

Recordkeeping & Reporting for Highway Diesel Fuel



U.S. EPA
**Office of Transportation
and Air Quality**

Recordkeeping, Reporting, & Product Transfer Documents

- Registration of Refiners and Importers
- Recordkeeping Requirements
- Record Retention
- Product Transfer Documents (PTDs)
- Pre-Compliance Reporting
- Initial Confirmation of 15 ppm Fuel Production
- Annual Reporting



Registration

- No additional requirement for companies/facilities currently registered
- Registration for all refiners and importers by 12/31/2001
- Applications for prospective Small Refiners
- Applications for refiners/importers seeking extended GPA gasoline standards



Designation Requirement

- Any refiner or importer shall accurately and clearly designate all fuel it produces or imports for use in diesel motor vehicles as either –
 - Motor vehicle diesel fuel meeting the 15 ppm sulfur standard, or
 - Motor vehicle diesel fuel meeting the 500 ppm sulfur standard



Recordkeeping Requirements

- Records to be kept by parties in the Motor Vehicle Diesel Fuel (MVDF) and MVDF additive distribution system
 - PTDs
 - Sampling or testing information for sulfur, cetane index or aromatics
 - Handling of non-compliant MVDF



Recordkeeping Requirements

(continued)

- Additional records for MVDF subject to temporary refiner relief standards, small refiner standards and early credit provisions
 - Batch information
 - Foreign Refiner and Importers of DFR Fuel
 - Credit information
 - Compliance calculations
 - Credit calculations
 - Copy of reports submitted to EPA
- Additional records importers must keep
 - Records on each batch of certified DFR-diesel and non-certified DFR-diesel imported



Record Retention

- Retain required records 5 years
- Special case for credit transfers
 - Transferor (seller); 5 years from the date the credits were transferred
 - Transferee (buyer); 5 years from the date the credits were transferred, used, or terminated – whichever is later



Product Transfer Documents

- Diesel Fuel PTD Requirements
 - Names & Addresses of transferor/transferee
 - Date of Transfer
 - Volume of MVDF being transferred
 - Location of MVDF at time of transfer
 - Designation of MVDF
 - Tax exempt statement
 - Use of product codes
 - Early credit provisions



Product Transfer Documents

(continued)

- Diesel Fuel Additive PTD Requirements
 - Additives for use downstream of the diesel refiner
 - Additives, having a sulfur content that may exceed 15 ppm, for use downstream of the diesel refiner
 - Use of product codes
 - Labeling of additives sold in containers for use by the ultimate consumer of diesel fuel



Pre-Compliance Reporting

- Refiners & Importers submit pre-compliance reports
 - due June 1st of 2003, 2004, & 2005
 - update corporate/facility registration information
- Information by refinery or CTA (importers)
 - fuel volume estimates
 - credit generation/use estimates
 - information regarding engineering plans, permit status, capital commitments, and actual construction progress



Pre-Compliance Reporting

(continued)

■ Small Refiners

- 500 ppm option – show likely sources of 15 ppm fuel in the area are sufficient
- Small refiner credit option – same as 500 ppm option, plus estimated credits generated and offered for sale
- Diesel/Gasoline Compliance Date Option – show diesel desulfurization is on track and reasonably show the capability to produce 100% of highway diesel fuel at 15 ppm sulfur for at least 85% of baseline volume by 6/1/2006

■ GPA Refiners & Importers

- show diesel desulfurization is on track and reasonably show the capability to produce 100% of highway diesel fuel at 15 ppm sulfur for at least 85% of baseline volume by 6/1/2006



Initial Confirmation . . .

. . . of 15 ppm Fuel Production

- Small Refiners - Diesel/Gasoline Compliance Date Option
- Refiners - Extension of the GPA gasoline sulfur standard
- by July 1, 2006 confirm that they began on June 1, 2006, producing 100% of their highway diesel fuel at 15 ppm sulfur.



Annual Reporting

- First reporting period 6/1/2006 – 12/31/2006; due last day of February 2007
- Early credit generation requires annual reporting
- Reports are due the last day of February for the preceding reporting period
- Last reporting period 2010; due last day of February 2011



Annual Reporting (continued)

Required Elements – all refiners & importers; for each refinery and CTA

- Highway diesel fuel volume
 - volume of 15 ppm sulfur fuel from crude
 - volume of 500 ppm sulfur fuel from crude
 - volumes of each grade of fuel from other sources
- Credits used to demonstrate compliance
- Credits generated



Annual Reporting (continued)

Additional Information – Small Refiners

- 500 ppm Option and Small Refiner Credit Option
Production of 500 ppm sulfur highway diesel fuel meets the lesser of:
 - 105% of average production for 1998/1999
or
 - Average production for 2004/2005
- Diesel/Gasoline Compliance Date Option
Confirm 100% production of 15 ppm sulfur fuel and volume of at least 85% of baseline volume



Reporting Elements

Refiner Name and EPA ID (company ID)

Refinery Name/CTA and EPA ID (facility ID)

Total volume (gal.) of MVDF produced

Total volume (gal.) of MVDF complying with 500 ppm std.

Total volume (gal.) of MVDF complying with 15 ppm std.

Percent of MVDF that met 500 ppm std. before credits

Percent of MVDF that met 15 ppm std. before credits

Percent of MVDF that met 15 ppm std. after credits

Credit/Debit information-

CTA of the refiner's refinery, importer, foreign refiner

Name of port of importation

Reporting Elements (continued)

Number of credits at the start of the compliance period

Number of credits generated

Number of credits used

Credit transfer information

- Names of parties and EPA Ids (Company/facility)

- Address

- CTA

- Number of Credits

Credit carryover/Credit deficit

Foreign Refiner Reporting

- Requirements of 80.620 if applicable

Reporting Elements (continued)

Batch Reporting

Batch number

Product Designation

Production/Import Date

Batch Volume (gal.)

Additional Reporting for Importers

Importer Name and ID

Importer Reports required under 80.620 (o). Batch classifications, independent sampling and testing results

Submission

Signed and certified by a responsible corporate officer

Guidance & Report Forms

- EPA will issue guidance and reports next spring similar to those for Tier 2/Gasoline Sulfur Reporting
- We plan to make submissions as “electronic” as possible using spreadsheet and flat file templates
- Guidance and report templates will be posted on EPA’s website

Guidance:

www.epa.gov/otaq/regs/fuels/diesel/diesel.htm

Reports:

www.epa.gov/otaq/regs/fuels/forms.htm



Reporting Questions?

- E-mail reporting questions and comments to:

John Weihrauch
weihrauch.john@epa.gov

