

Registration, Recordkeeping, and Reporting Requirements

U.S. EPA
Office of Transportation and Air
Quality



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Renewable Fuels Standard (RFS)
Clean Fuels Clearing House
October 30th, 2007



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



Reporting: Basics

- EPA Provides 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

- If you did not have any RIN transactions in a quarter, there is no need to report for that quarter
- 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

- 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



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 – 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>. Indicate whether this is the original report or a resubmission. Submit only one original report. Submit any corrections or updates as resubmission(s):</p> <p>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:</p> <p>Y: Confidential Business Information N: Non-Confidential Business Information</p>
4.	Report Date		<p>MM/DD/YYYY; <i>Character</i>. Enter the date the original or resubmitted report is being submitted.</p>
5.	Report Year		<p>YYYY; <i>Character</i>. Indicate the compliance period (year) of the report.</p>



RFS Reports: Instructions – Overhead

6.	Company/Entity ID		AAAA ; <i>Character</i> . Enter your four-digit, EPA-assigned company/entity ID.
7.	Company Name		AAAAAAA... ; <i>Character (125 max.)</i> . Enter the reporting party's name (your company name).



RFS Reports: Instructions – RIN Activity Report (RFS0100)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
8.	Compliance Period Code		<p>AA; Character. Compliance Period Codes. General month ranges are provided below to assist in labeling quarters:</p> <p>Quarterly</p> <p>Q1: First Quarter (January – March)</p> <p>Q2: Second Quarter (April – June)</p> <p>Q3: Third Quarter (July – September)</p> <p>Q4: Fourth Quarter/Annual (October – December)</p>
9.	Compliance Basis/ Facility ID		<p>AAAAA; <i>Character</i>. Obligated Parties: Indicate the compliance basis if aggregating facilities in a single report, or submit separate facility reports referencing individual facility ID numbers. Please include all zeros in the five-digit facility ID numbers. Non-Obligated Parties, including producers of renewable fuels and other RIN Owners: Use “NOTOP”.</p> <p>AGIMP: Aggregated Importer Compliance</p> <p>AGREF: Aggregated Refiner Compliance</p> <p>##### : Five-digit EPA-assigned facility ID</p> <p>EXPRT: Exporter Compliance</p> <p>NOTOP: Non-Obligated Party (RIN Generator or Owner)</p>



RFS Reports: Instructions – RIN Activity Report (RFS0100)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
10.	RIN Status		<p>9; Number. Indicate whether the report is being submitted for RINs assigned to a volume of renewable fuel (K code = 1) or for RINs that have been separated from or are otherwise unassigned to a volume of renewable fuel (K code = 2). See 40 CFR 80.1125(a). A separate RFS Activity Report must be submitted for each type of RIN owned.</p> <p style="padding-left: 40px;">1: Assigned RINs 2: Separated RINs</p>
11.	Volume of renewable fuel owned at the end of the quarter	gallons	9999999...; Number (16 max.) . Enter the total volume of renewable fuel owned at the end of the period per §80.1152(c)(2)(xviii). If not applicable, enter “0”.
12.	Current-year gallon-RINs owned at the start of the quarter		9999999...; Number (16 max.) . Enter the total number of current-year gallon-RINs owned at the start of the period. If not applicable, enter “0”.
13.	Current-year gallon-RINs purchased		9999999...; Number (16 max.) . Enter the total number of current-year gallon-RINs purchased for the period. If not applicable, enter “0”.
14.	Current-year gallon-RINs sold		9999999...; Number (16 max.) . Enter the total number of current-year gallon-RINs sold for the period. If not applicable, enter “0”.
15.	Current-year gallon-RINs retired		9999999...; Number (16 max.) . Enter the total number of current-year gallon-RINs retired for the period. If not applicable, enter “0”.
16.	Current-year gallon-RINs owned at the end of the quarter		9999999...; Number (16 max.) . Enter the total number of current-year gallon-RINs owned at the end of the period. If not applicable, enter “0”.



RFS Reports: Instructions – RIN Activity Report (RFS0100)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
17.	Prior-year gallon-RINs owned at the start of the quarter		9999999... ; <i>Number (16 max.)</i> . Enter the total number of prior-year gallon-RINs owned at the start of the period. If not applicable, enter "0".
18.	Prior-year gallon-RINs purchased		9999999... ; <i>Number (16 max.)</i> . Enter the total number of prior-year gallon-RINs purchased for the period. If not applicable, enter "0".
19.	Prior-year gallon-RINs sold		9999999... ; <i>Number (16 max.)</i> . Enter the total number of prior-year gallon-RINs sold for the period. If not applicable, enter "0".
20.	Prior-year gallon-RINs retired		9999999... ; <i>Number (16 max.)</i> . Enter the total number of prior-year gallon-RINs retired for the period. If not applicable, enter "0".
21.	Prior-year gallon-RINs owned at the end of the quarter		9999999... ; <i>Number (16 max.)</i> . Enter the total number of prior-year gallon-RINs owned at the end of the period. If not applicable, enter "0".



RFS Reports: Instructions – RIN Transaction Report (RFS0200)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
8.	Compliance Period Code		<p>AA; Character. Compliance Period Codes. General month ranges are provided below to assist in labeling quarters:</p> <p>Quarterly</p> <p>Q1: First Quarter (January – March)</p> <p>Q2: Second Quarter (April – June)</p> <p>Q3: Third Quarter (July – September)</p> <p>Q4: Fourth Quarter/Annual (October – December)</p>
9.	Compliance Basis/ Facility ID		<p>AAAAA; Character. Obligated parties: Indicate the compliance basis if aggregating facilities in a single report, or submit separate facility reports referencing individual facility ID numbers. Please include all zeros in the five-digit facility ID numbers. Non-obligated parties, including producers of renewable fuels and other RIN owners: Enter “NOTOP”.</p> <p>AGIMP: Aggregated Importer Compliance (Obligated Parties)</p> <p>AGREF: Aggregated Refiner Compliance (Obligated Parties)</p> <p>##### : The five Character EPA-assigned facility ID (Obligated Parties)</p> <p>EXPRT: Aggregated Exporter Compliance (Obligated Parties (Exporters of renewable fuel))</p> <p>NOTOP: Non Obligated Party (RIN Generator or Owner)</p>



RFS Reports: Instructions – RIN Transaction Report (RFS0200)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
10.	Transfer Type		<p>AAA; <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>BUY: Purchased RIN SEL: Sold RIN RET: Retired RIN</p>
11.	Retired RIN Code		<p>AAA; <i>Character</i>. Categorize retired RINs or enter “NA” if the reported transaction is a “BUY” or “SEL” (in Field 10).</p> <p>RSP: Reportable spill under § 80.1132 RCF: Contaminated or spoiled fuel that is not usable RIV: Import volume correction under § 80.1166(k) RBH: Renewable fuel used in boiler or heater under -§ 80.1129(e) RNR: Renewable fuel designated for non-road use RIR: Invalid RIN per §80.1131 RVC: Volume error correction per §80.1131 REO: Enforcement obligation as defined by the federal government USE: RIN used to demonstrate annual compliance</p>
12.	Transaction date		<p>MM/DD/YYYY; <i>Character</i>. Enter the date that the RIN transaction was completed.</p>
13.	Transaction partner name		<p>AAAAA...; <i>Character (125 Max)</i>. Enter the name of the company you conducted the transaction with. In the case of a retired RIN, enter “NA”</p>



RFS Reports: Instructions – RIN Transaction Report (RFS0200)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
14.	Transaction partner company ID		<p>AAAA; <i>Character</i>. Enter the four-digit, EPA-assigned company ID for your transaction partner. In the case of a retired RIN, enter "NA".</p>
15	RIN		<p>KYYYYCCCCFFFFFFBBBBRRDSSSSSSSSEEEEEEEE; Number (38 Digits). Renewable Identification Number (RIN). Refer to § 80.1125.</p> <p>Create one report for each batch or for each continuous sequence of RINS within a batch which was transferred to your transaction partner.</p> <p>Example 1: Gallon-RINs 1-100 from one batch are traded, therefore the batch RIN would look like this: 12007999979999000011020000000100000100.</p> <p>Example 2: Gallon-RINs 1-50 and 76-125 from one batch have been traded, therefore two reports should be submitted for the transaction and the two batch-RINs would look like this: 12007999979999000021020000000100000050 12007999979999000021020000007600000125</p>



RFS Reports: Instructions – RIN Transaction Report (RFS0400)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
8.	Compliance Period Code		<p>AA; Character. Compliance Period Codes. General month ranges are provided below to assist in labeling quarters:</p> <p>Quarterly</p> <p>Q1: First Quarter (January – March)</p> <p>Q2: Second Quarter (April – June)</p> <p>Q3: Third Quarter (July – September)</p> <p>Q4: Fourth Quarter/Annual (October – December)</p>
9.	Facility ID		<p>AAAAA; <i>Character</i>. Enter the five-digit EPA-assigned facility ID of the facility that produced or imported the renewable fuel for which the batch of RINs was generated.</p>
10.	Production Date		<p>MM/DD/YYYY; <i>Character</i>. Enter the date the reported batch was produced or imported.</p>



RFS Reports: Instructions – RIN Transaction Report (RFS0400)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
11	Equivalence Value		9.9 ; <i>Number</i> . Enter the equivalence value for the reported batch of renewable fuel as defined in §80.1115.
12	Batch Volume	gallons	99999999 ; <i>Number</i> . Enter the production or import volume of the reported batch of renewable fuel.
13	Denaturant Volume	gallons	99999999 ; <i>Number</i> . Enter the volume of denaturant added to the reported batch of renewable fuel prior to the generation of RINs. Enter “0” if not applicable.
14	RIN		KYYYYCCCCFFFFFFBBBBRRDSSSSSSSSEEEEEEE ; <i>Number (38 Digits)</i> . Renewable Identification Number (RIN) per § 80.1126. Create one report for each batch of RINS generated. For example, for a 1000 gallon batch of denatured ethanol, show the entire batch-RIN like in the following example: 12007999979999000011020000000100001000



RFS Reports: Instructions – RIN Transaction Report (RFS0400)

No.	Field Name	Units	Field Formats, Codes, & Special Instructions
15	Renewable Fuel Type		<p>AAA999; <i>Character</i>. Enter the type of renewable fuel in the reported batch as defined in §80.1101(d). This field contains 2 parts. The first part is a character code corresponding to the renewable fuel type. The second part is a number corresponding to the feedstock used to produce the renewable fuel.</p> <p>Renewable Fuel</p> <p>ETH: Ethanol other than cellulosic biomass or waste-derived ethanol</p> <p>CBE: Cellulosic biomass ethanol</p> <p>WDE: Waste-derived ethanol</p> <p>BDS: Biodiesel (mono-alky ester)</p> <p>NRD: Non-ester renewable diesel</p> <p>BTL: Butanol</p> <p>BCR: Blending components derived from renewable fuel</p> <p>Feedstock</p> <p>001: Grain</p> <p>002: Starch</p> <p>003: - 014: See instructions online</p> <p>1XX: Multiple feedstocks used in a batch (select the 3-digit number that represents the majority feedstock and replace the leading 0 with a 1 -- e.g. 101 if grain is the majority feedstock)</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	1234	Test Refiner	Q3	NOTOP	BUY	NA	09/10/2007	Test Seller	9876	120079999799990000110200000010000050	
RFS0200	O	Y	11/21/2007	2007	1234	Test Refiner	Q3	NOTOP	BUY	NA	09/10/2007	Test Seller	9876	1200799997999900001102000000750000125	

■ Text Line Sample

RFS0200,O,Y,11/21/2007,2007,1234,Test Refiner,Q3,NOTOP,BUY,NA,09/10/2007,Test Seller,9876,120079999799990000110200000010000050

RFS0200,O,Y,11/21/2007,2007,1234,Test Refiner,Q3,NOTOP,BUY,NA,09/10/2007,Test Seller,9876,1200799997999900001102000000750000125



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	1234	Test Refiner	Q3	NOTOP	B U Y	NA	09/10/2007	Test Seller	9876	12007999979 99900001102 00000001000 00050
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



CDX Overview

- Highly Secure online submission and signature system
- Can be used to submit all your EPA part 79 and 80 fuels reports (RFG, Diesel Sulfur, Gasoline Sulfur, Fuels and Fuel Additives) at the same time
- Used by all 50 states and other EPA organizations
- Free to you*
- Easy to use

* (OTAQ will cover the digital certification costs for up to 5 submitters per entity)



CDX Agent Delegation

- Third Party's may submit reports via CDX on behalf their clients.
 - In order to do so they must follow the instructions on the CDX Information Page to register
<http://epa.gov/otaq/regs/fuels/cdxinfo.htm>
 - Their Clients must mail in a properly filled out responsible corporate officer submission letter which is located at
<http://epa.gov/otaq/regs/fuels/cdxinfo.htm#rcoletter>



How to Register

- Reminder this is different from Company Registration!
- Don't wait until the last minute!
- Please note CDX is a highly secure system and that it will take a few business days for EPA and our partners to establish your accounts and digital signatures.
- Once set up the CDX is not only very safe but very easy to use.



How to Register (Delegation)

- Decide who you want to submit your entity's reports (Up to 5 individuals)
- Fill out the CDX Delegation/ Submitter Form at (<http://www.epa.gov/otaq/regs/fuels/fuelsregistration.htm>) and have a responsible corporate officer sign it.
- Mail it to:

Via US Mail

Fuel CDX Programs

1200 Pennsylvania Ave NW

Mail Code:6406J

Washington, DC 20460

Via Private Courier

Fuel CDX Programs

1310 L St NW Suite 613K

Mail Code:6406J

Washington, DC 20005



How to Register (CDX Registration)

- After we receive your delegation via mail or the internet we will process it.
- Within a few days expect an email from the CDX HELP DESK inviting you to retrieve your Customer Retrieval Key (CRK) to register with CDX.
- Go to <http://cdx.epa.gov> and follow the instructions that will be provided to you



How to Register (Digital Signatures)

- After registering for CDX you will be asked to sign a digital signature agreement please sign, fax and mail it to us ASAP (see below)
- After we receive your digital signature agreement we go through a process to create your signature.
- A digital signature is the digital equivalent of your wet ink signature. *Keep it safe.*

Via US Mail

Fuel CDX Programs

1200 Pennsylvania Ave NW

Mail Code:6406J

Washington, DC 20460

Via Private Courier

Fuel CDX Programs

1310 L St NW Suite 613K

Mail Code:6406J

Washington, DC 20005



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>

For extra assistance call (202) 343-9755

or email: EPAFuelsPrograms@epa.gov