

Registration, Recordkeeping, and Reporting Requirements

U.S. EPA

Office of Transportation and Air
Quality

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Renewable Fuels Standard (RFS)

National Biodiesel Board Webinar

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Topics

- Background Information
 - Things You Will Hear
 - Registration
 - RIN Life Cycle
- Compliance Period
- Registration Requirements
- Recordkeeping Requirements
- Reporting Requirements
- RFS Report Examples



Things You Will Hear

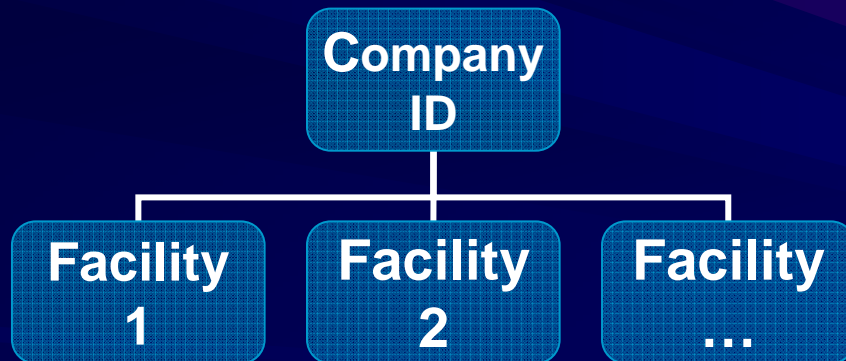
- PTD (Product Transfer Document)
In the Context of RFS, This Means Ownership or Title Transfer Documents; Not Custody
- CDX (Central Data Exchange) – Web Portal –
Electronic Reporting





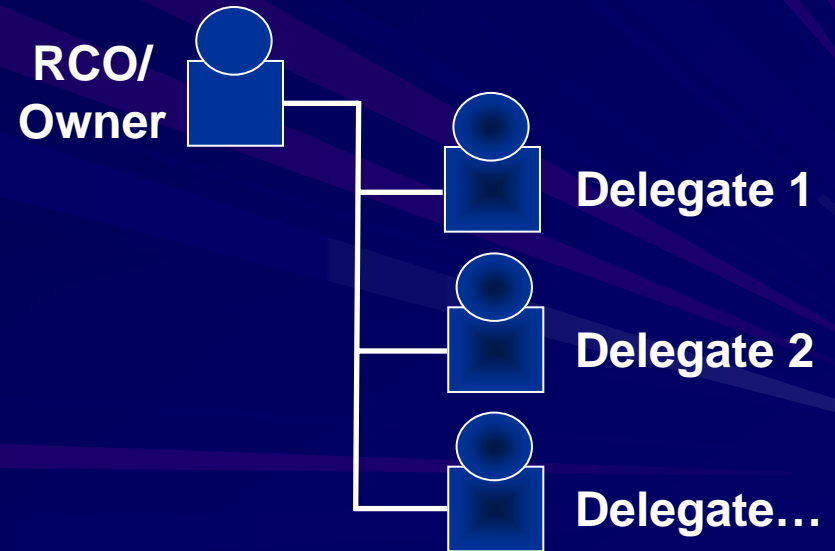
Registration: Company/Facility vs. CDX

- Company & Facility Registration
 - Corporate Entity Id
 - Facility ID
 - Infrastructure
 - Places



- CDX Registration

- Personal Account – Assigned to an Individual
- Owner/RCO
- Delegates (optional)





RIN Lifecycle

RIN Generation

- Biodiesel Producer
- Ethanol Producer
- Other Producers/ Importers



RIN Compliance Use

- Refiners/Importers
- Renewable Exporters



Compliance Period

- RFS Program is Based on a Calendar Year
- Annual Compliance Period; January 1 – December 31.
 - Q1; January 1 – March 31 (Reports Due May 31)
 - Q2; April 1 – June 30 (Reports Due August 31)
 - Q3; July 1 – September 30 (Reports Due November 30)
 - Q4; October 1 – December 31 (Reports Due February 28)
 - Annual Reports Due February 28



Compliance Period

- 2007 Compliance Starts September 1
 - The First Quarter of the Program is Q3, Month of September
 - First Reports Due November 30
 - Q4 Reports, October – December, Due February 28, 2008
 - 2007 Annual Compliance Reports Due February 28, 2008
 - 2007 List of RINs Used to Demonstrate Compliance Due May 31, 2008



Registration: Company & Facility IDs

- Registration is Necessary Prior to Engaging in RIN Generation, Transactions or Owning RINS
- The RFS Starts September 1, 2007
- Registration System Will Piggyback on Existing Gasoline and Diesel Systems
- Facilities are Assigned IDs Based on their Physical Location
- Registration Forms Posted on the OTAQ Website
 - 3520-20A (Company/Entity Registration Form)
 - 3520-20B (Facility Registration Form – gasoline & ethanol)
 - 3520-20B1 (Diesel [& Biodiesel] Facility Registration Form)



Registration: Company & Facility IDs

- RIN Generation

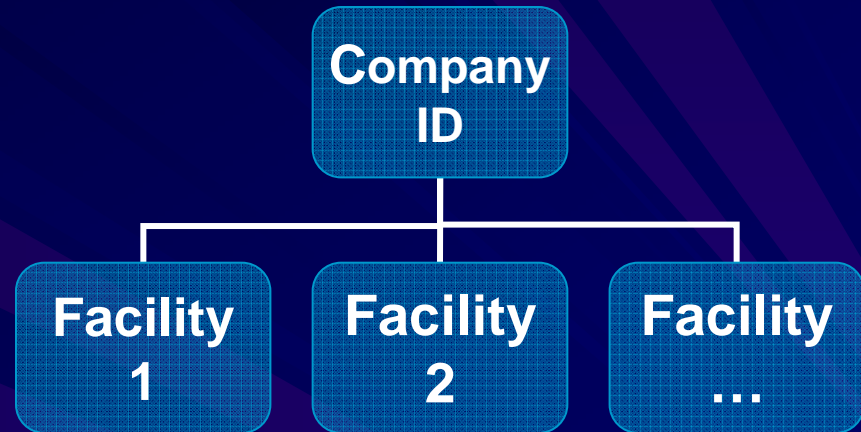
- EPA Assigned Company ID
- EPA Assigned Facility ID(s)

- RIN Transactions

- EPA Assigned Company ID

- RIN Compliance – Obligated Parties, Renewable Exporters

- EPA Assigned Company ID (RFG Program)
- EPA Assigned Facility ID(s) - Optional





Recordkeeping: Basics

- Record Retention – 5 Years From the Date Records were Created; for Records Related to RIN Transactions, 5 Years From the Transaction Date.
- Electronic vs. Paper Records
 - Either is Acceptable
- On request by EPA, Records Must be Made Available.
 - For Electronic Records –
 - Includes Equipment or Software Needed to Read Electronic Records, or
 - If Requested by EPA, Electronic Records Shall be Converted to Paper Documents



Recordkeeping: Common Requirements for All Parties

- Product Transfer Documents (PTDs) for any Activity as a Transferor/Transferee of OWNERSHIP of Renewable Fuel
- Copies of Reports Submitted to EPA
- Records Related to RIN Transactions
 - List of RINS Owned, Purchased, Sold, or Retired
 - Parties Involved in Each Transaction – Transferor, Transferee, and any Broker or Agent
 - Transaction Date
 - Additional Information Related to Details of the Transaction and its Terms
- Any Parties Other Than Renewable Producers and Obligated Parties
 - PTDs Associated with Transactions



Recordkeeping: Renewable Producer/Importer Specifics - 1

- Records Related to the Generation and Assignment of RINs by Facility
 - Batch Volume, Batch No., RIN, Renewable Type, Production/Import Date, Lab Results, Additional info related to RIN Generation
- Records Related to the Production/Importation of Neat Motor Fuel and its Use
 - Renewable Fuel Designated by the Producer or Importer as Motor Vehicle Fuel



Recordkeeping: Renewable Producer/Importer Specifics - 2

Verifiable Records -

- The amount and type of fossil fuel and waste material-derived fuel used in producing on-site thermal energy dedicated to the production of ethanol at plants producing cellulosic biomass ethanol through the displacement of 90 percent or more of the fossil fuel normally used in the production of ethanol
- The amount and type of feedstocks used in producing cellulosic biomass ethanol
- The equivalent amount of fossil fuel (based on reasonable estimates) associated with the use of off-site generated waste heat that is used in the production of ethanol at plants producing cellulosic biomass ethanol through the displacement of 90 percent or more of the fossil fuel normally used in the production of ethanol
- The plot plan and process flow diagram for plants producing cellulosic biomass and waste derived ethanol
- The independent third party verification required under 80.1155 for producers cellulosic biomass ethanol and waste derived ethanol



Recordkeeping: Obligated Parties & Renewable Exporters

- Obligated Parties – Gasoline Producers and Importers
- Renewable Exporters
- Records Related to the Use of RINS (by Facility, if Applicable) for Compliance
 - Methods and Variables Used to Calculate the RVO
 - List of RINs Used to Demonstrate Compliance
 - Additional Information Related to Details of RIN Use for Compliance



Reporting: Basics

- EPA will Provide Guidance Documents, Report Instructions and Report Templates
<http://www.epa.gov/otaq/regs/fuels/forms.htm>
- All Reports Must be Signed and Certified as Meeting Applicable Requirements by the Owner or a Responsible Corporate Officer of the Renewable Producer/Importer, Obligated Party, or RIN Owner.
- Submission Through EPA's Central Data Exchange (CDX) Web Portal
 - Personal Accounts
 - Closed Registration (EPA Controlled)
 - Electronic Signature
 - Business Owner/RCO or Their Delegate(s)
 - Digital Certificate Assigned Each Individual
 - Reports Submitted as an Encrypted File Attachment
 - Encryption Performed by a CDX JAVA Applet on the Client Machine Prior to Submission (FIPS 140-2 compliant).
 - File Remains Encrypted Until Processed in OTAQ CBI Facility



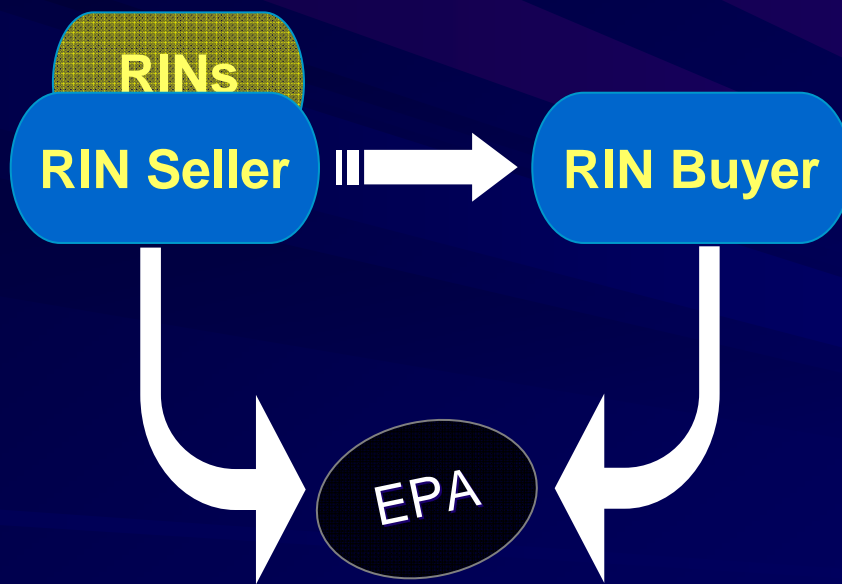
Report Content: Common Requirements for All Parties

- RIN Transaction Reports
 - Submitter's Name, Company ID, and (if applicable) Facility ID
 - Transaction Type (Sale, Purchase, Retire)
 - Transaction Date
 - Trading Partners Name and Company ID (for a sale/purchase)
 - Identification of the RIN
 - Retirement Information (e.g. for Spill, Enforcement Obligation, Use in a Boiler or Heater)



Report Content: Common Requirements for All Parties

▪ RIN Transaction Reports



RIN Sale/Purchase Transaction



RIN Spill Transaction 80.1132



Report Content: Common Requirements for All Parties

- Quarterly Gallon-RIN Activity Reports
 - Submitter's Name, Company ID, and (if applicable) Facility ID
 - Summary of Current-Year RINS (Beginning/Ending Inventory, Sales, Purchases, etc.)
 - Summary of Prior-Year RINS (Beginning/Ending Inventory, Sales, Purchases, etc.)
 - Volume of Renewable Fuel Owned at the End of the Quarter



Report Content: Renewable Producer/Importer – Additional Reports

- RIN Generation Reports
- For Each Batch Produced/Imported:
 - Company Name and Company ID
 - Facility ID
 - Reporting Period
 - RINs Generated for Batch
- Production Date of Batch (Imports – Date Denaturant was Added)
- Renewable Fuel Type (per 80.1101(d))
- Information Related to
 - Volume of Denaturant
 - Applicable Equivalence Value
- Volume of Batch Produced/Imported



Report Content: Renewable Producer/Importer – A Batch?

- What is a Batch?
 - A Discreet Quantity of Renewable Fuel Produced or Imported and Assigned a Unique RIN
 - Are There Limits on a Batch's Quantity?
 - Yes – Whichever Comes First ...
 - Up to a Month's Production; OR
 - Total RINs Generated Up to 99,999,999 gallon RINs
- Incorrect!** ■ Example 1:
99,999,999 Gallons of Biodiesel with an EV = 1.5, Yields 149,999,997 RINs
- OK** ■ Example 2:
66,666,666 Gallons of Biodiesel with an EV = 1.5, Yields 99,999,999 RINs



Report Content: Obligated Parties & Renewable Exporters – Additional Reports

- Annual Compliance Demonstration
 - Obligated Party's Name
 - Company ID
 - **Compliance Basis**
 - Corporate (Aggregated)
 - Facility-By-Facility (Separate Report for Each Facility)
 - Include Facility ID
 - Production Volume of ALL Products Listed in 80.1107(c)
 - Renewable Volume Obligation (RVO)
 - Obligated Parties – 80.1127(a)
 - Exporters of Renewable Fuel - 80.1130(b)
 - Deficit RVO Carried Over from the Prior Year
 - Total Current-Year RINs Used for Compliance
 - Total Prior-Year RINs Used for Compliance
 - Deficit RVO to be Carried into the Next Compliance Year
- Annual List of RINs Used for Compliance

Reference 80.1152(a)



Report Content: Obligated Parties & Renewable Exporters – Compliance Basis

- Separate Compliance Reporting for Refining and Importing
- For an Importer – Compliance is Always on the Aggregate
- For a Refiner - There are Two Options for Compliance
 - Corporate (Aggregated)
 - Facility-By-Facility (Separate Report for Each Facility)
 - There is no Hybrid Compliance Model – Either All Aggregated or All Facility-By-Facility



RFS Reports: Basics

- Electronic Reports – Simple, Spreadsheet (Flat File) Format
- Key Components
 - Instructions – Roadmap, List of Codes, References
 - Overhead Information (Common Information)
 - Individual Report Instructions
 - Templates
 - Spreadsheet Version of each Complete Report
 - Use as a Reference, or
 - Enter Report Information Directly



RFS Reports: Instructions – DRAFT Overhead

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
1.	Report Form ID		<p>AAAAAAA; <i>Character.</i> Enter the <u>one</u> appropriate Report Form ID from the following.</p> <p>RFS0100: Renewable Fuel Standard Activity Report RFS0200: Renewable Fuel Standard Transfer Report RFS0300: Renewable Fuel Standard Obligated Party Annual Compliance Report RFS0400: Renewable Fuel Standard Batch Report</p>
2.	Report Type		<p>A; <i>Character.</i> Submit only one Original report, submit any corrections or updates as Resubmission(s): O: Original R: Resubmission</p>
3.	CBI		<p>A; <i>Character.</i> Specify if the data contained within the report is claimed as Confidential Business Information (CBI) under 40 CFR Part 2, subpart B: Y: Confidential Business Information N: Non-Confidential Business Information</p>
4.	Report Date		<p>MM/DD/YYYY; <i>Character.</i> This is the date the original or resubmitted report is created.</p>
5.	Report Year		<p>YYYY; <i>Character.</i> Compliance period the report covers.</p>



RFS Reports: Instructions – DRAFT Overhead

6.	Compliance Period Code		AA ; <i>Character</i> . Compliance Period Codes. General month ranges are provided below to assist in labeling quarters: Quarterly Q1 : First Quarter (January – March) Q2 : Second Quarter (April – June) Q3 : Third Quarter (July – September) Q4 : Fourth Quarter/Annual (October – December)
7.	Company/Entity ID		AAAA ; <i>Character</i> . The four <i>Character</i> EPA-assigned ID for a company/entity (refiner, importer, etc.).
8.	Company Name		AAAAAAA ; <i>Character</i> . The reporting party's name.



RFS Reports: Instructions – DRAFT RIN Transaction Report

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
9.	Compliance Basis/ Facility ID		<p>AAAAA; <i>Character</i>. Indicate the compliance basis if aggregating or submit separate facility-by-facility reports referencing individual facility ID numbers here. Please include any preceding zeros.</p> <p>AGIMP: Aggregated Importer Compliance AGREF: Aggregated Refiner Compliance ##### : The five <i>Character</i> EPA-assigned facility ID</p>
10.	Transfer Type		<p>AA; <i>Character</i>. Separately report deliveries and receipts. Specify whether this report is for RINs delivered to or RINs received from the identified partner or if this report is documenting Retired RINs.</p> <p>PR: Purchased RIN SR: Sold RIN RR: Retired RIN</p>
11.	Retired RIN Code		<p>AAA; <i>Character</i>. Categorize Retired RINs or enter NA if not applicable.</p> <p>NA: Not Applicable RSP: Reportable Spill § 80.1132 RIV: Import Volume correction under § 80.1166(k) RBH: Renewable fuel used in Boiler or Heater under § 80.1129(e) REO: Enforcement Obligation</p>
12.	Transfer Date		<p>MM/DD/YYYY; <i>Character</i>. Enter the date the RIN transaction was completed.</p>



RFS Reports: Instructions – DRAFT RIN Transaction Report

13.	Trading Partner Name		AAAAA...; Character (125 Max). Enter the name of the entity you conducted the transaction with. In the case where a RIN is retired enter NA .
14.	Trading Partner Company ID		AAAA; Character. Enter the four-character, EPA-assigned ID for your trading partner. In the case where a RIN is retired re-enter your own ID.
15.	RIN	gallons	<p>KYYYYCCCCFFFFBBBBRRDSSSSSSSSEEEEEEE; <i>Character (max 38).</i> Renewable Identification Numbers (RINs). Please refer to § 80.1125.</p> <p>Create one record for each batch and non-continuous sequence of RINS within a batch transferred to a trading partner. For example, if RINs 1-100 from one batch are traded, then the SSSSSSSSEEEEEEE section should look like this 000000100000100. If RINs 1-50 and 75-125 are traded the submitting party should submit two reports one with the SSSSSSSSEEEEEEE 000000100000050 the other with 000007500000125. The SSSSSSSSEEEEEEE is user for example, all reports should show the entire RIN, like in the following examples:</p> <p>12007999979999000011020000000100000050 12007999979999000011020000007500000125</p>



RFS Reports: Templates

■ Spreadsheet Sample

## Test Refiner Third Quarter 2007 RIN Transfer Report														
## 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
RFS0200	O	Y	11/21/2007	2007	Q3	1234	Test Refiner	AGREF	B U Y	NA	09/10/2007	Test Seller	9876	1200799997999900 0011020000000100 000050
RFS0200	O	Y	11/21/2007	2007	Q3	1234	Test Refiner	AGREF	B U Y	NA	09/10/2007	Test Seller	9876	1200799997999900 00110200000007500 000125

■ Text Line Sample

RFS0200,O,Y,11/21/2007,2007,Q3,1234,Test Refiner,AGREF,BUY,NA,
09/10/2007,Test Seller,9876,12007999979999000011020000000100000050

RFS0200,O,Y,11/21/2007,2007,Q3,1234,Test Refiner,AGREF,BUY,NA,
09/10/2007,Test Seller,9876,12007999979999000011020000007500000125



RFS Reports: Packaging & Submitting

- Any and All Reports may be Combined into a Single File (Single Worksheet)

## Test Refiner Third Quarter 2007 RIN Transfer Report														
## 1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
RFS0200	O	Y	11/21/2007	2007	Q3	1234	Test Refiner	AGREF	B U Y	NA	09/10/2007	Test Seller	9876	120079999799 990000110200 000001000000 50
RFS0100	Insert Activity Reports													
RFS0300	Insert Annual Reports and List of RINs													
ETC	Insert any Number of Reports in any Order													

- Submit Completed Report File via CDX Portal



Need More Information?

Q&A Document – RFS Web page:

<http://www.epa.gov/otaq/renewablefuels/>

Fuels Programs Reporting Forms Web Page –
“RFS Reporting Forms”:

<http://www.epa.gov/otaq/regs/fuels/forms.htm>

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