oil supplier in the United States and is also a joint owner of the largest operating renewable diesel facility, Diamond Green Diesel (DGD), in North America. DGD is located in Norco, Louisiana and is a joint venture between our company and Valero. To date, Darling and Valero have invested more than \$2.1 billion dollars into DGD, and we produce over 700 million gallons annually of renewable diesel. The companies have started construction on a second location in Port Arthur, Texas to expand production by an additional 470 million gallons.

DGD utilizes used cooking oils, waste animal fats, distillers corn oil, and industrial grade vegetable oils and converts them to renewable diesel to be used in over-the-road heavy duty trucks, rail and marine engines, and off-road construction and agriculture equipment. Using renewable diesel reduces GHGs by up to 83% compared to traditional petroleum diesel and is a key component to our nation's goal of reducing transportation GHGs. I might add there is another renewable diesel facility in Louisiana operated by REG which produces another 90 million gallons of renewable diesel annually.

Why is rail transportation critical to DGD? Well, the answer is simple. Waste oils and other raw materials are feedstocks necessary to produce renewable diesel at DGD, and the United States' railroad network is integral to transporting the waste fats and oils to Louisiana. Darling Ingredients ships more than 7,000 railcars of feedstock to DGD. Once processed, DGD utilizes the railroad network to deliver renewable diesel products to the marketplace all over the United States.

Our daily use of the rail transportation is mirrored by REG and others in the agriculture sector to bring our products to New Orleans, a major hub for international trade. As our nation's economy has grown over the years, so has the demand for rail transportation to support the movement of goods around the globe via export terminals. Our nation's transportation infrastructure is a key component to our ability to compete on the global stage for exporting agriculture commodities and other goods. While demand for rail transportation to move industrial goods has significantly increased, the ability to expand railroad capacity on the Gulf Coast is limited because of geographical concerns. With the Gulf Coast railroad transportation network operating near capacity, any proposal to increase rail commuter traffic in the region will have a significant adverse impact in Louisiana and throughout the Gulf Coast. Darling has made a huge investment in DGD and our asset could suffer greatly due to less efficient transportation and delays. These delays will result in decreased turn times, blocked crossings, safety of crossings, greater costs to consumers, and greater idle time of running locomotive engines which seems counterproductive to our goal of reducing GHG from the transportation industry.

Darling Ingredients supports greater passenger rail traffic, but any changes should be carefully planned and implemented to ensure that there is minimal delay and impacts for all rail traffic using the tracks and bridges. Furthermore, Darling Ingredients made this tremendous investment based on long-term rail studies. It was a significant factor in the decision to build DGD in Norco, and now the sudden addition of passenger traffic without planned infrastructure investments in advance is ill advised, threatens the viability of the plant, and is not in the best interest of all users of the region's rail system.

Respectfully submitted,

Michael L Rath

Michael Rath
Darling Ingredients

cc: FD 36496 Service List