



# Set Rule Implementation Webinar Introduction

Mary Manners

Office of Transportation and Air Quality

September 7, 2023



# About this Workshop

- Welcome
- Why we're here
- What to expect

# About the Presentations

- The presentations are being given to assist stakeholders in complying with the regulations regarding the Renewable Fuel Standard (RFS) Program: Standards for 2023-2025 and Other Changes Final Rule (Set Rule).
- The presentations are not intended to discuss the merits of the regulatory requirements but rather to assist stakeholders in implementing them.
- To the extent participants provide questions, advice, or materials during or after this meeting, they should do so in their individual capacity.
- These presentations are not intended to supplant the regulatory requirements. Parties must comply with the applicable regulatory requirements regardless of whether and how those requirements are discussed in these presentations.
- The topics in these presentations do not represent present or future EPA decisions or actions in any particular circumstance and do not bind EPA to any particular decision or action.

# Ground Rules

- This workshop is about complying with the regulatory requirements, not to debate the merits of those requirements
  - Attendees are muted
  - Chat and reactions are turned off
- During the presentation, email generally applicable questions about implementation of the regulations to: [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)
  - After the workshop or for questions around specific situations, ask questions through the Fuels Program Helpdesk at: [FuelsProgramSupport@epa.gov](mailto:FuelsProgramSupport@epa.gov)
- Generally applicable questions about implementation of the regulations will be answered after all presentations
- Presentations will be posted at: <https://www.epa.gov/renewable-fuel-standard-program/rfs-set-rule-implementation-webinar>

# Set Rule Components

- Three main components of the Set Rule:
  - RFS Standards for 2023-2025
  - The Biogas Regulatory Reform Rule (BRRR)
  - Technical amendments to the RFS program
- Today's webinar focuses on the technical amendments to the RFS program and provides a brief overview of BRRR

# Agenda

<b>Time (EDT)</b>	<b>Topic</b>	<b>Presenter</b>
1:00 pm	Introduction	Mary Manners
1:10 pm	Overview of Set Rule Implementation	Robert Anderson
1:30 pm	Biogas Regulatory Reform Rule (BRRR) Overview	Robert Anderson
1:50 pm	Mixed Digesters	Kurt Gustafson
2:00 pm	Break	
2:15 pm	Demo of Feedstock Aggregator Registration	Angelina Feldman
2:45 pm	ER Changes and PE Independence Requirements	Jaimee Dong
3:15 pm	Break	
3:30 pm	Moderated Q&A	Robert Anderson
4:00 pm	Closing	Mary Manners



For the Q&A portion of this workshop, email generally applicable questions about implementation of the regulations to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)



# Set Rule Implementation

## *An overview*

Robert Anderson

Office of Transportation and Air Quality

September 7, 2023

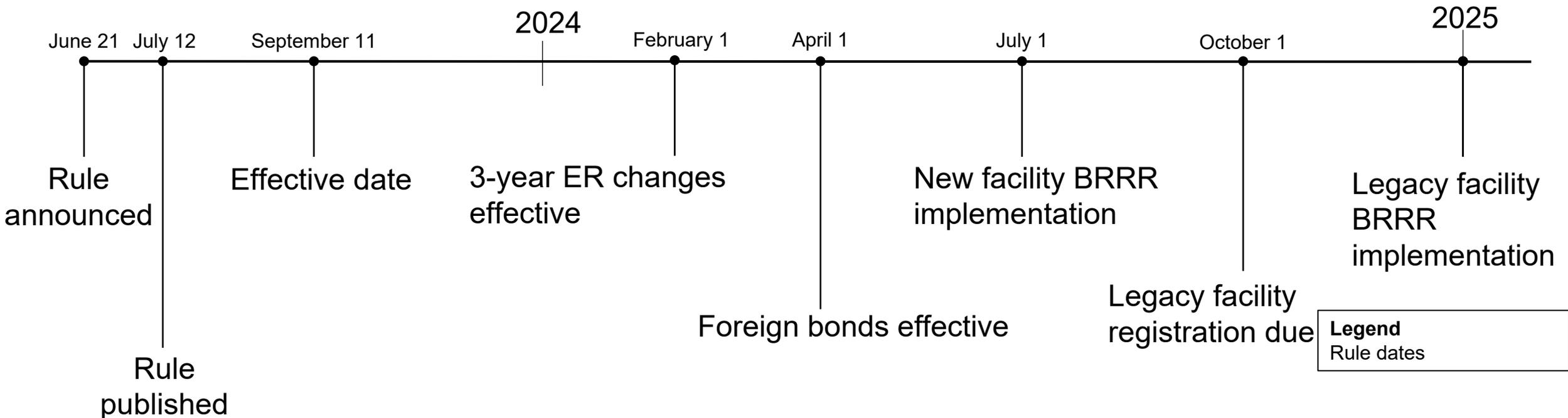
# Summary of Regulatory Provisions

- **Biogas Reg Reform Rule (BRRR)**
  - Updated biogas provisions to better track biogas and allow for biogas to be used as a biointermediate
- **Mixed Digesters**
  - Updated provisions for mixing multiple feedstocks in digesters
- **Three-Year Registration Updates (3YU)**
  - Clarified 3-year engineering review due dates and requirements on which data must be evaluated to verify RIN generation (VRIN calculations)
- **Third-Party Enhancements**
  - Strengthened independence requirements for professional engineers (PE) and Quality Assurance Program (QAP) auditors
- **Separated Food Waste (SFW) Records**
  - Created an alternative recordkeeping option for separated food waste and confirmed third-party agent option
- **Foreign Bonds**
  - Increased bond amount for foreign RIN generators/owners and removed treasury check option
- **Minor Tech Amendments:**
  - Updated definition of ocean-going vessel
  - Established requirements for PEs to visit all MSW separation facilities
  - Clarified when parties can generate RINs

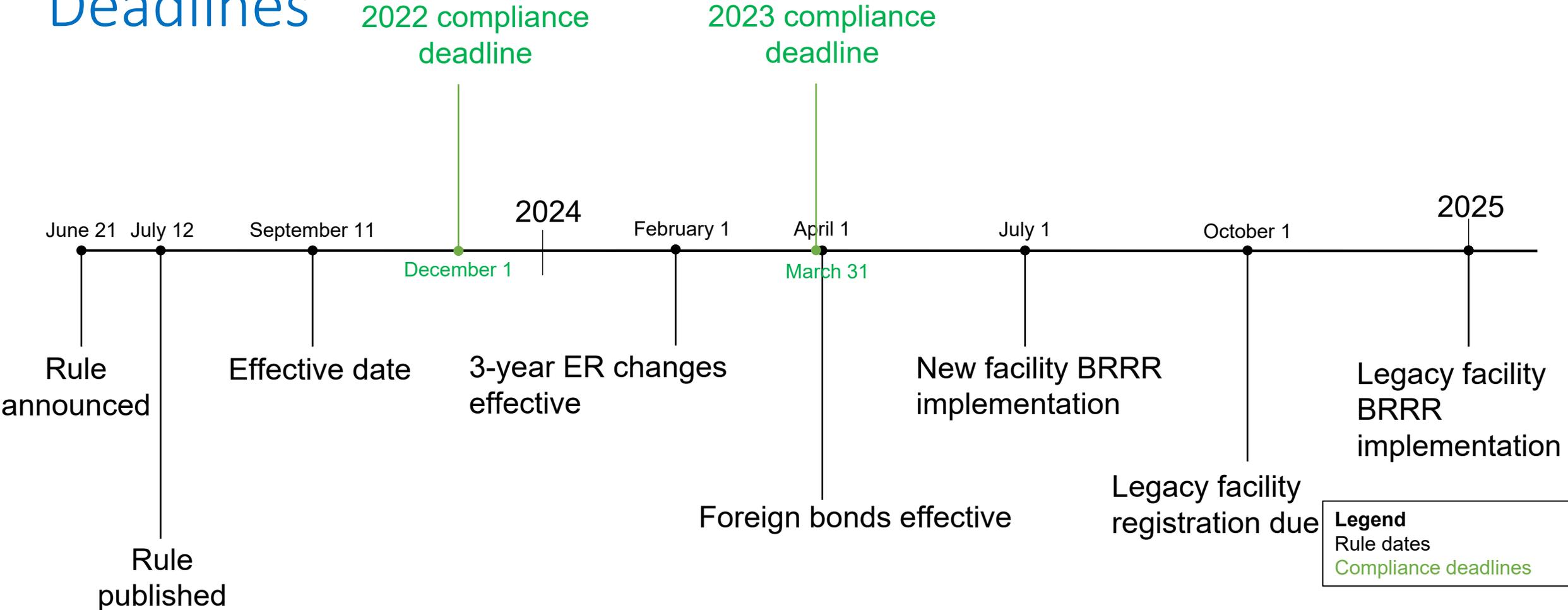
# Key Implementation Steps

- BRRR
  - Update OTAQReg to allow for biogas producer, RNG producer, and CNG/LNG dispenser to register under BRRR
  - Update EMTS to track biogas and RNG
  - Review new QAPs for BRRR
- Mixed Digesters
  - Update registration procedures and EMTS for mixed digester provisions
- Three-Year Registration Updates (3YU)
  - Update posted calendar for 3-year ER due dates
  - Update ER form for  $V_{RIN}$  calculation compliance
- Third-Party Enhancements
  - Add independence statement for PEs to sign as part of registration submissions
  - Integrate new independence requirements into 2024 QAP plans
- SFW Records
  - Update OTAQReg for feedstock aggregator registration
  - Implement association between feedstock aggregators and renewable fuel producers in OTAQReg
- Foreign Bonds
  - Directly work with affected foreign parties to update bonds

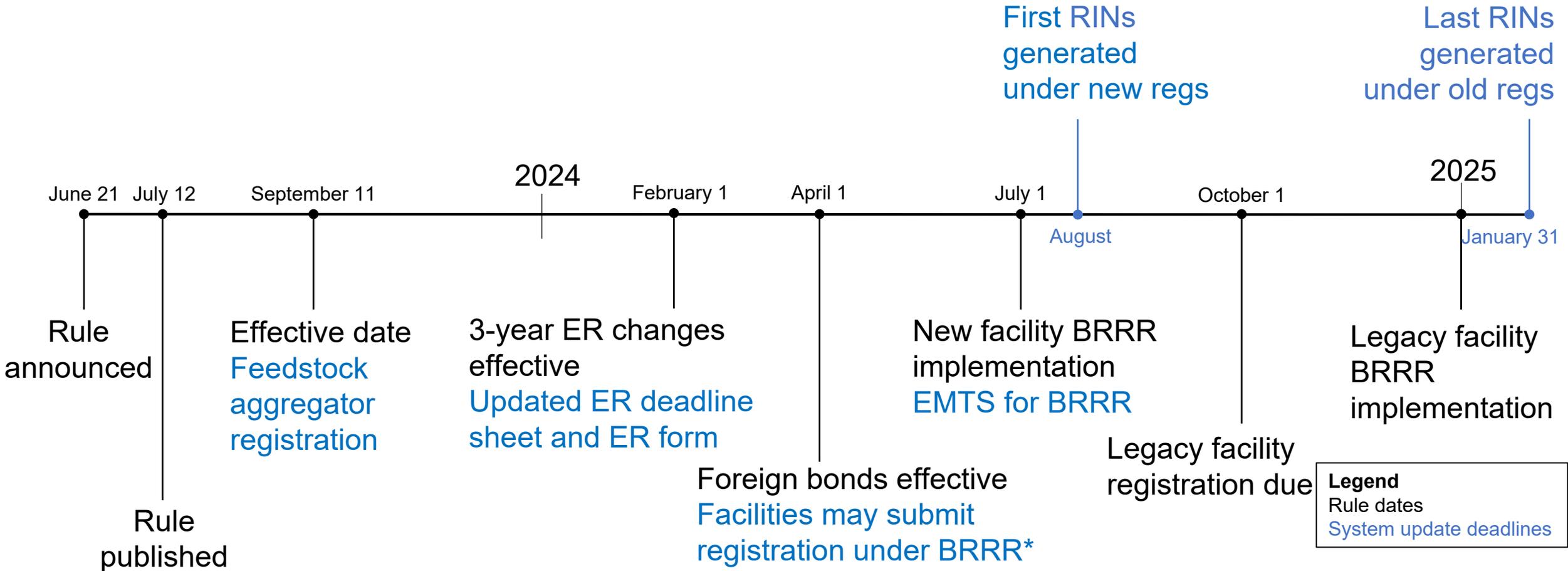
# Timeline for Regulatory Dates



# Timeline for Regulatory Dates with Compliance Deadlines

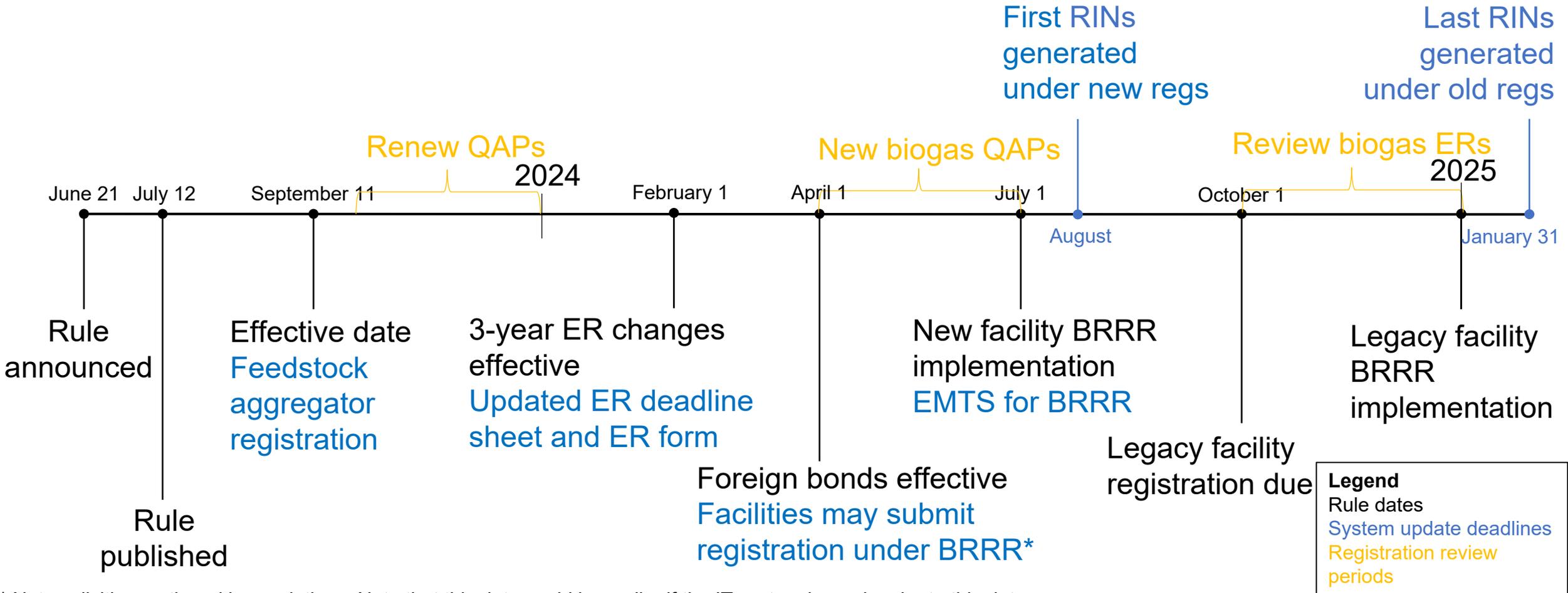


# Timeline for EPA Implementation



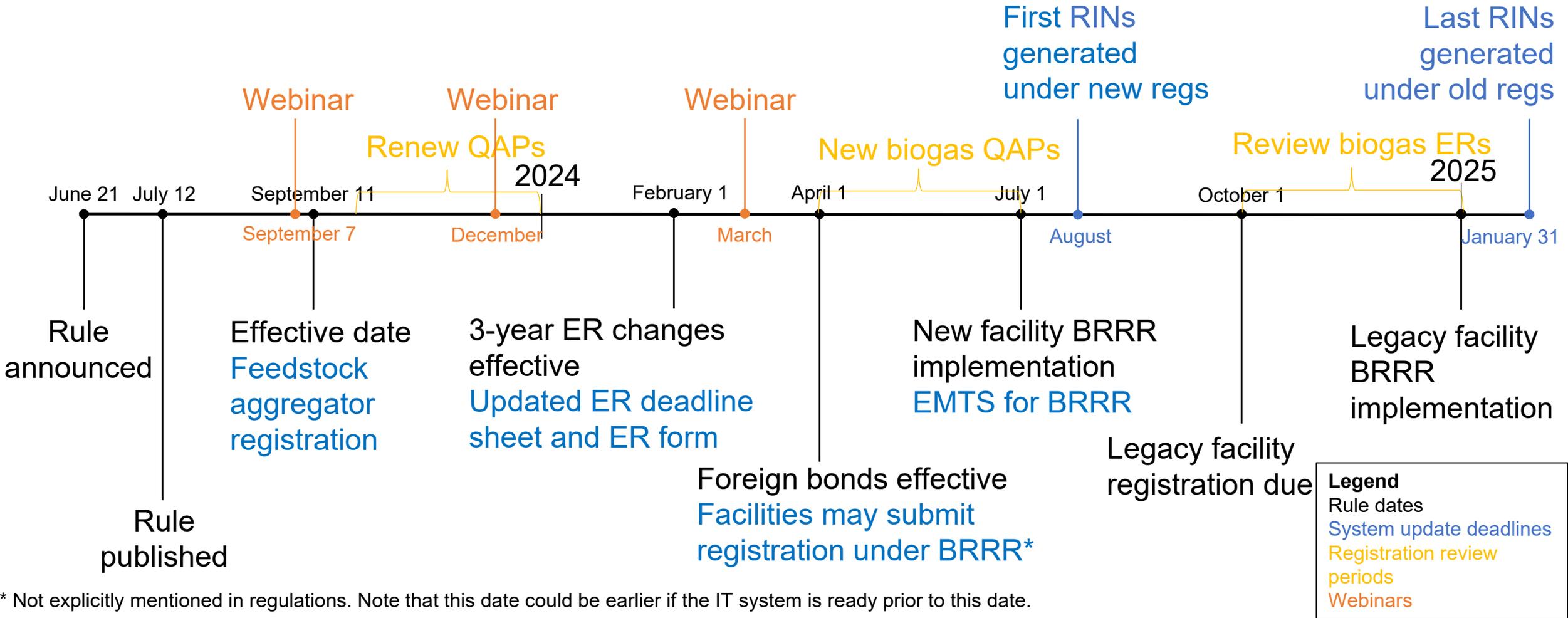
\* Not explicitly mentioned in regulations. Note that this date could be earlier if the IT system is ready prior to this date.

# Timeline for EPA Review

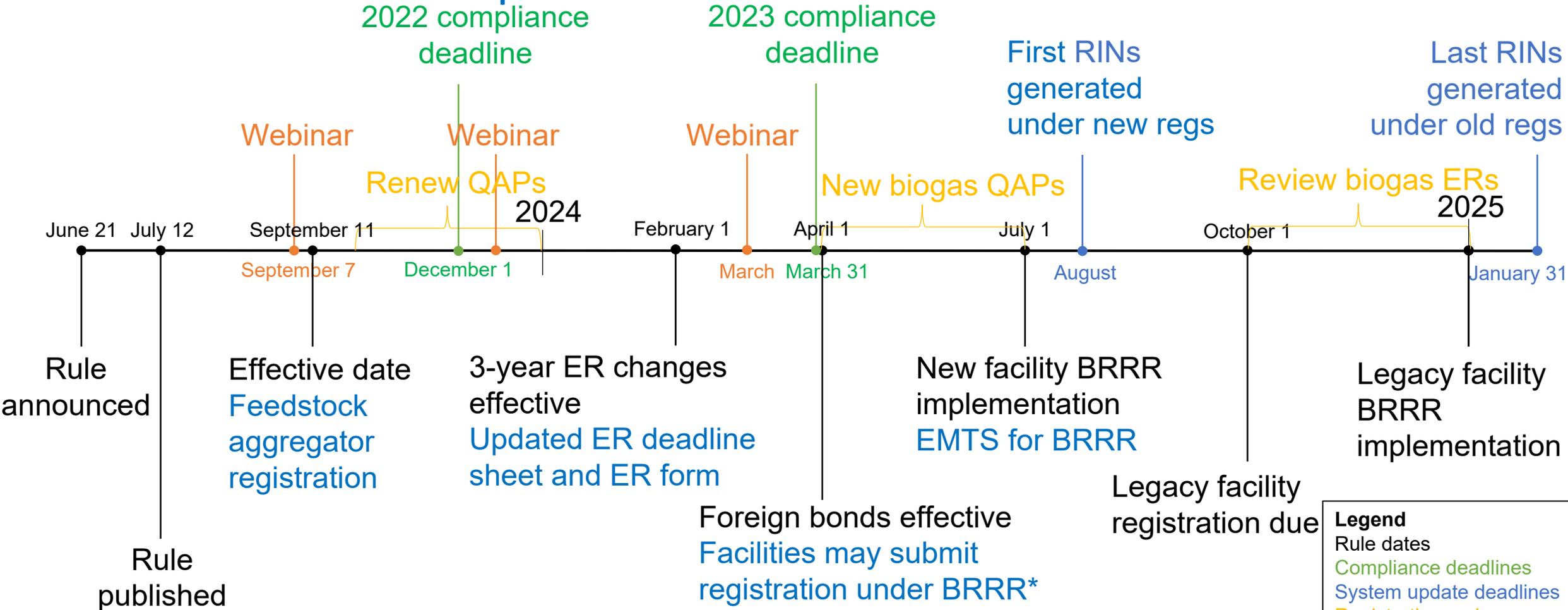


\* Not explicitly mentioned in regulations. Note that this date could be earlier if the IT system is ready prior to this date.

# Timeline for Outreach



# Timeline for Implementation



**Legend**

- Rule dates
- Compliance deadlines
- System update deadlines
- Registration review periods
- Webinars

\* Not explicitly mentioned in regulations. Note that this date could be earlier if the IT system is ready prior to this date.

# Stakeholder Outreach

- We are planning to help stakeholders comply with the regulations through two outreach events that align with the system development dates
- Possible webinar in December 2023 focused on BRRR questions
- In March 2024, discuss BRRR logistics, including:
  - Parts of a complete registration package
  - Submitting registrations for biogas producers, RNG producers, RNG RIN separators, and RNG RIN owners
  - How to generate biogas batches in EMTS



For the Q&A portion of this workshop, email generally applicable questions about implementation of the regulations to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)



# Biogas Regulatory Reform Rule (BRRR) *An Overview*

Robert Anderson

Office of Transportation and Air Quality

September 7, 2023

# What is the Biogas Regulatory Reform Rule (BRRR)?

- EPA streamlined and modernized the biogas regulatory requirements under the RFS program to improve oversight and allow for the expansion in the use of biogas
- Primary elements are moving away from records-based tracking to RIN-based tracking of biogas/RNG
  - For RNG, RINs are generated when RNG is injected into the natural gas commercial pipeline system
  - RINs must be assigned at the point of injection and may only be separated after withdrawal and demonstration that the RNG was used as CNG/LNG (i.e., transportation fuel)
  - RNG used for something other than CNG/LNG must have the associated RINs retired
- BRRR also specifies, clarifies, and details the regulatory requirements for each key regulated party in the chain
  - Codifies almost a decade's worth of guidance to provide regulatory certainty to regulated parties
  - Clearly specifies which information is required at registration, must be reported, and records must be kept
  - Disallows storage of biogas and RNG prior to registration
  - Defines what it means to continuously measure biogas and RNG while providing a performance-based mechanism to allow for alternatives

# Scope of BRRR

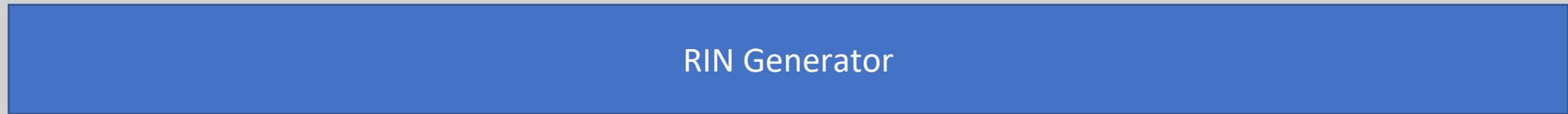
- Two main situations:
  - Biogas is upgraded and used without being mixed with natural gas (**Biogas Closed Distribution System**, BCDS or “closed system”)
  - Biogas is upgraded to renewable natural gas (RNG) and placed on a **Natural Gas Commercial Pipeline System**
- Use cases:
  - Use in vehicles as renewable CNG/LNG
  - Use of biogas/RNG as process heat to meet an EPA-approved pathway
  - Use of biogas/RNG to produce other renewable fuel
  - Export of RNG

# Parties - Biogas Closed Distribution System (BCDS)

Physical process



Pre-BRRR



Post-BRRR

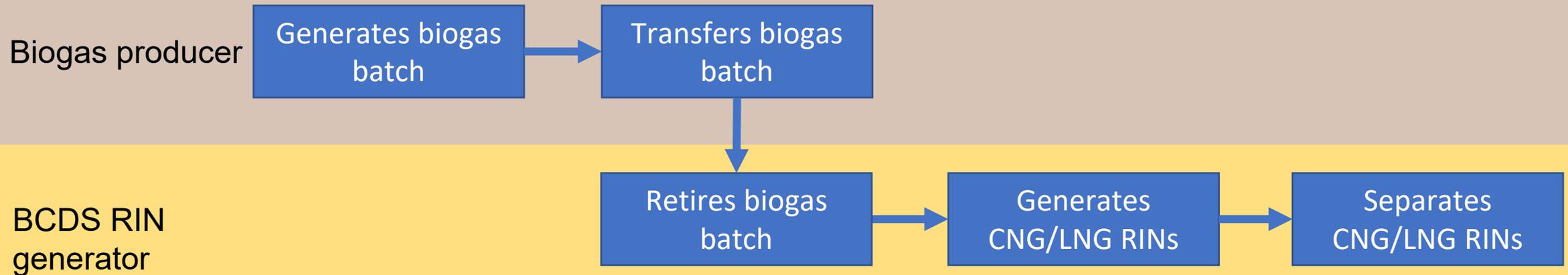


# Initial Registration Changes - BCDS

Requirement	Previous submitting party	New submitting party
Feedstock information (e.g., SFW plans)	RIN generator	Biogas producer
Engineering review	RIN generator	Biogas producer & BCDS RIN generator
Flow diagrams	RIN generator	Biogas producer & BCDS RIN generator
Dispensing locations	RIN generator	BCDS RIN generator
Contracts between parties	RIN generator	None
Measurement device information*	None	Biogas producer & BCDS RIN generator

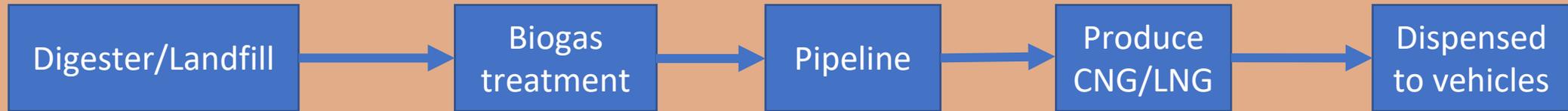
\* New requirement

# Information Flow Between Parties - BCDS

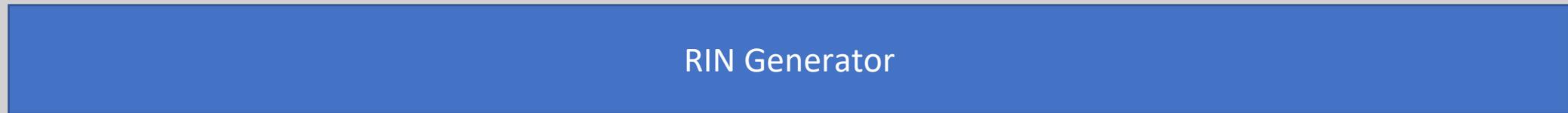


# Parties - Commercial Pipeline

Physical process



Pre-BRRR



Post-BRRR



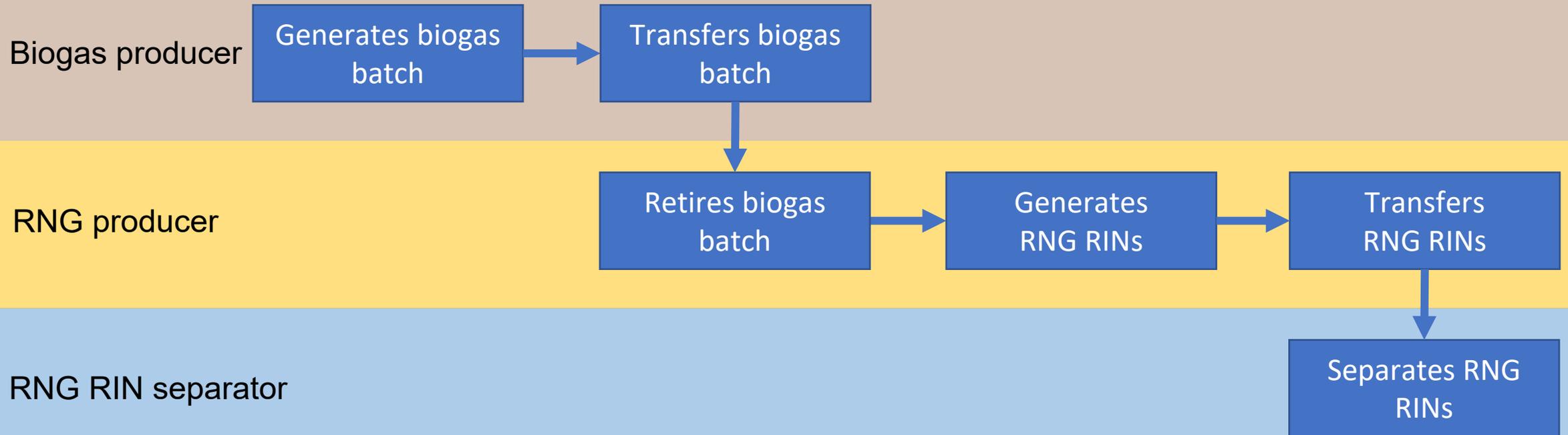
# Initial Registration Changes - Commercial Pipeline

Requirement	Previous submitting party	New submitting party
Feedstock information (e.g., SFW plans)	RIN generator	Biogas producer
Engineering review	RIN generator	Biogas producer & RNG producer
Flow diagrams	RIN generator	Biogas producer & RNG producer
Dispensing locations	RIN generator	RNG RIN separator
Contracts between parties	RIN generator	None
Gas analysis samples	RIN generator	None**
Measurement device information*	None	Biogas producers & RNG producer

\* New requirement

\*\* RNG producers must submit gas analysis samples as part of 3-year updates

# Information Flow Between Parties - Commercial Pipeline



# Other Uses Besides CNG/LNG

- Parties that use RNG as process heat or as a feedstock must:
  - Retire assigned RNG RINs
  - Report where and how much RNG was withdrawn in RFS 5400
- Parties that use biogas as a biointermediate must:
  - At registration, provide documentation showing the connection between facilities for transporting biogas
  - Keep documentation of the amount of biogas used
  - Meet the biointermediate requirements
- Parties that export RNG incur an exporter RVO

# Book and Claim Under BRRR

- As noted in the Set Rule Response to Comments (RTC), EPA did not alter its fundamental approach to the “book and claim” aspect of the biogas regulatory provisions under RFS
  - “The biogas regulatory reform does not fundamentally change the way that the biogas to renewable CNG/LNG pathway operates under the RFS program.” *Renewable Fuel Standard (RFS) Program: Standards for 2023–2025 and Other Changes: Response to Comments*, pg 225
- BRRR will now require that transfers of title (not custody) of RNG be tracked through assigned RINs in EMTS
  - This generally would not include pipelines that take custody of RNG because they do not take title of the RNG
  - We also did not include the a requirement that a party must show “capacity rights” for title transfers of RNG
  - We also did not change how we have viewed issues related to physical connectivity or direction of flow
- Physical connectivity to the natural gas commercial pipeline system will be demonstrated at registration under 40 CFR 80.135(d)(4)

# Key Dates and Next Steps

- Potential December 2023 Webinar
  - Let us know your questions, potential topics, and interest at [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)
- March 2024 Webinar
  - Focus will be on how to register and submit information in EMTS
- April 2024
  - Registration rollout
- July 1, 2024
  - Implementation date for new facilities
  - EMTS reporting for biogas/RNG rollout
- Oct 1, 2024
  - Registration submission deadline for legacy facilities
- Jan 1, 2025
  - Implementation date for all facilities



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# Mixed Digesters

Kurt Gustafson

Office of Transportation and Air Quality

September 7, 2023

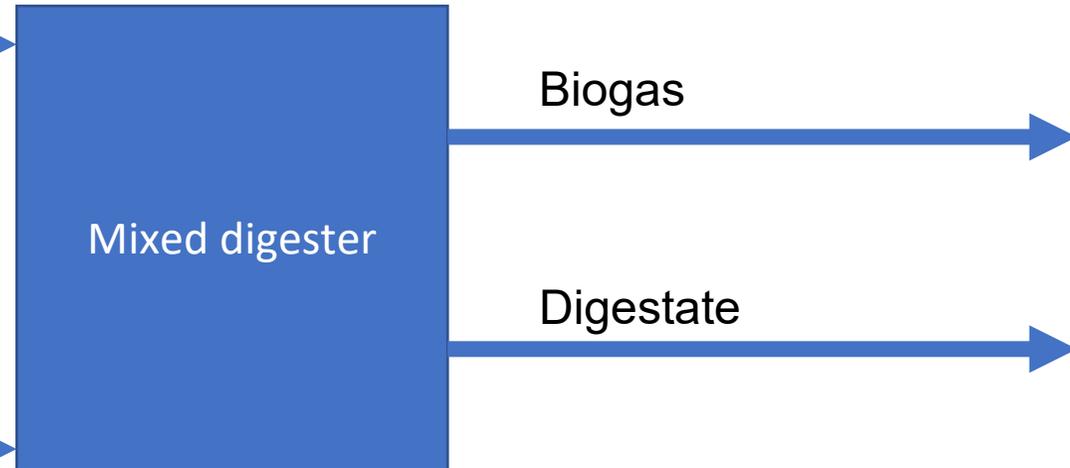
# What is a mixed digester?

Predominantly cellulosic waste feedstock(s)

Manure  
Yard waste and other woody residue  
Separated municipal solid waste  
Municipal wastewater sludge  
Some crop residues

Other waste feedstock(s)

Separated food waste  
Waste fats/oils/greases  
Some crop residues



- A mixed digester processes both predominantly cellulosic waste feedstocks and other waste feedstocks
- The mixed digester provisions apply if the digester received both feedstock types within the current month or within the previous two months
  - For example, if a digester typically receives only bovine manure but in August received food waste instead, it would be considered a mixed digester during August, September, and October

# Why did we update these provisions?

- Under the previous provisions, parties had to calculate the cellulosic converted fraction (i.e., the portion of a cellulosic feedstock that is converted into renewable fuel) based on measurements of cellulose obtained using a method that produces reasonably accurate results
- For a heterogeneous feedstock such as separated food waste, the cellulosic content can vary widely between batches, making it very difficult to determine the cellulosic content of the feedstock with any degree of accuracy
- The updated provisions sought to eliminate the need to measure cellulosic content in the feedstock and digestate, simplifying registration, reporting, recordkeeping, and auditing

# When can I use the updated provisions?

- The mixed waste digester provisions have an implementation date that aligns with the new biogas regulatory updates (i.e., July 1, 2024)
- Registration submissions for mixed waste digesters will also align with the anticipated April 2023 timeline for biogas regulatory reform registration submissions

# What are the updated provisions?

- At registration, the biogas producer specifies the converted fraction for the cellulosic feedstock, either by choosing a default value or by specifying a value based on data
- Measure the volatile solids, total solids, and total amount of cellulosic feedstock entering the digester
- Keep records for measurement of feedstocks and other additions
- Report feedstock information for biogas batch

# How do I determine the number of different RINs

1. Measure the amount of biogas produced from the digester
2. Measure the amount of cellulosic feedstock input into the digester (mass, total solids, and volatile solids)
3. Use the converted fraction specified at registration to determine the amount of biogas produced from the amount of cellulosic feedstock
$$\text{Biogas produced} = \text{cellulosic feedstock mass} \times \text{total solids} \times \text{volatile solids} \times \text{converted fraction}$$
4. Take the lesser value of steps 1 and 3 to be the amount of cellulosic D3 RINs (you are apportioning the gas production to cellulosic)
5. If step 1 is greater than step 3, the difference is D5 RINs (if more gas was produced than that apportioned to cellulosic, the excess is advanced)

# How do I determine the cellulosic converted fraction?

- You can choose a default value specified in 40 CFR 80.105 or provide data for an alternative value
  - Which option is chosen may depend on whether a facility has data for a cellulose-only baseline and whether there is an opportunity for operational data to be optimized
- Default values were obtained by taking 50% of published biomethane potential measurements
- The default values are as follows:
  - Swine manure: 1,936 Btu HHV/lb
  - Bovine manure: 2,077 Btu HHV/lb
  - Chicken manure: 3,001 Btu HHV/lb
  - Municipal wastewater treatment sludge: 3,479 Btu HHV/lb
- If a digester operates outside applicable operating ranges (specified in 40 CFR 80.105(j)(2)(v)), then the cellulosic converted fraction for that day is zero. For the default values, the operating ranges are:
  - Temperature must be above 95 degrees Fahrenheit
  - Hydraulic and solids mean residence times must be greater than 20 days

# What data are necessary for applying for a determination?

- Data that were obtained when processing of cellulosic biogas feedstock(s) in anaerobic digesters without simultaneous conversion should include:
  - Daily feedstock input amounts (including mass and volatile solids information)
  - Daily biogas production
  - Daily operating conditions
- Data must be obtained from either:
  - The facility when it was processing solely the cellulosic feedstock, or
  - A representative sample of other representative facilities processing solely same cellulosic feedstock. For the representative sample, provide an explanation of the following:
    - How the facilities for which data is provided are representative of the digester being registered
    - How the facilities were chosen
    - What other facilities were not chosen
    - How the decision on which facilities to include or exclude were made

# Specifying Acceptable Operating Ranges

- In addition to providing data, the registering companies must also use that data to specify the operating conditions that the facility must operate under in order to generate RINs. This must include:
  - A list of ranges of processing conditions, including temperature, solids mean residence time, and hydraulic mean residence time, for which the cellulosic CF is accurate and a description of how such processing conditions will be measured by the facility
  - A demonstration that no biogas generated from non-cellulosic biogas feedstocks could be used to generate RINs for a batch of renewable fuel with a D code of 3 or 7
- EPA may reject this demonstration if it is not sufficiently protective

# Other Provisions to Ensure Accurate Measurement

- Daily or composite sampling of volatile solids and total solids is required
- For composite measurement, the following information is necessary:
  - A description of when and where the samples will be collected
  - A description of how the samples will be stored prior to testing
  - A description of how daily representative samples will be mixed, including how the ratio of each sample will be determined
  - A description of how often testing will occur
  - A description of how samples are obtained, stored, and tested



For the Q&A portion of this workshop, email generally applicable questions about implementation of the regulations to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)

Take a break and  
caffeinate!

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Return at 2:15 pm EDT

Send generally applicable  
questions to  
[FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)





# Feedstock Aggregator Registration Demo

Angelina Feldman

Office of Transportation and Air Quality

September 7, 2023

# Useful Links

- Fuels Programs Registration, Reporting and Compliance Help
  - <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>
- How to Register a New Company, Facility, User
  - <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/how-register-new-company-facility-or-user-part-80>
- Job Aids for Fuels Programs Registration System (OTAQREG)
  - <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/job-aids-fuels-registration-system-otaqreg>
- EPA's Central Data Exchange (CDX) – the portal to access registration and reporting applications
  - <https://cdx.epa.gov>
- Fuels Programs Helpdesk
  - [FuelsProgramSupport@epa.gov](mailto:FuelsProgramSupport@epa.gov)

# Registering a New Company – Feedstock Aggregator

- A CDX User wishing to register a new company as a feedstock aggregator:
  - Must have a Central Data Exchange (CDX) account
  - Be able to log into the CDX OTAQREG program service

# Fuels Registration, Reporting, and Compliance Help Web Page

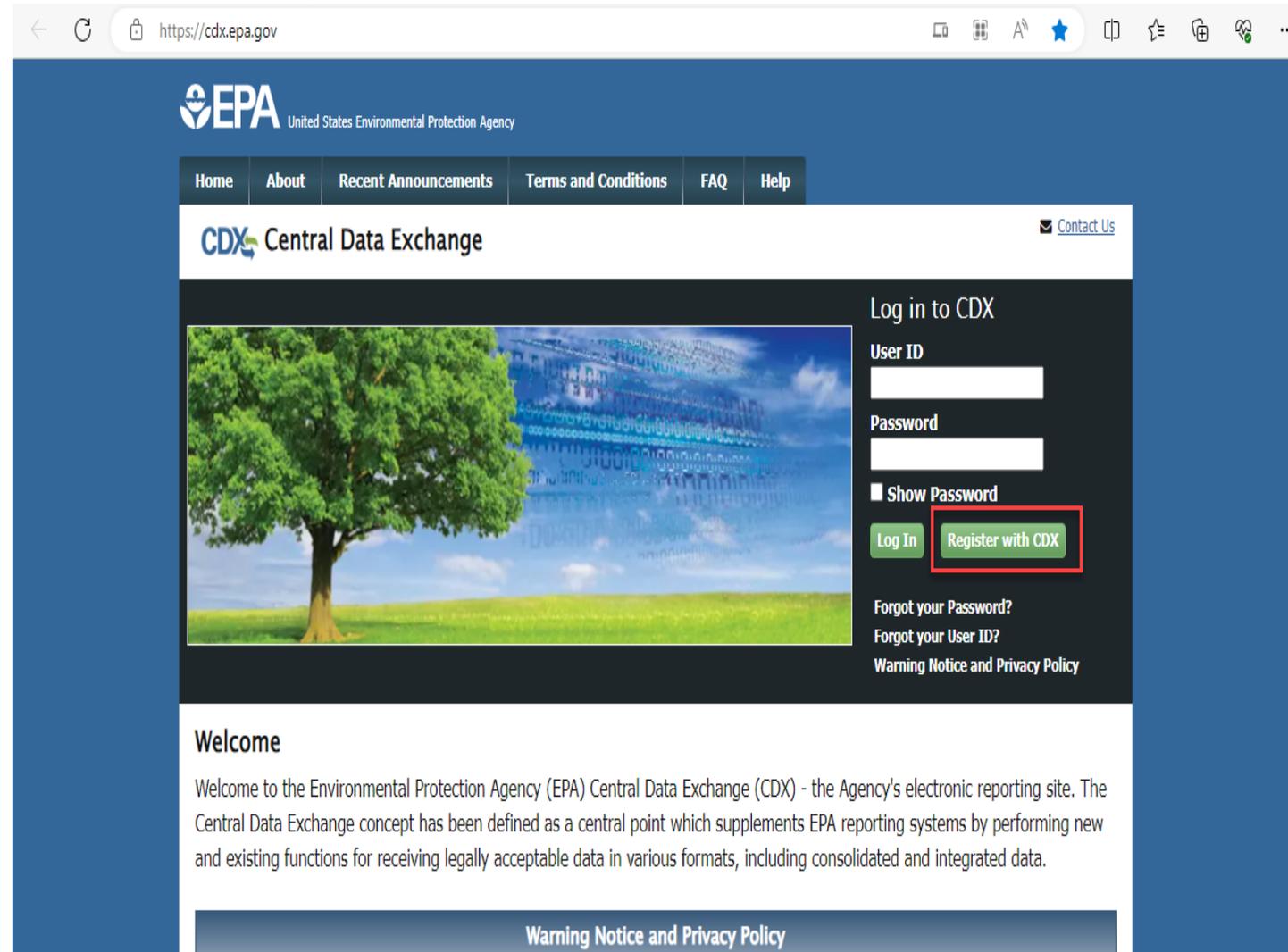
- <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>
- Registration
- Help  
[FuelsProgramSupport@epa.gov](mailto:FuelsProgramSupport@epa.gov)

The screenshot shows the EPA website header with the logo and navigation menu. The main heading is "Fuels Registration, Reporting, and Compliance Help". Below this is a large banner with a blue and black background featuring a large white checkmark. The banner text reads: "New Version of Fuels Registration System Released! The enhanced system has a more intuitive user interface and many new features. Enhanced Version of EPA's Fuels Registration System (OTAOREG) Released". Below the banner is a paragraph: "Compliance plays a vital role in ensuring fuels are manufactured to meet regulatory requirements and provide cleaner air for the public. This site provides tools to help stakeholders meet those regulatory requirements." There are four main content boxes: "Registration" (with a registration form image and link "Registration for Fuels Program"), "Reporting" (with a reporting form image and link "Reporting for Fuels Program"), "Public Data" (with a bar chart image and link "Public data and registration lists for Fuels Program"), and "Help" (with a question mark image and link "Compliance help tools for Fuels Program"). To the right is an "EnviroFlash" messaging system box with a link to "Subscribe to EnviroFlash alerts" and "View recent EnviroFlashes". At the bottom right is a "Related Topics" box with links to "Air Enforcement", "Diesel Fuel Standards", "Gasoline Standards", and "Renewable Fuel Standard Program".

# Establish a Central Data Exchange (CDX) User Account

- Step 1

- <https://cdx.epa.gov>
- Register with CDX
  
- Tutorial of CDX User Registration <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/tutorial-creating-cdx-account>



The screenshot shows the EPA Central Data Exchange (CDX) website. The browser address bar displays <https://cdx.epa.gov>. The page features the EPA logo and navigation links: Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The main heading is "CDX Central Data Exchange" with a "Contact Us" link. A large image of a tree is on the left. On the right, the "Log in to CDX" section includes input fields for "User ID" and "Password", a "Show Password" checkbox, and buttons for "Log In" and "Register with CDX". The "Register with CDX" button is highlighted with a red box. Below the login section, there is a "Welcome" message and a "Warning Notice and Privacy Policy" link.

# Establish a Central Data Exchange (CDX) User Account

- Notes on registering users:
  - Each person accessing CDX must have their own user account
  - User IDs and Passwords must never be shared
  - Users are assigned **roles** that enable (or restrict) the user's ability to perform functions or to access certain areas in EPA's registration and reporting applications
  - Each company must identify **one** user with the role Responsible Corporate Officer (RCO)
    - The RCO of the company must be an official officer (President, Vice President, CEO, etc.) or employee (with an appropriate title such as owner or operations manager) of the company registering who is legally liable for the information submitted by the company
    - The RCO may not be an agent or third party who is not directly employed by the company.
  - The RCO may delegate roles to other registered users such as "Company Editor" or "Submitter"

# Establish a Central Data Exchange (CDX) User Account

- Step 2

- Read the CDX Terms and Conditions (be sure to scroll down)
- Acknowledge you are the original registrant and owner of the User ID requested
- Click proceed

**EPA** United States Environmental Protection Agency

[Home](#) [About](#) [Recent Announcements](#) [Terms and Conditions](#) [FAQ](#) [Help](#) [Contact Us](#)

## CDX Terms and Conditions

The access and use of CDX Registration for the electronic submittal of environmental information require the creation of a user ID and password that I must maintain and keep confidential. I will review the following steps concerning the creation and maintenance of a user ID and password.

### Warning Notice

In proceeding and accessing U.S. Government information and information systems, you acknowledge that you fully understand and consent to all of the following:

1. you are accessing U.S. Government information and information systems that are provided for official U.S. Government purposes only;
2. unauthorized access to or unauthorized use of U.S. Government information or information systems is subject to criminal, civil, administrative, or other lawful action;
3. the term U.S. Government information system includes systems operated on behalf of the U.S. Government;
4. you have no reasonable expectation of privacy regarding any communications or information used, transmitted, or stored on U.S. Government information systems;

I am the original registrant and owner of the User ID requested

**WARNING:** It is a federal crime to submit identifying information for anyone other than yourself, or to use or share information with or without another user's consent. Accordingly, by checking the box, above, you attest that you are the named account holder and sole registrant to whom account information belongs.

[Cancel](#)

# Establish a Central Data Exchange (CDX) User Account

- Step 3

- Type OTAQ in the search box
- Click on “OTAQREG: Office of Transportation and Air Quality Fuels Registration”

The screenshot shows the EPA website's navigation bar with links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. Below the navigation bar is the 'CDX Core CDX Registration' section, which includes a progress indicator with four steps: 1. Program Service, 2. Role Access, 3. User and Organization, and 4. Confirmation. A search prompt asks the user to begin typing a program service name or related keywords. Below this is the 'Active Program Services List' with a search input field containing 'OTAQ' and a red arrow pointing to it. The search results list four options: OTAQDCFUEL: Office of Transportation Air Quality DC FUEL Program, OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System, OTAQREG: Office of Transportation and Air Quality Fuels Registration (highlighted with a red box), and OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application. A 'Cancel' button is located at the bottom of the list.

**EPA** United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

**CDX** Core CDX Registration [Contact Us](#)

1. Program Service 2. Role Access 3. User and Organization 4. Confirmation

Begin typing a program service name or related keywords to filter the list of available services (e.g., air quality system, AQS, or Clean Air Act).

Active Program Services List

OTAQ

OTAQDCFUEL: Office of Transportation Air Quality DC FUEL Program

OTAQEMTS: Office of Transportation and Air Quality EPA Moderated Transaction System

**OTAQREG: Office of Transportation and Air Quality Fuels Registration**

OTAQWaiverCredits: Cellulosic Biofuel Waiver Credits Pay.gov Application

Cancel

# Establish a Central Data Exchange (CDX) User Account

- Step 4
  - Complete Part 1: User Information
    - Create a User ID
    - Enter legal name for identity proofing
    - Create a Password
    - Select security questions and answers
  - Complete Part 2: Organization Information
    - Search for your organization

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Core CDX Registration [Contact Us](#)

1. Program Service ✓ 2. Role Access ✓ 3. User and Organization 4. Confirmation

**Registration Information**

Program Service	Office of Transportation and Air Quality Fuels Registration
Role	Registration

Please fill out all required fields marked with an asterisk(\*)

**Part 1: User Information**

The program you are registering for requires additional proof of identity. Later in the registration process you will be given the option to use LexisNexis, an identity proofing service. LexisNexis will pull your first, middle and last name exactly as it is entered on this page.

User ID \*

Title \*

First Name \*

Middle Initial

Last Name \*

Suffix

Password \*

Re-type Password \*

Security Question 1 \*

Security Answer 1 \*

Security Question 2 \*

Security Answer 2 \*

Security Question 3 \*

Security Answer 3 \*

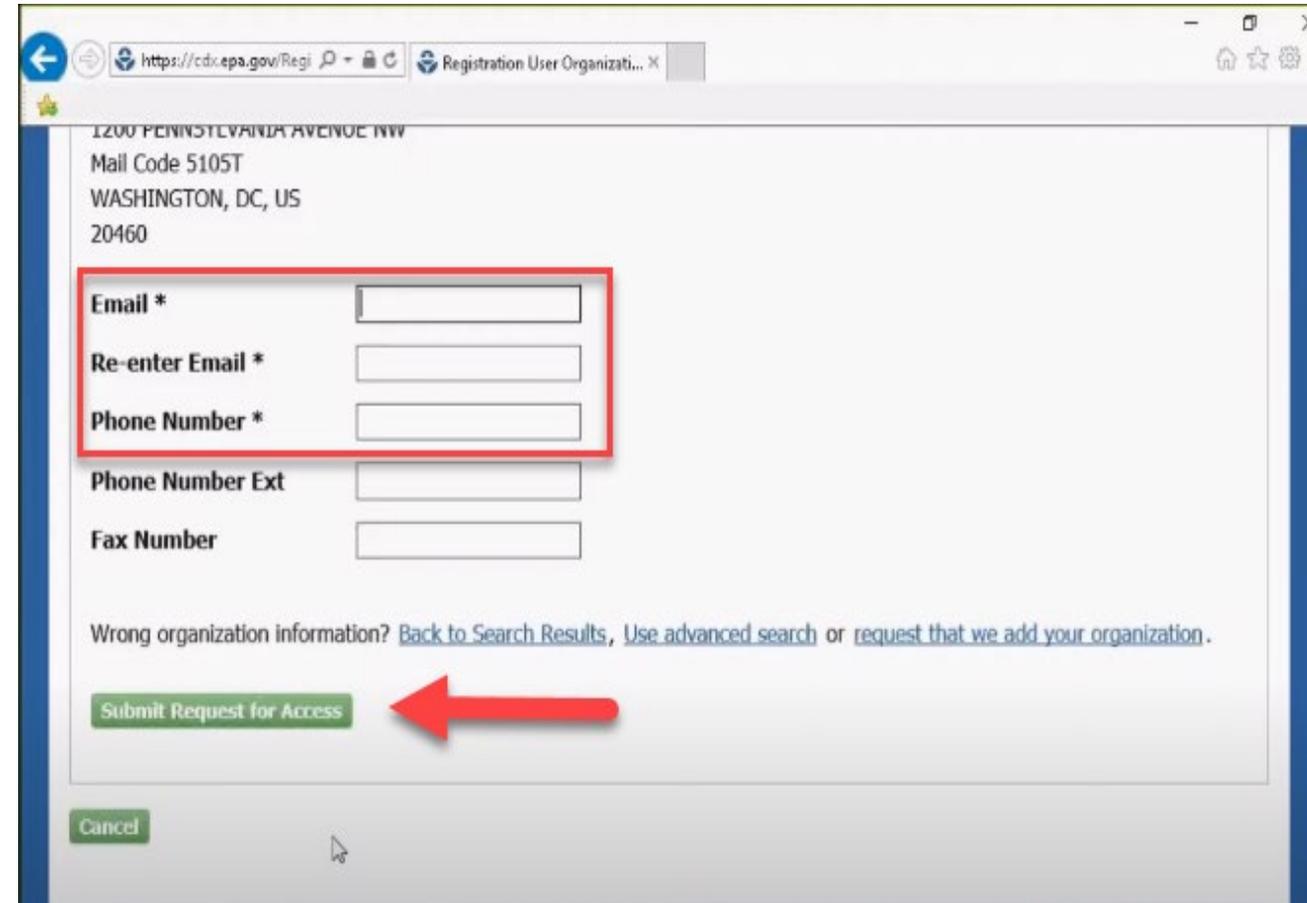
Show Passwords and Answers

**Part 2: Organization Info**

Enter organization or organization ID

# Establish a Central Data Exchange (CDX) User Account

- Step 4 (continued)
  - Complete Part 2: Organization Information
    - Upon finding your organization, enter in your contact information
    - If your organization is not found, click the link to request to add your organization
    - Email and phone number are required
    - Click on Submit Request for Access

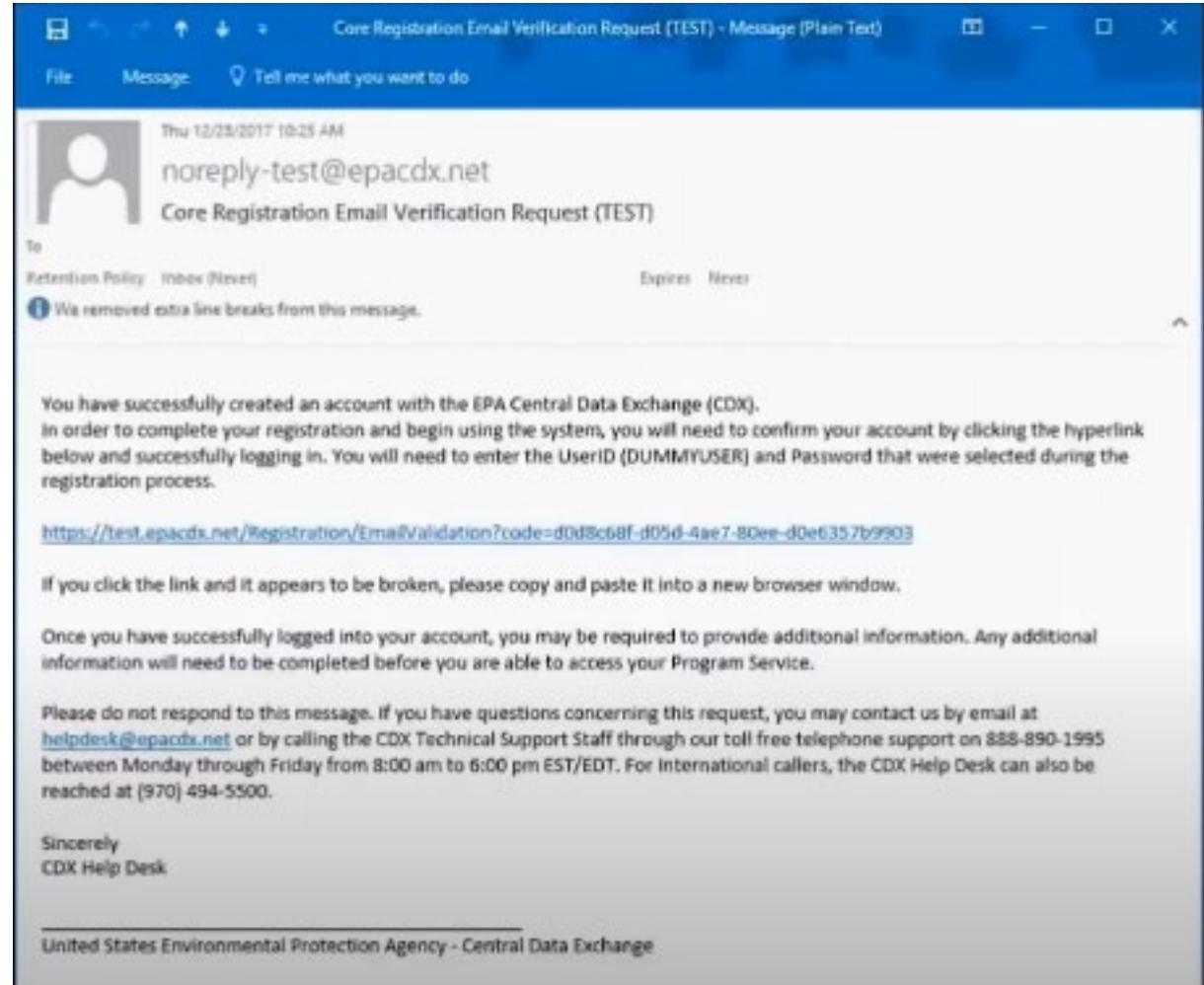


The screenshot shows a web browser window with the URL <https://cdx.epa.gov/Regi>. The page displays organization information: 1200 PENNSYLVANIA AVENUE NW, Mail Code 5105T, WASHINGTON, DC, US, 20460. Below this, there are several input fields: Email \*, Re-enter Email \*, Phone Number \*, Phone Number Ext, and Fax Number. The first three fields (Email, Re-enter Email, and Phone Number) are highlighted with a red box. At the bottom of the form, there is a green button labeled "Submit Request for Access" with a red arrow pointing to it from the right. Below the button is a "Cancel" button. A link at the bottom of the form reads: "Wrong organization information? [Back to Search Results](#), [Use advanced search](#) or [request that we add your organization](#)."

# Establish a Central Data Exchange (CDX) User Account

- Step 5

- You will receive an email to complete the verification and registration process
- Click on the provided link to continue



# Establish a Central Data Exchange (CDX) User Account

- Step 6

- The link provided in the email will take you to the CDX login page.
- Enter the User ID and Password you created

https://cdx.epa.gov

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange [Contact Us](#)

Log in to CDX

User ID

Password

Show Password

[Forgot your Password?](#)  
[Forgot your User ID?](#)  
[Warning Notice and Privacy Policy](#)

**Welcome**

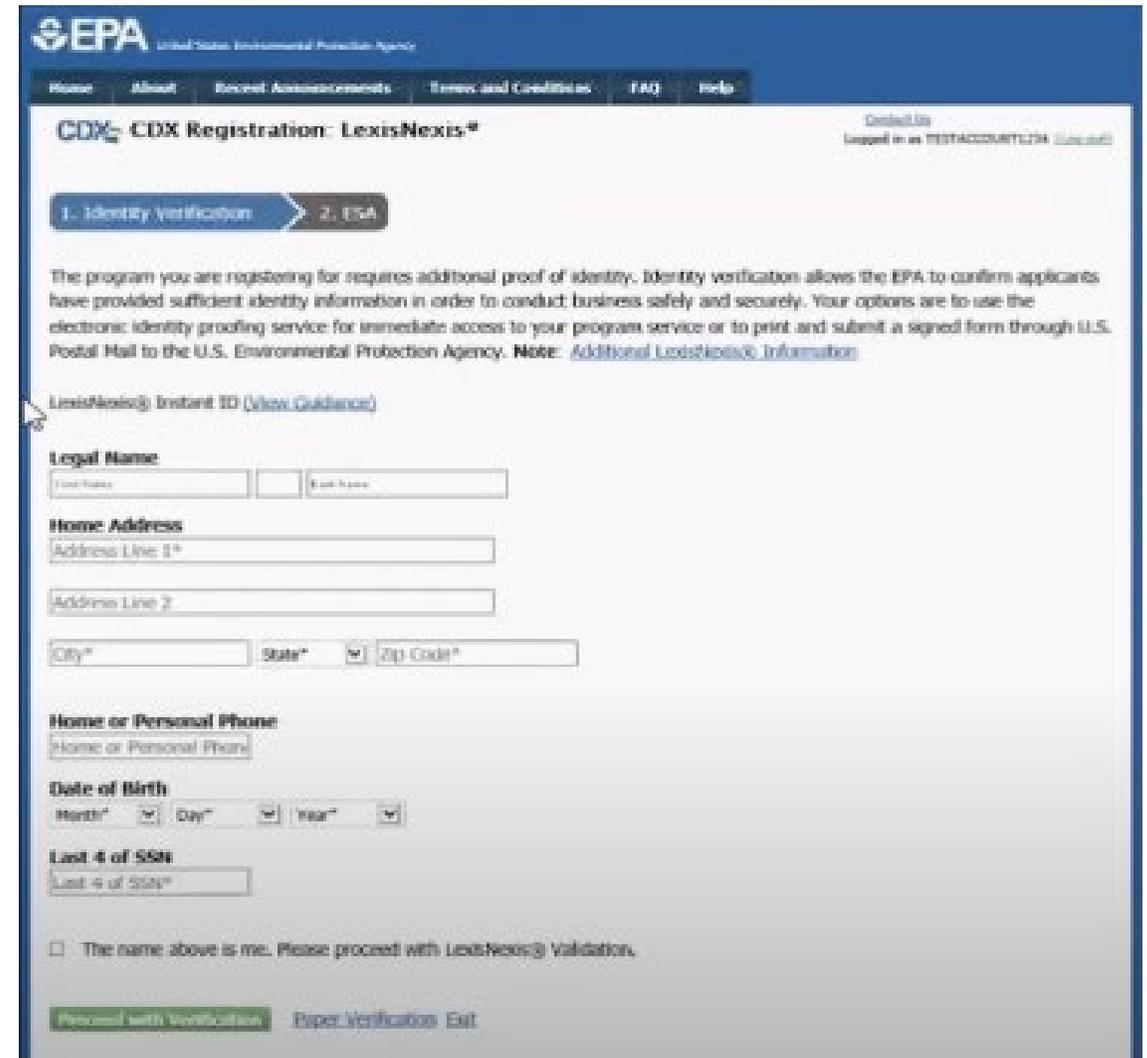
Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

[Warning Notice and Privacy Policy](#)

# Establish a Central Data Exchange (CDX) User Account

- Step 7

- Recommend you proceed with the electronic LexisNexis verification
- However, paper verification may be submitted, but may take significantly longer to process – print, complete and mail forms generated. Then wait for an email confirmation of verification.
- Click Proceed with Verification to continue with electronic verification



The screenshot shows the EPA website's CDX Registration interface for LexisNexis. The page title is "CDX Registration: LexisNexis®" and it indicates the user is logged in as "TESTACCOUNT1234". The registration process is in two steps: "1. Identity verification" (active) and "2. USA". A paragraph explains that the program requires additional proof of identity and offers two options: electronic identity proofing or paper verification via U.S. Postal Mail. Below this, there is a link for "LexisNexis® Instant ID (Show Guidance)". The form fields include: "Legal Name" (Last Name and First Name), "Home Address" (Address Line 1, Address Line 2, City, State, and Zip Code), "Home or Personal Phone", "Date of Birth" (Month, Day, and Year), and "Last 4 of SSN". At the bottom, there is a checkbox for "The name above is me. Please proceed with LexisNexis® Validation." and two buttons: "Proceed with Verification" and "Paper Verification Exit".

# Establish a Central Data Exchange (CDX) User Account

- Step 8

- Next select and create five signature questions and answers
- Signature questions and answers are used when creating/updating company or facility registrations using the e-signature widget
- Click Save Answers to proceed

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange

Contact Us  
Logged in as TESTUSER1238 (Logout)

### CDX Registration: Additional Verification

1. Identity Verification ✓ 2. Signature Question 3. ESA

You are registered for a program that requires signature question verification. Please select five (5) signature questions and answers. The questions that you select should be questions that you can remember, but difficult for anyone else to guess.

Select 5 Signature Questions and Answers

What is the first and middle name of your oldest sibling?	▼	Firstname Middlename
What is your favorite pet's name?	▼	Name
Where did you graduate from high school?	▼	High School
What was your first pet's name?	▼	Pet Name
What street was your high school located on?	▼	Street

Save Answers

# Establish a Central Data Exchange (CDX) User Account

- Step 9

- Continue through the summary and review screen, selecting the option to Sign Electronically
- A pop-up with additional certifications will appear, click on Accept to continue
- Finally, the e-signature widget will open prompting you to –
  - Enter your password
  - Answer a signature question, and
  - Sign

The screenshot shows an 'eSignature Widget' with three main sections:

- 1. Authentication:** 'Log into CDX'. Fields for 'User:' (TESTUSER1228) and 'Password:' (masked with dots) are shown. A red arrow points to the password field. A 'Welcome' message is visible below the password field.
- 2. Verification:** 'Question: Where did you graduate from high school?'. The 'Answer:' field contains 'high school'. A red arrow points to the answer field. A 'Correct Answer' message is visible below the answer field.
- 3. Sign File:** A green 'Sign' button is shown with a red arrow pointing to it.

# Establish a Central Data Exchange (CDX) User Account

- Step 10

- Following completion of electronic or paper verification you will be returned to the MyCDX homepage.
- Click on the hyperlink under Role for the final User Registration step.
- Note if paper verification is selected, the hyperlink will not be active until verification has been processed by EPA

The screenshot displays the EPA MyCDX Central Data Exchange user interface. At the top, the EPA logo and navigation links (Home, About, Recent Announcements, Terms and Conditions, FAQ, Help) are visible. The user is logged in as TESTUSER1228. The main content area features a 'Services' table with columns for Status, Program Service Name, and Role. The 'Role' column for the 'OTAQREG: Office of Transportation and Air Quality Fuels Registration' entry is circled in red, highlighting the 'Fuels Programs Registration' link. To the right, there are sections for 'CDX Service Availability' and 'News and Updates'. At the bottom, there are buttons for 'Add Program Service' and 'Manage Your Program Services'.

Status	Program Service Name	Role
	OTAQREG: Office of Transportation and Air Quality Fuels Registration	<a href="#">Fuels Programs Registration</a>

# Establish a Central Data Exchange (CDX) User Account

- Step 11
  - Enter your Position or Job Title
  - Click Save to complete User registration
  - Next – Register your Company

The screenshot displays the EPA MyCDX 'Edit User Profile' page. The page header includes the EPA logo and 'United States Environmental Protection Agency'. The user is logged in as 'TESTUSER1228'. The page title is 'OTAQ Registration' and the sub-header is 'Edit User Profile'. A note states: 'Note: Certain fields below are maintained in CDX. Go to the Edit Current Account Profiles page in MyCDX to make changes to fields that are not editable here.'

**User Information**

Prefix: Mr  
First Name:  
Middle Initial:  
Last Name:  
Suffix:  
CDX ESA Status: Received

\* Position or Job Title:

Valid From (MM/DD /YYYY): 12/28/2017  
Valid To (MM/DD /YYYY):  Optional

**Address and Contact Information**

Address 1: 1201 CONSTITUTION AVE  
Address 2: 7404M  
City: WASHINGTON  
State: District of Columbia  
ZIP: 20460  
Country: United States

E-mail:  
Alternate E-mail:   
Phone:  
Alternate Phone:  x   
Fax:

Save

# Establish a Central Data Exchange (CDX) User Account

**Complete**

# Registering a New Company – Feedstock Aggregator

The screenshot shows the EPA Central Data Exchange (CDX) website. The browser address bar displays <https://cdx.epa.gov>. The EPA logo and "United States Environmental Protection Agency" are at the top left. A navigation menu includes "Home", "About", "Recent Announcements", "Terms and Conditions", "FAQ", and "Help". The CDX logo and "Central Data Exchange" are prominently displayed. A "Contact Us" link is in the top right. The main content area features a large image of a tree and a field. To the right of the image is a "Log in to CDX" section with input fields for "User ID" and "Password", a "Show Password" checkbox, and "Log In" and "Register with CDX" buttons. Below the image, there is a "Welcome" section with a paragraph of text. At the bottom, a "Warning Notice and Privacy Policy" link is visible.

https://cdx.epa.gov

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange Contact Us

Log in to CDX

User ID

Password

Show Password

Log In Register with CDX

Forgot your Password?  
Forgot your User ID?  
Warning Notice and Privacy Policy

Warning Notice and Privacy Policy

**Welcome**

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

# Registering a New Company – Feedstock Aggregator

The screenshot displays the EPA CDX Central Data Exchange interface. At the top, the EPA logo and navigation links (Home, About, Recent Announcements, Terms and Conditions, FAQ, Help) are visible. The user is logged in as TESTUSER1228. The main content area features a 'Services' table with columns for Status, Program Service Name, and Role. The 'Fuels Programs Registration' link in the Role column is circled in red. Below the table are buttons for 'Add Program Service' and 'Manage Your Program Services'. To the right, there are sections for 'CDX Service Availability' and 'News and Updates'.

Status	Program Service Name	Role
	OTAQREG: Office of Transportation and Air Quality Fuels Registraton	<a href="#">Fuels Programs Registration</a>

# Registering a New Company – Feedstock Aggregator

 OTAQ Registration [Home](#) **Create New Company** [Associate To Existing Company](#) Welcome to OTAQReg.

[Home](#) / Basic Company Information

What To Do

Please enter your company information below and hit Continue. Information provided will be compared against existing registered companies to prevent duplicates.

**Company Name and Location**

**Company Name:**

**Street Address:**

**Street Address (Line 2):**

**City:**  **State/Province:**

**Postal Code:**  **Country:**

# Registering a New Company – Feedstock Aggregator

 [OTAQ Registration](#) [Home](#) [Create New Company](#) [Associate To Existing Company](#) Welcome to OTAQReg.

[Home](#) / [Company Information](#)

### Company Name and Location

Note: Address must be a street address and not a PO box. If you are entering an international address that has no postal code, enter "00000" for Postal Code.

**Company Name \***  
Renewable Fuel - Feedstock Aggregator

**Street Address: \***  
123 Main St

**Street Address (Line 2):**

**City: \*** Fairfax **State/Province: \*** Virginia

**Postal Code: \*** 22030 **Country: \*** UNITED STATES

### Responsible Corporate Officer (RCO) Information

The responsible corporate officer (RCO) of the company must be an official officer (President, Vice President, CEO, etc.) or employee (with an appropriate title) of the company registering who is legally liable for the information submitted for the company. The RCO may not be an agent or third party who is not directly employed by the company.

**Are you the Responsible Corporate Officer for this company? \***  Yes  No

**RCO CDX User ID: ⓘ** TestUserID **RCO Name:** Jane Smith

**RCO Title: \*** CEO **RCO Phone:** (123) 456-7890

**RCO Email:** Jane.Smith@company.com **RCO Fax:**

[Back](#) [Save](#) [Save & Continue](#)

# Registering a New Company – Feedstock Aggregator

Program Type and Business Activities

Are you required to submit Engineering Reviews (ER) via ER Webform and/or documents via DCFuels in order to register your company activities? If you have already had your company activated, select No and select the appropriate company type below.  Yes  No

Are you an independent third party that will conduct audits of renewable fuel production under the Quality Assurance Plan (QAP) Program?  Yes  No

Are you an independent third party that conducts surveys on behalf of other companies under 40 CFR Part 1090?  Yes  No

Are you an independent third party that conducts attest audits on behalf of other companies under 40 CFR Part 1090?  Yes  No

Do you produce or import Gasoline, Reformulated Gasoline, Pentane, Ethanol Denaturant, or Oxygenates; or do you blend Oxygenates?  Yes  No

Do you produce or import Diesel fuel that is used to power highway vehicles and/or non-road engines and equipment?  Yes  No

Do you produce, import, export, provide feedstocks for, or otherwise handle Renewable Fuel or Biointermediate Products as defined under the Renewable Fuel Standard Program?  Yes  No

Business Activities For *Renewable Fuel Standard* Program Type

Please choose at least one activity

Biointermediate Producer  No

Feedstock Aggregator  Yes

Foreign Undenatured Ethanol Producer  No

PADD Importer (Renewable Fuel Importer)  No

# Registering a New Company – Feedstock Aggregator

Attest Submission Information

Is this company required to submit one or more annual attest audit reports? \*  Yes  No

[◀ Back](#) [Save](#) [Save & Continue ▶](#)

# Registering a New Company – Feedstock Aggregator

40 CFR Part 79 Company Information

What To Do

Each motor-vehicle gasoline, motor-vehicle diesel fuel, and fuel additive for either or both, is required to be registered under 40 CFR Part 79 and assigned a nine-digit product identifier.

In an effort to end the use of paper forms 3520-12 and 3520-13 under 40 CFR Part 79, EPA is transitioning all fuel and fuel additive registrations to this online system.

For fuel and fuel additive products that were assigned a nine-digit product ID prior to August 2020, the company that manufactures or imports the product must manage that product through a company that is registered in this online system.

Is this company required to submit fuel and/or fuel additive information to comply with 40 CFR Part 79? \*  Yes  No

[◀ Back](#) [Save](#) [Save & Continue ▶](#)

# Registering a New Company – Feedstock Aggregator

Additional Company/User Role Associations

Are you the Delegated Responsible Corporate Officer for this company?  No

Are you indirectly employed by this company as an agent?  No

Will you be submitting compliance reports and other information on behalf of this company? If you have questions about what these reports entail, please see the [OTAQ help page](#).  No

# Registering a New Company – Feedstock Aggregator

### Facility Registrations

Show  entries Filter Facilities

**Add Facility**

ID	Name	Type	Status	Location	Actions
There are no Facilities to display.					

Showing 0 to 0 of 0 entries Previous Next

[◀ Back](#) [Save](#) [Save and Review ▶](#)

**Warning** ✕

A list of company activities registered to your company that do not have a matching facility activity is outlined below. You must have at least one facility activity that maps to each company activity associated to your company. Please remove each company activity from your company's registration or add one of the corresponding facility activities to at least one of your facilities.

- Feedstock Aggregator
  - Feedstock Aggregator

[Close](#)

# Registering a New Company – Feedstock Aggregator

The image displays three sequential screenshots of the 'Add Facility' web application interface, illustrating the process of registering a new company.

**First Screenshot: Add Facility Form**  
This screen shows the 'Add Facility' form with the following fields and values:

- Facility ID: (empty)
- Facility Name: (empty)
- Facility Country: UNITED STATES OF AMERICA
- Facility Address: 7145 Old Mt Holly
- City: Charlotte
- State: North Carolina
- County: -Select a County-
- ZIP Code: 28214

The 'Search Facilities' button is highlighted with a red box.

**Second Screenshot: Facility Search Results**  
This screen shows the search results for the criteria: UNITED STATES OF AMERICA | 7145 OLD MT HOLLY, CHARLOTTE, NC 28214. A table lists the search results:

EPA Registry ID	Facility Name	Facility Address	EPA Programs Reporting	Alternate EPA Registry IDs/Program IDs
999983156478	MAGELLAN CHARLOTTE #1	7145 OLD MT HOLLY ROAD CHARLOTTE, NC 28214	OTAQREG	OTAQREG10031288

The radio button next to the first result is selected and highlighted with a red box. Below the table, the 'Proceed with Selection' button is also highlighted with a red box.

**Third Screenshot: Selected Facility**  
This screen shows the details of the selected facility, 'MAGELLAN CHARLOTTE #1'. The 'Save Selected Facility' button is highlighted with a red box.

# Registering a New Company – Feedstock Aggregator

Add Facility ×

**Add Facility**

Facility Search Results (0 facilities found) List View | [Map View](#)

**Search Criteria:** 21212 | ARLINGTON COUNTY Change

**No Facilities Found**  
Your search criteria did not match any facility records. You may return to the 'Find Existing facility' form, and refine your search, by clicking the 'Change' button. If the facility doesn't exist, you may create a facility by clicking the 'Can't find your facility? Click here to create it' link.

Proceed with Selection [Can't find your facility? Click here to create it](#)

# Registering a New Company – Feedstock Aggregator

Add Facility ×

**Add Facility**

**Create Facility**  
[< Back to Search Results](#)

**Facility Name**  
ABC Biodiesel

**Facility Address**  
UNITED STATES OF AMERICA  
111 ABC Biodiesel St  
Address 2  
Arlington VA 21212  
ARLINGTON COUNTY

**Coordinates**  
Latitude  
Longitude

**Is Mailing Address Same as Facility Address?**  
 Yes  No

**Map Facility**

**Submit**



**Map Legend**

# Registering a New Company – Feedstock Aggregator

Add Facility ×

**Add Facility** | **Unsaved Facility**

**Selected Facility** (1 unsaved facility) List View | [Map View](#)  
[< Add Another Facility](#)

Clicking the 'Save Selected Facility' button saves the facility you have selected in the current session so it is available to you the next time you log in. You may view a facility's details by clicking the 'View/Edit Details' link on the table view or the 'Details' button on the map view. You may also remove a facility by clicking the 'Remove' link or button for that facility. Please note that a facility with insufficient location information may not appear on the map view.

Filter:  Export Options

EPA Registry ID	Program ID	Facility Name	Facility Address	
Pending	Pending	ABC BIODIESEL	111 ABC BIODIESEL ST ARLINGTON, VA 21212 ARLINGTON COUNTY	<a href="#">View/Edit Details</a> <a href="#">Remove</a>

Showing 1 to 1 of 1 facilities Previous 1 Next

**Save Selected Facility**

# Registering a New Company – Feedstock Aggregator

### Facility Name and Location

Note: Address 1 may not be a PO Box. If you are entering an international address that has no postal code, enter "00000".

**Facility Name:**  
ABC BIODIESEL

**Street Address:**  
111 ABC BIODIESEL ST

**Street Address (Line 2):**

**City:** ARLINGTON      **State:** VA

**Postal Code:** 21212      **Country:** UNITED STATES

### Facility Contact Information

Please provide the Contact Name, Title, Email and Phone number as described in 80.76

**Name: \***  
John Smith

**Title: \*** Manager      **Phone: \*** 2026661666

**Email: \*** jsmith@abcbiodiesel.com      **Fax:**

◀ Back   Save   Save & Continue ▶

# Registering a New Company – Feedstock Aggregator

Facility Program Types and Activities

Does this facility contain separated yard waste, separated food waste, separated MSW, or biogenic waste oils/fats/greases that are supplied to producers of renewable fuels or biointermediates? \*  Yes  No

Business Activities For *Feedstock Aggregator* Program Type

Feedstock Aggregator ⓘ  Yes

◀ Back  Save & Continue ▶

Facility Record Storage

Are facility records stored on-site, off-site, or both as defined in 80.76?

On-Site?  Yes

Off-Site?  No

◀ Back  Save & Continue ▶

# Registering a New Company – Feedstock Aggregator

**EPA** OTAQ Registration Home Create New Company Associate To Existing Company Welcome to OTAQReg.

Home / Company Information / Program Types and Activities / 40 CFR Part 79 Company Information / Company/User Role Associations / Facility Registrations

Facility Registrations

Show 10 entries Filter Facilities

**Add Facility**

ID	Name	Type	Status	Location	Actions
OTAQREG10031288	MAGELLAN CHARLOTTE #1	• Feedstock Aggregator	New	7145 OLD MT HOLLY ROAD CHARLOTTE, NC 28214	<a href="#">View</a> <a href="#">Edit</a> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous 1 Next

[Back](#) [Save](#) **Save and Review**

# Registering a New Company – Feedstock Aggregator

**Request Information**

Request ID: COM-26765	Created On: 07/24/2023
Request Type: New Company	Modified On: 07/24/2023
Request Status: Draft	Requestor ID:
Company Name: Renewable Fuel - Feedstock Aggregator [1843]	Requestor Name:
Submission: Initial	

**Requested Company Program Types and Business Activities**

[Edit Company Programs and Business Activities](#)

**Program Types and Business Activities**

Renewable Fuel Standard  
Feedstock Aggregator

**Requested Facilities**

[Add/Edit Facilities](#)

Show  entries Filter Facilities

ID	Name	Type	Status	Location
OTAQREG10045104	EPA TEST FACILITY	Feedstock Aggregator	New	123 MAINE AVE SW WASHINGTON, DC 20024

**Facility Reporting Information**

Reporting ID:	Program Type: Feedstock Aggregator	Business Activity: Feedstock Aggregator
---------------	------------------------------------	---

**Facility Contact Information**

Contact Name: Janet Smith	Contact Phone: 800-456-1000
Contact Title: Manager	Contact Fax:
Contact Email: J.Smith@company.com	

**Facility Types and Activities**

Feedstock Aggregator
Feedstock Aggregator

[Home Page](#) [Back](#) [Cancel Request](#) [Sign and Submit](#)

[Home Page](#) [Back](#) [Cancel Request](#) [Submit and Notify RCO](#)

# Registering a New Company – Feedstock Aggregator

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

**Accept** Decline

eSignature Widget

### 1. Authentication

Log into CDX

**User:**  
DEMOUSER

**Password:**  
••••••••••

Show Password

### 2. Verification

**Question:**  
What is your favorite movie?

**Answer:**

Show Answer

Correct Answer

### 3. Sign File

Sign

My Requests

Pending Withdrawn Rejected

Show 10 entries Search: 1865

Request ID	Request Type	Request Subject	Submitted By	Date Last Updated	Status
COM-26836	New Company	Renewable Fuel - Feedstock Aggregator - 1865	RCO Aggregator	07/31/2023	Awaiting Initial Review

Showing 1 to 1 of 1 entries (filtered from 24 total entries)

Previous 1 Next

# Registering a New Company – Feedstock Aggregator

**Complete**

# Existing Renewable Fuel and Biointermediate Producers - Associating with Feedstock Aggregators

- Existing Renewable Fuel Producers and Biointermediate Producers:
  - Must have a Central Data Exchange (CDX) account
  - Be able to log into the CDX OTAQREG program service
  - Must have the Company Editor role in OTAQREG on behalf of the company for which you intend to perform this task
  - Company must be registered as a Renewable Fuel Producer or Biointermediate Producer with at least one facility and Renewable Fuel Standard (RFS) pathway in OTAQREG

# Existing Producers - Associating With a Feedstock Aggregator

The screenshot shows the EPA Central Data Exchange (CDX) website. At the top, the EPA logo and "United States Environmental Protection Agency" are visible. Below this is a navigation menu with links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The main header features the CDX logo and "Central Data Exchange" text, along with a "Contact Us" link. The central focus is the "Log in to CDX" section, which includes a large image of a tree in a field. To the right of the image are input fields for "User ID" and "Password", a "Show Password" checkbox, and "Log In" and "Register with CDX" buttons. Below the login fields are links for "Forgot your Password?", "Forgot your User ID?", and "Warning Notice and Privacy Policy". At the bottom of the page, there is a "Welcome" section with a paragraph of text and a "Warning Notice and Privacy Policy" link.

https://cdx.epa.gov

EPA United States Environmental Protection Agency

Home About Recent Announcements Terms and Conditions FAQ Help

CDX Central Data Exchange Contact Us

Log in to CDX

User ID

Password

Show Password

Log In Register with CDX

Forgot your Password?  
Forgot your User ID?  
Warning Notice and Privacy Policy

**Welcome**

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

Warning Notice and Privacy Policy

# Existing Producers - Associating With a Feedstock Aggregator

The screenshot displays the EPA CDX Central Data Exchange interface. At the top left is the EPA logo and the text "United States Environmental Protection Agency". A navigation bar contains links for Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. Below this is the CDX logo and the text "Central Data Exchange". On the right, there is a "Contact Us" link and a login status: "Logged in as TESTUSER1228 (Log out)".

Below the header are several tabs: MyCDX, Inbox, My Profile, Submission History, and E-Enterprise Portal. The main content area is divided into two columns. The left column is titled "Services" and contains a table with the following data:

Status	Program Service Name	Role
	OTAQREG: Office of Transportation and Air Quality Fuels Registraton	Fuels Programs Registration

The "Role" cell in the table is circled in red. To the right of the table is a "CDX Service Availability" section with a link: "See the status for all program services". Below that is a "News and Updates" section with the text "No news/updates.". At the bottom of the main content area are two buttons: "Add Program Service" and "Manage Your Program Services".

# Existing Producers - Associating With a Feedstock Aggregator

The screenshot shows a web interface titled "My Companies". At the top left, there is a "Show 10 entries" dropdown. At the top right, there is a "Filter Companies: 1601" input field. Below this is a table with the following columns: "Company ID", "Company Name", "Address", and "My Roles". The table contains one entry with the following details:

Company ID	Company Name	Address	My Roles
1601	Renewable Fuel Producer - Test	123 Main St, Fairfax, VA 22030, US	<ul style="list-style-type: none"><li>EMTS RFS Viewer</li><li>EMTS RFS Submitter</li><li>Company Editor</li></ul>

A dropdown menu is open for the "Company ID" cell, listing several actions: "View Company Information", "Edit Roles", "Edit Company Information", "Edit Program Types and Activities", "Manage Facilities", "QAP Associations", "Manage Attest Auditor Associations", and "RCO Update Request". The "Manage Facilities" option is highlighted with a red box.

At the bottom right of the table, there are "Previous", "1", and "Next" navigation buttons.

# Existing Producers - Associating With a Feedstock Aggregator

Facility Management

Show  entries Add Facility

Filter Facilities

ID	Name	Type	Status	Location	Actions
OTAQREG10024928	EAST TEXAS RENEWABLES, LLC	<ul style="list-style-type: none"><li>Gas/Ethanol</li><li>Diesel/Biodiesel</li></ul>	Active	12942 FM2767 TYLER, TX 75708	<a href="#">View</a> <a href="#">View Reporting IDs</a> <b><a href="#">Edit</a></b> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous **1** Next

[Back](#) [Save](#) [Save and Review](#)

# Existing Producers - Associating With a Feedstock Aggregator

Facility Name and Location

Facility Contact Information

Facility Program Types and Activities

Facility Record Storage

Renewable Facility Information

The activities previously selected require that you register a Renewable Facility. Please provide the information requested below, and subsequent pages.

Renewable Facility - GHG Threshold Information

Is this facility subject to the 20% GHG Threshold as referenced in 80.1403?

Back Save Save & Continue

# Existing Producers - Associating With a Feedstock Aggregator

Facility Pathways

[Add RFS Pathway](#)

Show  entries Filter pathways

Fuel Code	Process Description Code	Feedstock Codes	Fuel Type Code	Co-Product Codes	FFARS ID	Capacity Type	Capacity (gallons)	Pathway Feedstock(s) Supplied By Feedstock Aggregator?	Actions
Non-ester Renewable Diesel (EV 1.7) (40)	Grandfathered (Other) (888)	<ul style="list-style-type: none"> <li>Biogenic Waste Oils/Fats/Greases (160) - N/A <a href="#">Less</a></li> </ul>	Renewable Fuel (D6)			Permitted Capacity	288,000,000	No	<a href="#">Edit</a> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous **1** Next

# Existing Producers - Associating With a Feedstock Aggregator

Pathway Information ✕

**Fuel Code: \***  
Non-cellulosic Ethanol (10) ✕ ▾

**Process Code: \***  
Cellulosic Production Process (280) ✕ ▾

**Feedstock Codes: \***  
✕ Cellulosic Biomass -- Separated Municipal Solid Waste (220)

**Fuel Type Code: \***  
Advanced Biofuel (D5) ✕ ▾

**Co-Product Codes:**  
Select a CoProduct Code..

**Are any of the above feedstocks supplied by a Feedstock Aggregator? \***  
 Yes  No

**Feedstock Aggregator Supplied Feedstock Codes: \***  
✕ Cellulosic Biomass -- Separated Municipal Solid Waste (220) ✕

**Permitted Capacity (gallons):**  
10,000

**Actual Peak Capacity (gallons):**

**Nameplate Capacity (gallons):**

**Biogas/Electricity - Contracted Volume (gallons):**

[Add FFARS Product](#)

[Cancel](#) [Save](#)

# Existing Producers - Associating With a Feedstock Aggregator

Facility Pathways

Show  entries Add RFS Pathway

Filter pathways

Fuel Code	Process Description Code	Feedstock Codes	Fuel Type Code	Co-Product Codes	FFARS ID	Capacity Type	Capacity (gallons)	Pathway Feedstock(s) Supplied By Feedstock Aggregator?	Actions
Non-ester Renewable Diesel (EV 1.7) (40)	Grandfathered (Other) (888)	• Biogenic Waste Oils/Fats/Greases (160) - N/A <a href="#">Less</a>	Renewable Fuel (D6)			Permitted Capacity	288,000,000	Yes	<a href="#">Edit</a> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous **1** Next

⏪ Back
⬇ Save
Save & Continue ⏩

# Existing Producers - Associating With a Feedstock Aggregator

Feedstocks Supplied by Feedstock Aggregator

Show  entries

Filter Feedstock Aggregator Supplied Feedstocks

**Add Feedstock Aggregator**

Fuel Code	Process Description Code	Feedstock Code	Fuel Type Code	Feedstock Aggregator Company (ID)	Feedstock Aggregator Facility (ID)	Start Year	End Year	Active	Actions
There are no Feedstock Aggregator Supplied Feedstocks to display.									

Showing 0 to 0 of 0 entries

Previous Next

[◀ Back](#) [Save](#) [Save & Continue ▶](#)

# Existing Producers - Associating With a Feedstock Aggregator

Feedstock Aggregator Company Search

What To Do

Please enter the information of the company you would like to associate to and hit search.

**Company Name and Location**

Company ID:

Company Name

Street Address:

Street Address (Line 2):

City:  State/Province:

Postal Code:  Country:

# Existing Producers - Associating With a Feedstock Aggregator

Search Results

Show  entries Filter Companies

Company Id	Company Name	Address	Actions
1865	Renewable Fuel - Feedstock Aggregator	123 Main St Centreville, VA 20120	<a href="#">Select</a>

Showing 1 to 3 of 3 entries Previous **1** Next

# Existing Producers - Associating With a Feedstock Aggregator

Facility Feedstock Aggregator Information

**Select Facility: \***

TEST

**Select Pathway: \***

Fuel Code:40/ Process Code:888/Feedstock Code:160/Fuel Type:D6

**Provide a start year \***      **Provide an end year**

2023

Back    Cancel    **Add**

# Existing Producers - Associating With a Feedstock Aggregator

Feedstocks Supplied by Feedstock Aggregator

[Add Feedstock Aggregator](#)

Show  entries Filter Feedstock Aggregator Supplied Feedstocks

Fuel Code	Process Description Code	Feedstock Code	Fuel Type Code	Feedstock Aggregator Company (ID)	Feedstock Aggregator Facility (ID)	Start Year	End Year	Active	Actions
Non-ester ... <a href="#">More</a>	Grandfathe... <a href="#">More</a>	Biogenic W... <a href="#">More</a>	Renewable Fuel(D6)	Renewable Fuel - Feedstock Aggregator (1865)	TEST (512561)	2023	No End Year Provided	Yes	<a href="#">Edit</a> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous **1** Next

[Back](#) [Save](#) [Save & Continue](#)

# Existing Producers - Associating With a Feedstock Aggregator

Facility Management

Show  entries Add Facility

Filter Facilities

ID	Name	Type	Status	Location	Actions
OTAQREG10024928	EAST TEXAS RENEWABLES, LLC	• Gas/Ethanol	Update	12942 FM2767 TYLER, TX 75708	<a href="#">View</a> <a href="#">View Reporting IDs</a> <a href="#">Edit</a> <a href="#">Delete</a>

Showing 1 to 1 of 1 entries Previous **1** Next

[Back](#) [Save](#) [Save and Review](#)

# Existing Producers - Associating With a Feedstock Aggregator

Request Information

<b>Request ID:</b> FAC-26920	<b>Created On:</b> 08/18/2023
<b>Request Type:</b> Update Facility	<b>Modified On:</b> 08/18/2023
<b>Request Status:</b> Draft	<b>Requestor ID:</b> R USER_NAME
<b>Company Name:</b> Renewable Fuel Producer - Test [1601]	<b>Requestor Name:</b> Firstnm Lastnm
<b>Submission:</b> Initial	

**Facility Pathways**

Show  entries Filter pathways

Fuel Code	Process Description Code	Feedstock Codes	Fuel Type Code	Co-Product Codes	FFARS ID	Capacity Type	Capacity (gallons)	Pathway Feedstock(s) Supplied By Feedstock Aggregator?
Non-ester Renewable Diesel (EV 1.7)(40)	Grandfathered (Other) (888)	Biogenic Waste Oils/Fats/Greases (160) - <a href="#">N/A Less</a>	Renewable Fuel (D6)			Permitted Capacity	288,000,000	Yes

**Feedstocks Supplied by Feedstock Aggregator**

Show  entries Filter Feedstock Aggregator Supplied Feedstocks

Fuel Code	Process Description Code	Feedstock Code	Fuel Type Code	Feedstock Aggregator Company (ID)	Feedstock Aggregator Facility (ID)	Start Year	End Year	Active
Non-ester Renewable Diesel (EV 1.7)(40) <a href="#">Less</a>	Grandfathered (Other)(888) <a href="#">Less</a>	Biogenic Waste Oils/Fats/Greases(160) <a href="#">Less</a>	Renewable Fuel(D6)	Renewable Fuel - Feedstock Aggregator (1865)	TEST (512561)	2023	No End Year Provided	Yes

⏪ Home Page
⏪ Back
✖ Cancel Request
Sign and Submit

⏪ Home Page
⏪ Back
✖ Cancel Request
Submit and Notify RCO

# Existing Producers - Associating With a Feedstock Aggregator

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Accept

Decline

eSignature Widget

## 1. Authentication

Log into CDX

User:

DEMOUSER

Password:

.....

Show Password

## 2. Verification

Question:

What is your favorite movie?

Answer:

Show Answer

Correct Answer

## 3. Sign File

Sign

My Requests

Pending

Withdrawn

Rejected

Show 10 entries

Search: 26854

Request ID	Request Type	Request Subject	Submitted By	Date Last Updated	Status
FAC-26920	Update Facility	Renewable Fuel Producer ABC - 1875	USER_NAME	08/02/2023	Awaiting Initial Review

Showing 1 to 1 of 1 entries (filtered from 8 total entries)

Previous 1 Next

# Additional Job Aids Available

- Job Aids for Fuels Programs Registration System (OTAQREG)  
<https://www.epa.gov/fuels-registration-reporting-and-compliance-help/job-aids-fuels-registration-system-otaqreg>
  - How to Register a New Company as a Feedstock Aggregator
  - How to Register a Biointermediate Producer with Feedstock Aggregator
  - How to Register a Renewable Fuel Producer with Associated Feedstock Aggregator
  - How to Update a Renewable Fuel Producer with Associated Feedstock Aggregator



For the Q&A portion of this workshop, email generally applicable questions about implementation of the regulations to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)



# Updates to RFS Registration

Jaimee Dong

Office of Transportation and Air Quality

September 7, 2023

# Presentation Content

- Independence Requirements for Professional Engineers
- Changes to Three-year Engineering Review Updates
  - Introduction to the “Cohort” concept
  - New flexibility when Engineering Reviews are submitted early
  - $V_{RIN}$  requirements
- The purpose of this presentation is to highlight changes for Engineering Reviews (ERs) and Professional Engineers
  - This may affect Renewable Fuel Producers' decisions going forward on timing of site visits for ERs

# Independence Requirements for PEs

- In addition to other requirements, PEs must meet 80.1450(b)(2)(ii):
  - The independent third-party engineer and its contractors and subcontractors must meet the independence requirements specified in § 80.1471(b)(1), (2), (4), (5), and (7) through (12)
- These requirements do not go into effect until February 1, 2024; there is no impact to engineering reviews submitted on or before January 31, 2024
  - Note that new independence requirements for QAP auditors go into effect on September 11, 2023

# Independence Requirements for PEs (cont'd)

- The professional engineer and its contractors and subcontractors MUST:
  - Act impartially when performing all activities
  - Be free from any interest in the audited party's business and receive no financial benefit from the outcome of auditing service, apart from payment for the auditing services
  - Ensure that all personnel involved in the third-party audit (including the verification activities) under 80.1471 are not negotiating for future employment with the owner or operator of the audited party
    - At a minimum, prior to conducting the audit, the professional engineer must obtain an attestation (or similar document) from each person involved in the audit stating that they are not negotiating for future employment with the owner or operator of the audited party
  - Have written policies and procedures to ensure that the professional engineer and all personnel under the professional engineer's direction or supervision comply with the competency, independence, and impartiality requirements of 80.1471

# Independence Requirements for PEs (cont'd)

- The professional engineer and its contractors and subcontractors must NOT:
  - Be owned or operated by the audited party or by an obligated party, or any subsidiary or employee of the audited or obligated party
  - Be debarred, suspended, or proposed for debarment
  - Have been involved in the design or construction of the audited facility
- The audited party must be free from any interest or the appearance of any interest in the professional engineer's business and the businesses of professional engineer's contractors and subcontractors

# Independence Requirements for PEs

- In summary:
  - PEs need to be free of business interest in those they audit (and vice versa)
  - PEs may not be negotiating for employment with those they audit
  - PEs may not be debarred, suspended, or proposed for debarment
  - PEs may not have been involved with the construction or design of the facility they audit
- Next, we will look at changes to three-year updates to Engineering Reviews

# Three-Year Updates (3YUs) to Engineering Reviews

- The Set Rule introduced the following changes to 3YU:
  - Site visits for 3YU must be performed on or after July 1 of the calendar year prior to the January 31 deadline for submission
  - However, there is some flexibility for facilities that have engineering reviews done early
  - $V_{RIN}$  portions of 3YU must be based on batches of renewable fuel produced through at least the second quarter of the calendar year prior to the applicable January 31 deadline
- These requirements do not go into effect until February 1, 2024
  - There is no impact to engineering reviews submitted on or before January 31, 2024

# The Concept of a Cohort

- All facilities that require 3YUs fit into one of three “cohorts”
  - The original cohort is based upon the year that EPA activated the facility’s registration (not the date upon which the registration was submitted)
  - The initial registration year for each facility can be found at:  
<https://www.epa.gov/fuels-registration-reporting-and-compliance-help/schedule-three-year-update-reports-engineering>

Cohort Deadlines		
Cohort	Initial Activation Year	Scheduled ER Due Date
1	2010	1/31/2013
2	2011	1/31/2014
3	2012	1/31/2015
1	2013	1/31/2016
2	2014	1/31/2017
3	2015	1/31/2018
1	2016	1/31/2019
2	2017	1/31/2020
3	2018	1/31/2021
1	2019	1/31/2022
2	2020	1/31/2023
3	2021	1/31/2024
1	2022	1/31/2025
2	2023	1/31/2026
3	2024	1/31/2027
1	2025	1/31/2028
2	2026	1/31/2029
3	2027	1/31/2030
1	2028	1/31/2031

# 3YU Site Visit Dates and Cohorts

- If a facility has a site visit done on or after July 1 of the year prior to the due date of the 3YU, then the facility will remain in the same cohort

Cohort Based on Initial Activation	Scheduled ER Due Date	ER Site Visit Date Range	ER Submitted By Date	Next ER Due	New Cohort
1	1/31/2025	7/1/2024 - 1/31/2025	1/31/2025	1/31/2028	N/A
2	1/31/2026	7/1/2025 - 1/31/2026	1/31/2026	1/31/2029	N/A
3	1/31/2027	7/1/2026 - 1/31/2027	1/31/2027	1/31/2030	N/A

- If a facility has a site visit done prior to July 1, and the registration submission meets all applicable requirements for a 3YU including  $V_{RIN}$  calculations, then the facility will move into another cohort
- This flexibility allows for facilities to submit fewer engineering reviews over time
- If the registration submission does not meet all 3YU requirements, then the facility must still submit a 3YU that does meet all of the applicable regulations, which includes a site visit performed after July 1 prior to the applicable January 31 deadline

# Early Submissions

- If site visits are performed early, the facility moves into a different “cohort”
- This is illustrated in the table below:

Cohort Based on Initial Activation	Scheduled ER Due Date	ER Site Visit Date	Next ER Due	New Cohort
2	1/31/2026	7/1/2024 - 6/30/2025	1/31/2028	1
3	1/31/2027	7/1/2025 - 6/30/2026	1/31/2029	2
3	1/31/2027	7/1/2024 - 6/30/2025	1/31/2028	1
1	1/31/2028	7/1/2026 - 6/30/2027	1/31/2030	3
1	1/31/2028	7/1/2025 - 6/30/2026	1/31/2029	2

- But  $V_{RIN}$  calculations must be included which is addressed in the next slides

# $V_{RIN}$

- For most three-year updates to engineering reviews, the professional engineer is required to check the calculations for  $V_{RIN}$ 
  - Applies to all registered renewable fuel producers that generate RINs in EMTS and are submitting their three-year engineering review update per §80.1450(d)(3)
  - Foreign producers that do not generate RINs on their fuel do not need to submit a  $V_{RIN}$  calculation review from the third-party independent professional engineer
- The Set Rule added the required date range for these calculations to improve the consistency of the reviews and make the requirements clear

# V<sub>RIN</sub> Regulations

- 40 CFR 80.1450(d)(3)(iii):
  - (B) A detailed review of the renewable fuel producer's calculations and assumptions used to determine VRIN of a representative sample of batches of each type of renewable fuel produced since the last registration. This representative sampling must adhere to all the following, as applicable:
    - (1) The representative sample must be selected in accordance with the sample size guidelines set forth at 40 CFR 1090.1805.
    - (2) For updated independent third-party engineering reviews submitted after January 31, 2024, the representative sample must be selected from batches of renewable fuel produced through at least the second quarter of the calendar year prior to the applicable January 31 deadline.

# V<sub>RIN</sub> Date Ranges

- For regular 3YU submissions submitted on time with the site visit performed on or after July 1 of the prior year, the following table applies:

Initial Activation Year	Scheduled ER Due Date	vRIN data range	Next Scheduled ER Due Date	vRIN data range
2022	1/31/2025	Init. Reg. - 6/30/2024	1/31/2028	7/1/2024 - 6/30/2027
2023	1/31/2026	Init. Reg. - 6/30/2025	1/31/2029	7/1/2025 - 6/30/2028
2024	1/31/2027	Init. Reg. - 6/30/2026	1/31/2030	7/1/2026 - 6/30/2029

# V<sub>RIN</sub> Date Ranges (cont'd)

- The following table illustrates the V<sub>RIN</sub> date ranges required when 3YU are submitted early:

Cohort Based on Initial Activation	Scheduled ER Due Date	ER Site Visit Date	vRIN Data Range	Next ER Due	New Cohort	(Previous ER Submitted)	(Next "Normal" vRIN Data Range)
2	1/31/2026	7/1/2024 - 6/30/2025	7/1/2022 - 6/30/2024	1/31/2028	1	1/31/2023	7/1/2024 - 6/30/2027
3	1/31/2027	7/1/2025 - 6/30/2026	7/1/2023 - 6/30/2025	1/31/2029	2	1/31/2024	7/1/2025 - 6/30/2028
3	1/31/2027	7/1/2024 - 6/30/2025	7/1/2023 - 6/30/2024	1/31/2028	1	1/31/2024	7/1/2024 - 6/30/2027
1	1/31/2028	7/1/2026 - 6/30/2027	7/1/2024 - 6/30/2026	1/31/2030	3	1/31/2025	7/1/2026 - 6/30/2029
1	1/31/2028	7/1/2025 - 6/30/2026	7/1/2024 - 6/30/2025	1/31/2029	2	1/31/2025	7/1/2025 - 6/30/2028

# Summary and Conclusion

- PEs have new independence requirements that must be met starting February 1, 2024
- Site visits for three-year updates for ERs must be performed on or after July 1 of the calendar year prior to the due date after the January 31, 2024 deadline
- New  $V_{RIN}$  requirements for ERs must include data from the period through at least the second quarter of the calendar year prior to the applicable January 31 deadline
- If site visits are performed early, and all applicable requirements are met, the three-year update schedule for the facility will be changed allowing for fewer ERs over time
- EPA will begin implementing the new requirements, including updates to the ER webform and additional information regarding cohorts and deadlines on our webpage



For the Q&A portion of this workshop, email generally applicable questions about implementation of the regulations to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)



# Take time for tea!

By 3:20 pm EDT, send generally applicable questions to [FuelsProgramsReporting@epa.gov](mailto:FuelsProgramsReporting@epa.gov)

Question and Answer Period will start at 3:20 pm EDT



# Question and Answer

Robert Anderson

Office of Transportation and Air Quality

September 7, 2023

# Question and Answer

- Current question:
  - Could we get a copy of the presentation and or a link to a replay?

# Question and Answer

- Current question:

Hello – for the webinar, could you add a description of the timing of RIN generation and transfer? Is RIN generation monthly with monthly batching of RNG? And how many days after the end of the month are the RINs transferred? As you know, for liquids it is within 5 days of title transfer, so having some clarity here would be helpful.

# Question and Answer

- Current question:

Will other gas analyzer technologies, besides gas chromatographs, be allowed to provide monitoring on the raw or processed gas streams?

# Question and Answer

- Current question:

To fall within the requirement of 80.155 - it is stated that the following must occur, firstly the party must demonstrate that they are unable to use the applicable GC / Flow meters mentioned in part (a), and secondly that the alternative measurement protocol being used is at least as accurate and precise as the methods specified in part (a). Is there any guidance that could be offered regarding to what the EPA will consider a suffice means to demonstrate that an applicable GC/Flow meter from part (a) is unable to be used by a biogas / RNG producer, as well as any specifics requirements to demonstrate that the alternative method is as accurate as the applicable GC/Flow meter.

# Question and Answer

- Current question:
- Below are my questions regarding the EPA SET Rule Webinar:
- What roles and/or responsibilities does the “RIN Owner” have in the commercial pipeline pathway?
- If the commercial pipeline is regulated by FERC and does not require some of the parameters required under the new SET rule, will the RNG producer still need to sample for parameters not required by the pipeline (e.g. siloxanes, biogenic carbon, etc.)?
- What is the process for applying for exemptions, especially for existing facilities with established metering and gas analyzing equipment?

# Question and Answer

- Current question:

If a RNG producer is not planning on generating RINs beyond Dec 31, 2024 at a legacy facility—but will instead use the RNG for its internal uses—does it still need to register under the BRRR by Oct 1, 2024?

# Question and Answer

- Current question:

In today's webinar, you mentioned revisions to EMTS to accommodate the new BRRR rules. Do you anticipate revisions to the file formats for uploads to EMTS? If so, can you estimate when the revised schema will be available?

# Question and Answer

- Current question:
- You provided the timeline for when 1st and last RNG RINs could be generated under the new and old RNG regs, respectively, as Aug 2024 and Jan 2025. **However, what is the timeline for new RNG Separator registrations and when does EPA envision first and last RNG RINs to be separated under the new and old regs?** E.g., will there be overlap of the parties (RNG producers AND CNG/LNG dispensers) eligible to separate RNG RINs between Aug 2024 and Jan 2025? Or will all RNG RINs be required to be separated under the new regs for all RNG RINs generated from Aug 2024 onward?
- **What is the process for a party to request EPA to approve an Alternative Measurement Protocol under 80.155?**
  - The concern is that if a party needs to wait until registration to request approval, it could create costly delays in registration approval (especially given pre-registration storage is no longer allowed).
  - Uncertainty around what EPA will approve as Alternative Measurement Protocol and how to request that approval could also delay procurement decisions for new devices (which come with potentially significant added costs and downtime for installation)
- **Additionally, if a biogas producer/RNG producer/RNG RIN separator that was registered under the old regs with previously allowed measurement equipment/devices that are not compliant with 80.155 (a)(1) and (2) is unable to procure and install compliant devices prior to the new registration deadlines, will EPA issue any waivers, or extensions to the new 80.155 requirements?**
  - The concern is that demand for specific measurement devices created from the new regs could cause delays in ability to acquire and install compliant devices ahead of the new deadlines and existing RIN generating facilities will have to pause RIN generation.

# Question and Answer

- Current question:

On Feedstock Aggregator registration, how are aggregator datapoints validated by the IT system i.e. are addresses validated using google maps, are Responsible Corporate Officer names validated against National Corporate Registry databases? Are the datapoints for New Feedstock Aggregators validated manually by EPA against any criteria? This question also relates to non-USA registered companies.

# Question and Answer

- Current question:

The presentation used 7/1 as the start of the VRIN review period for all cohorts. But the RFS requires VRIN review to start from where the last one ended, correct? So for the first round of 3YUs for each facility following the set rule effective date, the start date of the RIN review period will be based on when the last VRIN review period ended, correct? Then 7/1 going forward.

# Question and Answer

- Current question:

As a producer associating to an aggregator, do you need to have two separate pathways, if some of the feedstock is supplied by an aggregator, and some is not? Example; if you have a corn oil feedstock pathway and some of the corn oil is supplied by an aggregator and some is, do you need two separate corn oil pathways?

# Question and Answer

- Current question:

Can you speak a bit further on the biogenic testing requirements for biogas/RNG as part of their COAs, specifically which party will be responsible for the testing if the biogas producer is separate and will the COAs start to be required at the first three year reviews after 2024?

# Question and Answer

- Current question:

I understand that in the RNG in commercial pipelines scenario the RNG producer is the RIN generator and that they generate RINs at the time the RNG is injected into the commercial pipeline. What is the timing for uploading the RIN generation into EMTS?



# Closing

Mary Manners

Office of Transportation and Air Quality

September 7, 2023

# Additional Resources

- For any questions that are not answered during the Q&A session, please email [FuelsProgramSupport@epa.gov](mailto:FuelsProgramSupport@epa.gov)
- Slides for this workshop will be posted at: <https://www.epa.gov/renewable-fuel-standard-program/rfs-set-rule-implementation-webinar>
- For job aids for Set Rule implementation, go to: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>
- Regulatory changes associated with the Set Rule will be effective in the eCFR on or around September 11, 2023, and will be available at: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-80?toc=1>
- A redline-strikeout version of the RFS regulations with Set Rule regulatory changes is also available at: <https://www.regulations.gov/document/EPA-HQ-OAR-2021-0427-1126>



Thank you!