

# RFS2 NPRM EMTS Discussion

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U.S. Environmental Protection Agency  
Office of Transportation and Air Quality

# Outline

- (Re)registration Requirements
- Registration & EMTS Reporting Interaction
- New RFS 2 Requirements
- New Reporting Requirements
- RFS 2 Transition

# (Re)registration Requirements – Current OTAQ Process

The screenshot displays the EPA MyCDX OTAQ Registration web application. At the top right, the text "U.S. Environmental Protection" is visible. The main header is "OTAQ Registration" with a breadcrumb trail: "MyCDX > OTAQ Registration Home > OTAQ Registration". A "Logged in as," indicator is present in the top right corner. On the left side, there is a vertical navigation menu with the EPA logo and links for "About CDX", "MyCDX", "Inbox", "Change Password", "Frequently Asked Questions", "Help & Support", "CDX Home", "Terms & Conditions", and "Logout".

The main content area is titled "Edit Company Information" and contains two tabs: "Company Details" (selected) and "Associated Facilities". Below these are sub-tabs for "Associated Facilities" and "Facility Search". The "Facility Search" sub-tab is active, showing a form titled "Enter Facility Data".

The "Enter Facility Data" form includes the following fields:

- Facility ID:
- Name:
- Facility Type:
- Business Activities:   
Dropdown options: Biodiesel Producer, Importer, Independent Lab
- Address:
- City:
- State:
- ZIP:
- Company Id:

At the bottom of the form are "Search" and "Refresh" buttons. Below the form, a red message states: "You are in an encrypted secure session." At the very bottom, there is contact information: "Help Desk: (888) 890-1995", "EPA Home | Privacy and Security Notice | Contact Us", and the URL: "http://www.epa.gov/epahome/usenotice.htm".

In the bottom left corner of the screenshot, there is a small box that says: "Click here for more time: 19:57".

# (Re)registration Requirements – New OTAQ Registration

- Renewable Producers will need to register the following information:
  - Production process(es)
  - Production co-products
  - Engineering review (by Jan 1, 2010 or 60 days prior to the generation of RINs, whichever is later)
  - All possible feedstocks
  - All possible renewable fuels
  - Grandfathering information dates
  - Facility production capacity information
  - Fuels and Fuel Additives Registration (FFARS) ID

# (Re)registration Requirements – New OTAQ Registration

- Information provided during registration will enable certain capabilities in EMTS
- These include the ability to:
  - Generate RIN fuel types from specific feedstocks with specific processes
  - Separate RINs for export, receipt of renewable fuel, etc.
  - Retire RINs for compliance
  - Registration information must be complete and up-to-date to submit files

# (Re)registration Requirements – New OTAQ Registration

- EPA will enable organization accounts in EMTS after information is approved and received
- Only those individuals registered with a submitter role will be able to perform transactions
- All submitters continue to need their own individual account
- RCOs can request a reporting PIN number for their organization to claim sensitive information when submitting batch files via the Exchange Network
  - Only RCOs can request PIN numbers
  - RCOs may provide their organization PIN number to submitters
  - Reports may still be submitted with the Company ID

# Registration and EMTS Reporting Interaction

- The ability to perform functions will be specified by the regulations (40 CFR Part 80 Subpart M)
- Based on registration information, EMTS will determine which organizations can perform certain transactions with RINs

# Registration & EMTS Reporting Interaction – Generation

- Producers identify at registration all possible
  - Feedstocks
  - Processes
  - Co-products
  - Products (Type of Renewable Fuel)
- Information is updated nightly in EMTS
- If any generation information is reported but not registered, submission file will fail
- User interface will not allow specific information to be reported unless information is registered



# Registration & EMTS Reporting Interaction – Generation

- Current fuel pathways that correspond with the NPRM are available with the usage guide
- During generation the same information is still required to be reported
- Every batch of fuel created must include:
  - Feedstocks
  - Co-products
  - Products
  - Production Facility
  - Production Company
  - Renewable biomass indication
  - Volumes/Denaturant

# New RFS2 Requirements

- New reporting requirements have resulted from the Energy Independence and Security Act (EISA) of 2007.
- These include:
  - New RIN fuel types (D Codes)
  - 4 separate Renewable Volume Obligations (RVOs) for obligated parties
  - Renewable biomass definition satisfied or not

# New Reporting Requirements

- Most transactions require users to report associated reason codes
  - Buy
    - Standard trade
    - Correction of improper transfer of RINs
    - Volume correction
  - Sell
    - Standard trade
    - Correction of improper transfer of RINs
    - Volume correction

# New Reporting Requirements

- Separate
  - Receipt (obligated party)
  - Export
  - Blend to produce a motor vehicle fuel
- Retire
  - Use for compliance (only those with RVO)
  - Spillage
  - Volume correction
  - Enforcement obligation

# New Reporting Requirements

- RIN separation reporting will be required
- New RIN fuel types (D Codes)
  - Required on every transaction
  - 4 separate Renewable Volume Obligations (RVOs) for obligated parties
  - Renewable Fuel Standard percentages calculated every year for each RVO category
- Price
  - Per gallon RIN price or per gallon renewable price
  - Both parties must report same price measurement

# New Reporting Requirements

- Volume required on Buy/Sell transactions
  - Renewable fuel volume that is sold with assigned RINs is required when selling assigned RINs
  - Volume amount may be reported with separated RINs if applicable, but it is not required
- Renewable Biomass Indication
  - Identify the batch as renewable biomass or not

# New Reporting Requirements

- To report on time and correctly, industry will need to provide all necessary information and agree to its accuracy
- PTDs must contain the necessary information and allow for the transaction to be reported to the EMTS within 3 days (proposed) of the transaction date

# New Reporting Requirements – Unchanged Reports

- EMTS replaces RFS0200 and RFS0400.
- Current volume holdings (RFS0100) information will still be required on a quarterly basis
- Annual Compliance Reports (RFS0300) will still be required
  - RINS will be retired in EMTS for compliance, but all parties with an RVO must still submit a separate RFS0300 report



## RFS 2 Transition

- **January 1, 2010** – If industry opts-in, EMTS may be implemented early
  - All opt-in parties are required to use EMTS
  - No RINs may be generated outside of EMTSor;
- **January 1, 2011** – EMTS will be mandatory for all industry
- If RFS2 begins after Jan 1, 2010
  - EMTS may be implemented mid-year
  - RINs may only be generated in EMTS after the start date