



Set Rule Implementation Webinar Introduction

Mary Manners
Office of Transportation and Air Quality
April 12, 2024



About this Webinar

- 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 will not discuss the merits of the regulatory requirements but are rather intended 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 do not supplant or otherwise amend the regulatory requirements. Parties must comply with the applicable regulatory requirements regardless of whether and how those requirements are discussed in these presentations.
- The discussion in these presentations does not represent present or future EPA decisions or actions in any particular circumstance and does 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.
- Submit any questions to the Fuels Program Helpdesk at FuelsProgramSupport@epa.gov.
- Presentations will be posted at: <https://www.epa.gov/renewable-fuel-standard-program/rfs-set-rule-implementation-webinars>.

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 BRRR.

Agenda

Time (EDT)	Topic	Presenter
11:00 am	Introduction	Mary Manners
11:10 am	Set Rule Implementation Timeline Overview	Robert Anderson
11:15 am	BRRR Implementation Overview	John Weihrauch
12:15 pm	Break	
12:30 pm	BRRR Registration: System Demonstration	John Weihrauch
1:45 pm	BRRR Registration: Forms and Policies	Robert Anderson
2:15 pm	Curated Question and Answer	Robert Anderson
3:30 pm	Closing	Mary Manners



Submit any questions to the Fuels Program Helpdesk at FuelsProgramSupport@epa.gov.



Set Rule Implementation Timeline

Overview

Robert Anderson

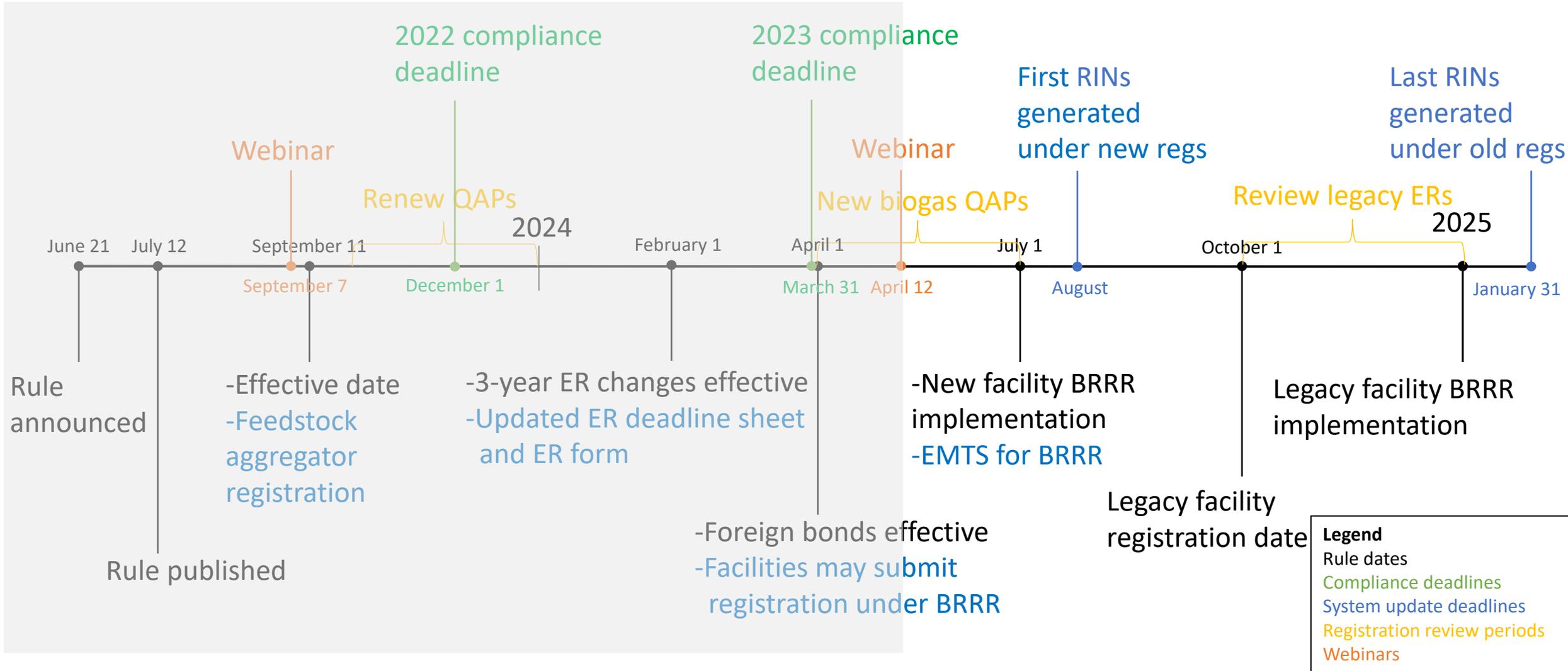
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Key implementation steps review

- BRRR
 - ✓ Update OTAQReg to allow for biogas producer, RNG producer, and RNG RIN separators to register under BRRR
 - Update EMTS to track biogas and RNG
 - Review new QAPs and registrations for BRRR
- Mixed Digesters
 - ✓ Update EMTS for mixed digester provisions
- Three-year registration updates (3YU)
 - ✓ Update calendar for 3-year ER due dates
 - Update ER webform for VRIN calculation compliance
- Third-party enhancements
 - Update ER webform to add independence requirement statement for PEs
 - ✓ Integrate new independence requirements into 2024 QAP plans
- SFW Records
 - ✓ Implement association between SFW aggregators and renewable fuel producers in OTAQReg
- Foreign Bonds
 - ✓ Directly work with affected foreign parties to update bonds

Timeline for Implementation





Submit any questions to the Fuels Program Helpdesk at FuelsProgramSupport@epa.gov.



BRRR Registration & Reporting Overview

John Weihrauch

Office of Transportation and Air Quality

April 12, 2024

Topics Covered

1. Goals of this Presentation
2. New Regulated Parties and Roles Under BRRR
3. Registration, Association, QAP, and Reporting by Party
4. Putting it All Together – BRRR Information Flows
5. Summary of BRRR Impacts on RFS

Goals of this Presentation

- BRRR implementation overview –
 - 30,000-foot level and try to avoid getting too deep in the weeds
 - Introduce new concepts and terms; highlight functional changes
 - Make a connection between BRRR regulations and EPA's IT approach to implementing registration and reporting requirements
 - Additional details will come with documentation (e.g., job aids)
- Submit questions to the helpdesk at: FuelsProgramSupport@epa.gov

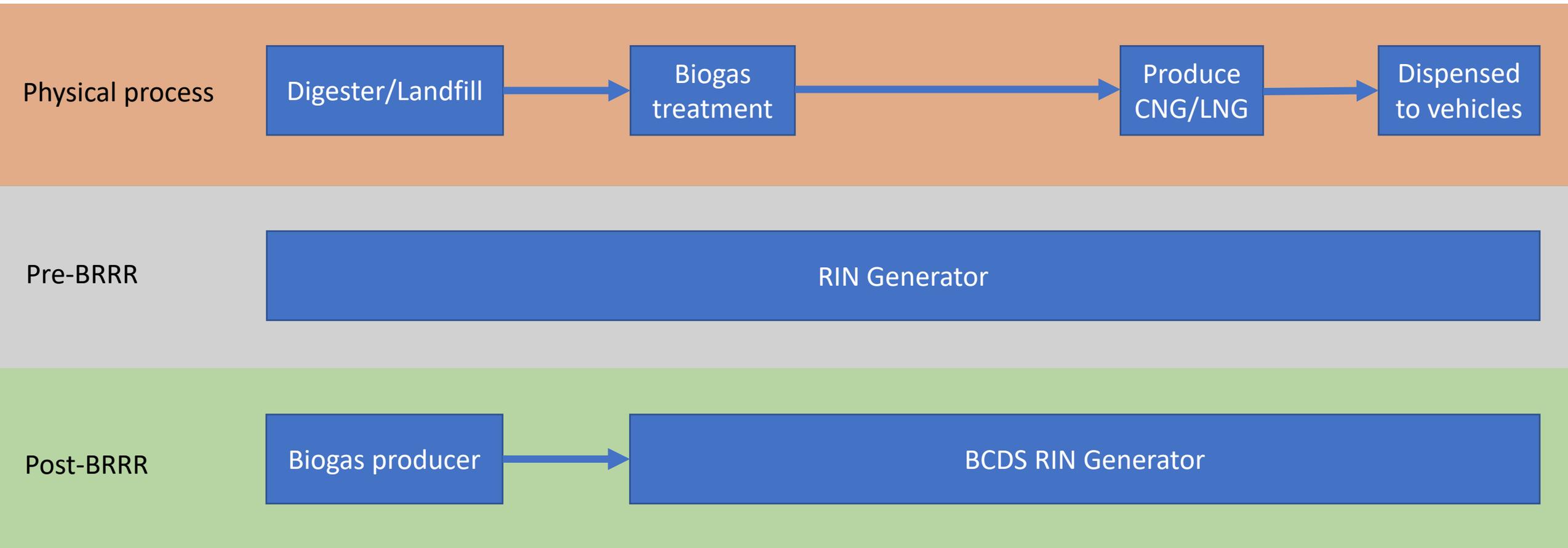
BRRR Biogas-derived Renewable Fuel Pathways

- Two types –
 - Biogas is upgraded and used without being mixed with natural gas (**Biogas Closed Distribution System, BCDS** or “closed system”)
 - CNG/LNG
 - Biogas is upgraded to renewable natural gas (RNG) and placed on a **Natural Gas Commercial Pipeline System**
 - Domestic RNG
 - Foreign Produced RIN-less RNG

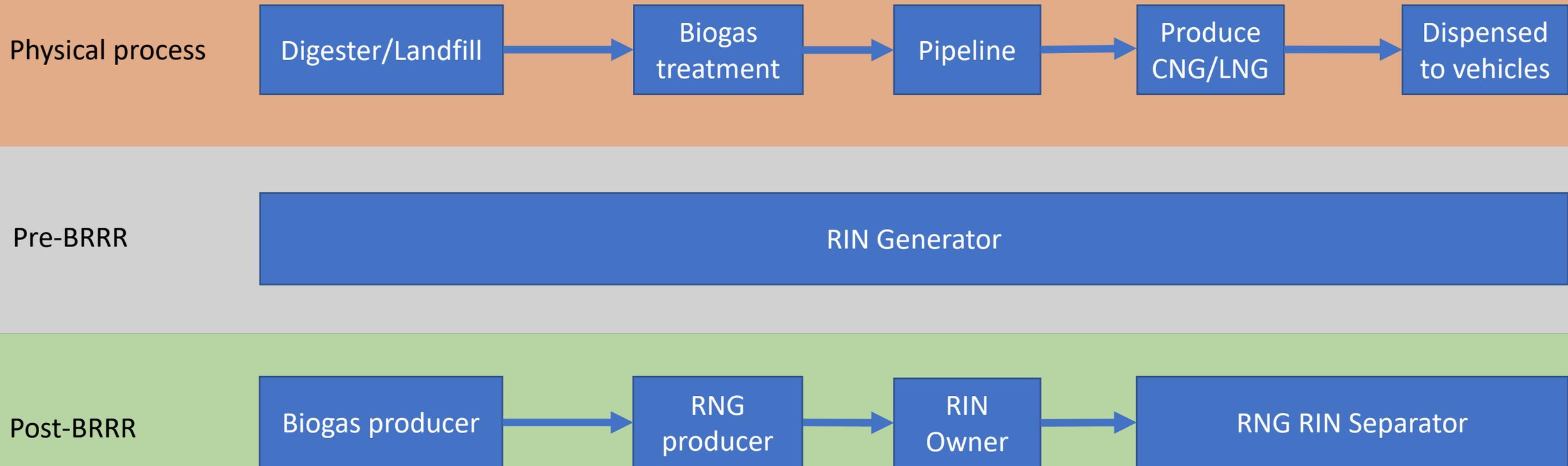
Regulated Parties and Roles Under BRRR

- Who are the regulated parties under BRRR and what are their roles?
 - Biogas Producers
 - Source of biogas for CNG/LNG/RNG
 - Includes landfills, wastewater treatment plants, agricultural digesters, etc.
 - RNG Producers
 - Domestic RNG Producers
 - Foreign RIN-less RNG Producers
 - Importers of RIN-less RNG; RNG RIN Generator
 - CNG/LNG Producers (updated under BRRR)
 - Closed system
 - RNG RIN Separators

Parties - Biogas Closed Distribution System (BCDS)



Parties - Commercial Pipeline



Registration, Association, QAP, and Reporting

- Parties covered
 - Biogas Producers (open and closed system)
 - RNG Producers (RIN generators)
 - Domestic
 - Foreign RIN-less RNG Producers & Importers RIN-less RNG
 - CNG/LNG RIN generators
 - Transitioning from legacy to BRRR-era
 - RNG RIN Separators
- We will highlight and demo registration and association processes later today in this webinar
- Annual attest engagements are required
- Reporting will leverage EMTS to the greatest extent possible

Biogas Producers

- Registration
 - Biogas producers are regulated parties under BRRR that supply qualifying biogas to renewable fuel producers
 - Company, Facility(s) provide information and attributes about their production facility(s) such as location and process employed
 - Pathways defined by updated/new Fuel Category Codes;
 - 195 – Renewable Compressed Natural Gas (CNG)
 - 205 – Renewable Liquefied Natural Gas (LNG)
 - 215 – Renewable Natural Gas (RNG)
- Association
 - Biogas producers must identify their renewable fuel producing customers through association; this includes associating with CNG/LNG production in a BCDS
 - May supply biogas to a single customer or multiple customers
- QAP
 - Biogas producers inherit QAP obligations based on their customer's QAP
 - May need to work with multiple QAP providers and will need to associate with those QAP providers

Biogas Producers continued

- Reporting
 - Biogas batch production reporting will be incorporated into EMTS
 - EMTS is the application for generating and transacting renewable fuel credits
 - A batch is up to a single calendar month's production; however, multiple batches may be produced –
 - By source (facility)
 - By biogas source/type (cellulosic D-3 vs. advanced D-5 [mixed digester], manure type [ag digester], etc.)
 - By QAP status, and QAP provider
 - Reporting of biogas batch production will be similar to the process for renewable fuel batches
 - Each biogas batch produced will result in the generation of Biogas “Tokens” (RINs are generated for renewable fuels)
 - One biogas token = 1 mmBtu HHV
 - Quantities of biogas must be transferred to renewable fuel producers along with corresponding Tokens.
 - Tokens must be transacted for all RNG/CNG/LNG including those used intra-company

RNG Producers

- Registration
 - Producers of RNG are RIN generators (except foreign RNG producers); all must register
 - Company, Facility(s) provide information and attributes about their production facility(s) such as location, pathways, processes employed, pipeline interconnect, etc.
- Association
 - Facility(s) identify biogas supplier(s) that source biogas consistent with the renewable fuel pathway(s) they have registered
- QAP
 - RNG producers using QAP must identify and associate with a QAP provider for each pathway QAP'ed.

RNG Producers continued

- Reporting (Domestic RNG Producer)
 - RNG batch production reporting will be incorporated into EMTS and result in RINs
 - A batch of RNG is up to a single calendar month's production; however, multiple batches may be produced –
 - By source (facility)
 - By biogas source and type (cellulosic vs. advanced [mixed digester], manure type [ag digester], etc.)
 - By pipeline interconnect location
 - By QAP status, and QAP provider
 - RNG RIN generation is dependent on retiring biogas Tokens
 - One mmBtu HHV biogas token retired will allow generation of about 11.6935 RNG RINs
 - Conversion of 1 mmBtu HHV to mmBtu LHV is about 0.9004 mmBtu LHV (quantity mmBtu LHV = y mmBtu HHV x 0.9004)
 - Conversion of 1 mmBtu LHV to RINs is about 12.987 RINs (quantity RINs = x mmBtu LHV / 0.077)
 - Biogas token fuel category must align with renewable fuel pathway
 - Biogas token QAP provider info must match renewable fuel QAP provider info; for non-QAP'ed renewable fuel, any biogas token QAP status may be used
 - RNG RINs will be distinguishable in EMTS from other RINs since they may only be separated by an RNG RIN separator

RNG Producers continued

- Reporting (Foreign RNG Producer; RIN-less RNG token generation)
 - Capability under development. [Initial implementation of foreign RNG batch production reporting will use existing imported renewable fuel workflow]
 - A batch of RNG is up to a single calendar month's production; however, multiple batches may be produced –
 - By source (facility)
 - By biogas source and type (cellulosic vs. advanced [mixed digester], manure type [ag digester], etc.)
 - By pipeline interconnect location
 - By QAP status, and QAP provider
 - RIN-less RNG production will result in generation of an RNG token.
 - RNG token generation is dependent on retiring biogas tokens; one biogas token mmBtu HHV retired will allow generation of about 0.9004 RNG tokens mmBtu LHV
 - Conversion of 1 mmBtu HHV to mmBtu LHV is about 0.9004 mmBtu LHV (quantity mmBtu LHV = y mmBtu HHV x 0.9004)
 - RNG tokens must be transferred with RNG to an RNG Importer

RNG Producers continued

- Reporting (RNG Importer; RIN generation)
 - Capability under development. [Initial implementation of foreign RNG batch production reporting will use existing imported renewable fuel workflow]
 - RNG is received with RNG Tokens from the foreign RIN-less RGG producer to the importer
 - RNG RIN generation is dependent on retiring RNG Tokens and quantity of RNG received
 - One RNG token retired will allow generation of one RNG RIN
 - Conversion of 1 mmBtu LHV to RNG RINs is about 12.987 RNG RINs (quantity RINs = $x \text{ mmBtu LHV} / 0.077$)
 - RNG token fuel category must align with renewable fuel pathway
 - RNG token QAP status must be consistent with renewable fuel QAP status

CNG/LNG RIN Generators

- Transition Period
 - There will be some overlap as inventory of legacy pipeline gas winds down and inventories under BRRR are established
 - Legacy CNG/LNG available only until December 31, 2024
 - Registration accepted by EPA prior to July 1, 2024
 - Fuel Category Codes for CNG/LNG will be sunset
 - 190 – Renewable Compressed Natural Gas
 - 200 – Renewable Liquefied Natural Gas
 - BRRR CNG/LNG new/updated registrants beginning July 1, 2024
 - Registration no later than October 1, 2024, for legacy producers
 - New Fuel Category Codes -
 - 195 – Renewable Compressed Natural Gas (CNG)
 - 205 – Renewable Liquefied Natural Gas (LNG)

CNG/LNG RIN Generators continued

- Registration (under BRRR)
 - Beginning July 1, 2024, CNG/LNG new registrations must comply with BRRR requirements
 - Company, Facility(s) provide information and attributes about their production facility(s) such as location, production capacity, pathways, processes employed, etc.
 - New fuel category codes for BRRR
 - 195 – Renewable Compressed Natural Gas (CNG)
 - 205 – Renewable Liquefied Natural Gas (LNG)
- Association
 - Facility(s) identify biogas supplier(s) that source biogas consistent with the renewable fuel pathway(s) they have registered
 - CNG/LNG producers with biogas production on-site, must also associate
- QAP
 - CNG/LNG producers using QAP must identify and associate with a QAP provider for each pathway QAP'ed.

CNG/LNG RIN Generators continued

- Reporting
 - CNG/LNG batch production reporting will be incorporated into EMTS and result in RINs
 - A batch of CNG/LNG is up to a single calendar month's production; however, multiple batches may be produced –
 - By source (facility)
 - By biogas source and type (cellulosic vs. advanced [mixed digester], manure type [ag digester], etc.)
 - By QAP status, and QAP provider
 - CNG/LNG RIN generation is dependent on retiring biogas Tokens
 - One mmBtu HHV biogas token retired will allow generation of about 11.6935 CNG/LNG RINs
 - Conversion of 1 mmBtu HHV to mmBtu LHV is about 0.9004 mmBtu LHV (quantity mmBtu LHV = y mmBtu HHV x 0.9004)
 - Conversion of 1 mmBtu LHV to RINs is about 12.987 RINs (quantity RINs = x mmBtu LHV / 0.077)
 - Biogas token fuel category must align with renewable fuel pathway
 - Biogas token QAP provider info must match renewable fuel QAP provider info; for non-QAP'ed renewable fuel, any biogas token QAP status may be used
 - CNG/LNG RIN separation requirements have not changed from legacy to BRRR

RNG RIN Separators

- Registration
 - RNG RINs may only be separated by a registered RNG RIN Separator
 - An RNG RIN Separator must include in their registration location(s) for:
 - Natural Gas pipeline withdrawal point(s) name and location information
 - CNG/LNG dispensing location(s) name and location information
- Association
 - None
 - RINs are fungible, but RNG RINs will be distinguishable from other RIN types.
- QAP
 - None

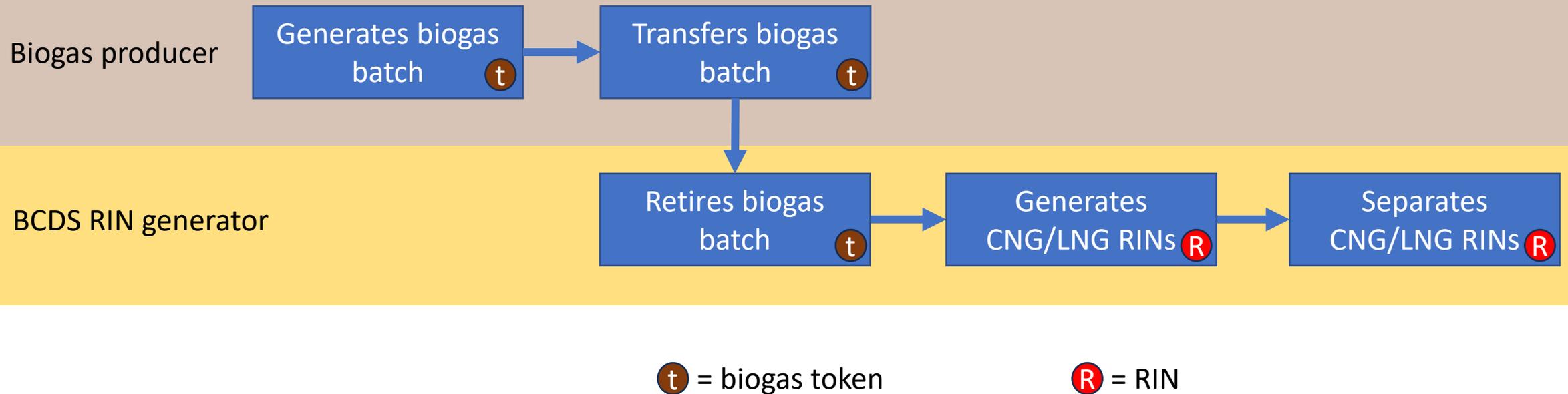
RNG RIN Separators

- Reporting
 - RNG RIN Separation will be reported using EMTS
 - Name and location of withdrawal point where RNG was taken from the natural gas pipeline
 - Quantity of RNG in mmBtu LHV and SCF withdrawn
 - Quantity of CNG/LNG (separately) dispensed
 - Dispensing location(s)
 - Volume of CNG/LNG (separately) in mmBtu LHV and SCF dispensed as transportation fuel.
 - A new RIN separation code for RNG RIN separation will be added to the list of separation codes.

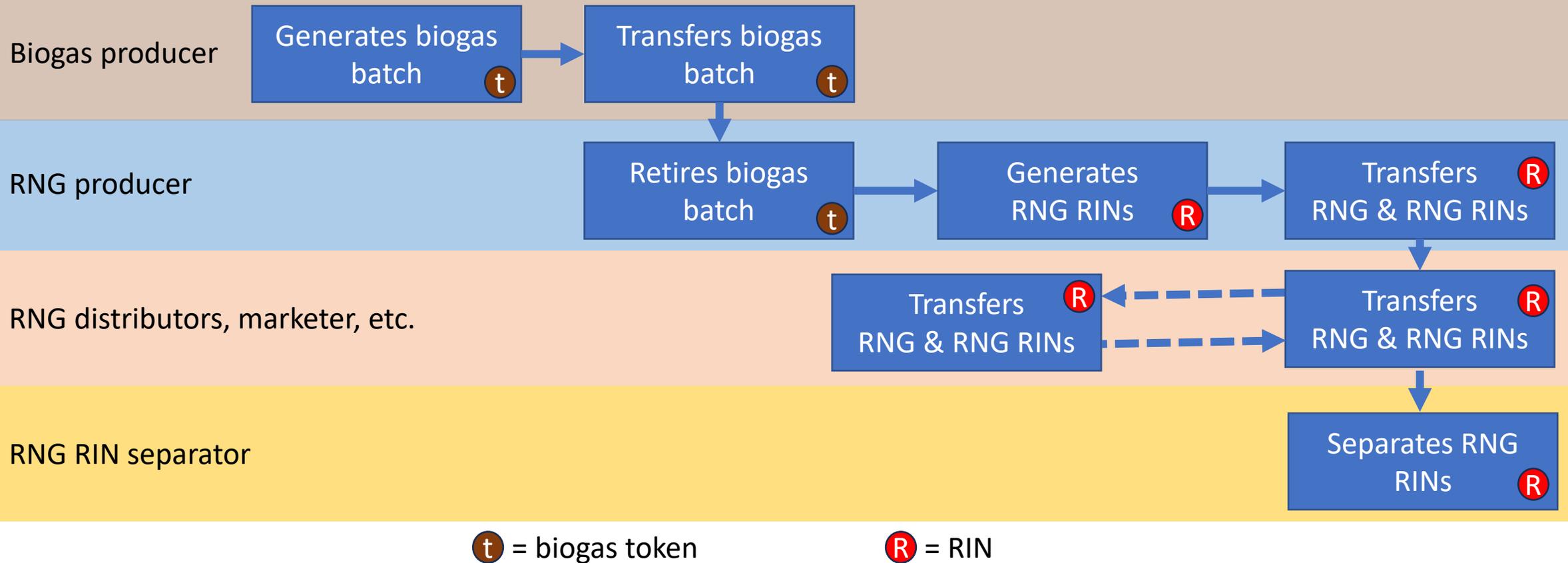
Putting it All Together

- Information Flows
 - Closed System (CNG/LNG)
 - Domestically produced RNG
 - Foreign produced RIN-less RNG Import

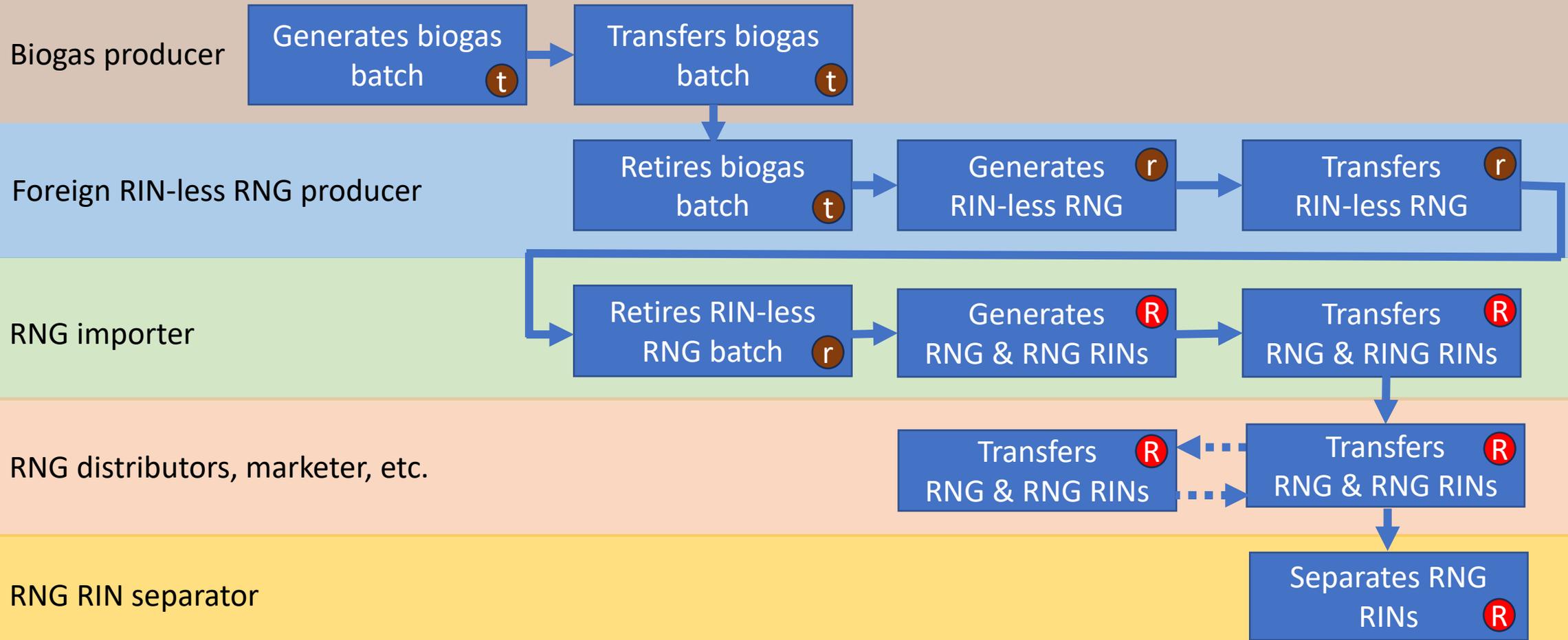
Information Flow Between Parties - BCDS



Information Flow Between Parties - Commercial Pipeline; Domestic



Information Flow Between Parties – Commercial Pipeline; Foreign RIN-less RNG



Summary of BRRR Impacts on RFS

- Biogas production:
 - Reporting of biogas production will be done via EMTS
 - Transfers between biogas producer and RIN generator is being incorporated into EMTS.
- RNG RIN generation and CNG/LNG RIN generation is dependent on the quantity of qualifying biogas available (i.e., biogas tokens) to the renewable fuel producer at the time of RIN generation.
- RNG RINs have unique and specific separation requirements and will be tracked in EMTS while they are assigned.
 - RNG RINs cannot automatically be separated by an obligated party.
 - Only a registered RNG RIN Separator may separate RNG RINs.
- While RNG RINs are “Assigned RINs” they will be uniquely identifiable and distinct from other like D-code, Q-RIN status, etc., RINs.
- Once RNG RINs are Separated RINs, they will be completely fungible with other RINs of like D-code, Q-RIN status, etc.

Take a break and
caffeinate!

Return at 12:30 pm EDT

Send questions to
FuelsProgramSupport@epa.gov





BRRR Registration Demos

John Weihrauch

Office of Transportation and Air Quality

April 12, 2004

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

BRRR Job Aids Available

Available on our site

- How to Associate Your Biogas Producer w/ a QAP Provider
- How to Associate Your Biogas Producer w/ an RFP
- How to Register as an RNG RIN Separator
- How to Update Company Program Type to a Biogas Producer
- How to Update Company Program Type to an RNG Producer
- How to Update Facilities for RNG

New registration requirements highlighted today

- RNG RIN Separator
- Biogas producer
- RNG producer

Prerequisites

CDX User Account and Access

- User must have a Central Data Exchange (CDX) account
- User must be able to log into the CDX OTAQREG program service

Fuels Registration, Reporting, and Compliance Help Web Page

Website

- <https://www.epa.gov/fuels-registration-reporting-and-compliance-help>

Registration

- <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/registration-fuel-programs>

Help

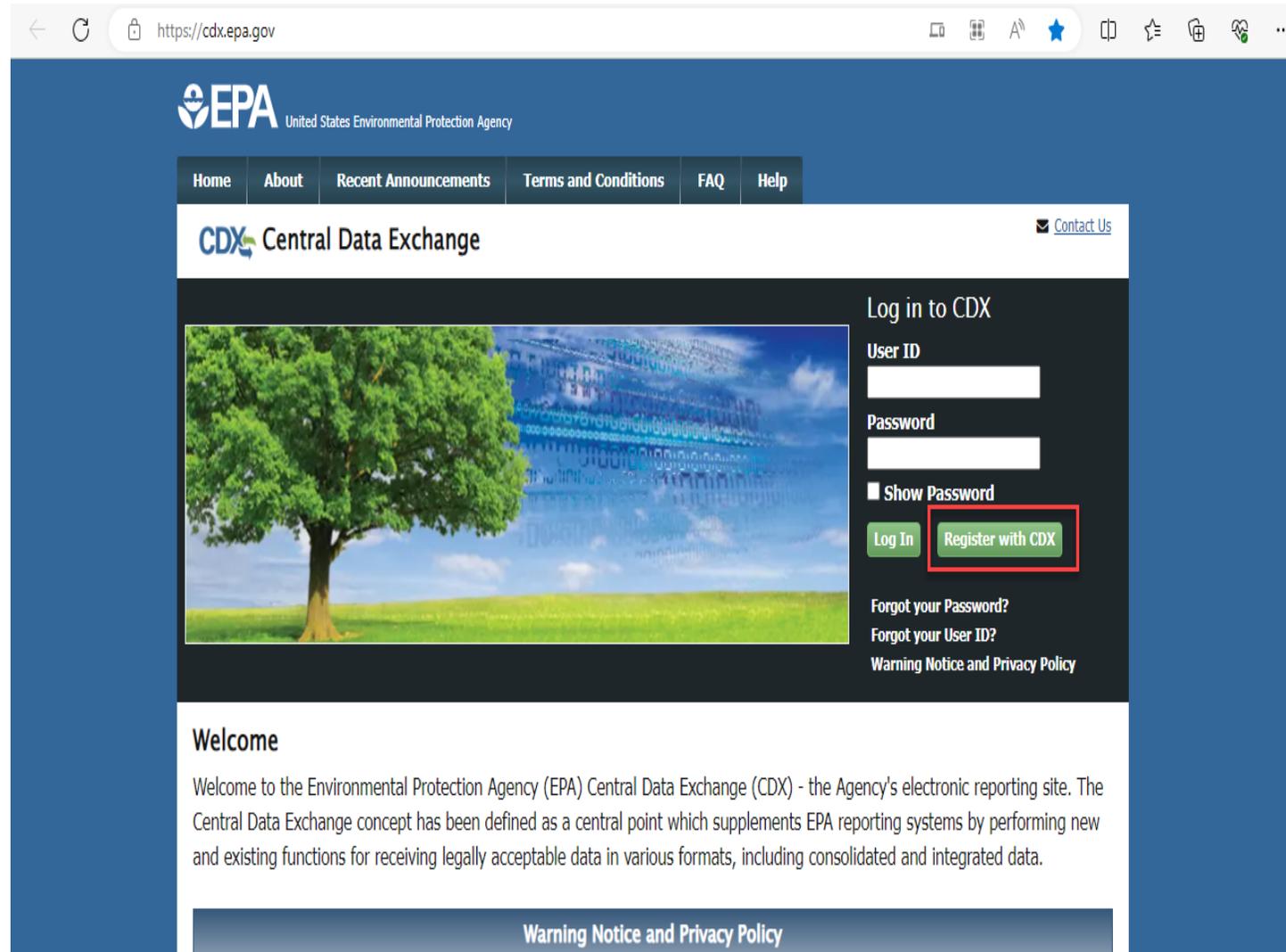
- FuelsProgramSupport@epa.gov

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. A text box on the banner 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 "Subscribe to EnviroFlash alerts" and "View recent EnviroFlashes". At the bottom right is a "Related Topics" box with links for "Air Enforcement", "Diesel Fuel Standards", "Gasoline Standards", and "Renewable Fuel Standard Program".

Establish a Central Data Exchange (CDX) User Account

Prerequisite

- <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 header includes the EPA logo and navigation links: Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. The main content area features a large image of a tree and a field, with a 'Log in to CDX' section on the right. This section contains input fields for 'User ID' and 'Password', a 'Show Password' checkbox, and two buttons: 'Log In' and 'Register with CDX'. The 'Register with CDX' button is highlighted with a red box. Below the login section, there are links for 'Forgot your Password?', 'Forgot your User ID?', and 'Warning Notice and Privacy Policy'. A 'Warning Notice and Privacy Policy' link is also present at the bottom of the page.

Establish a Central Data Exchange (CDX) User Account

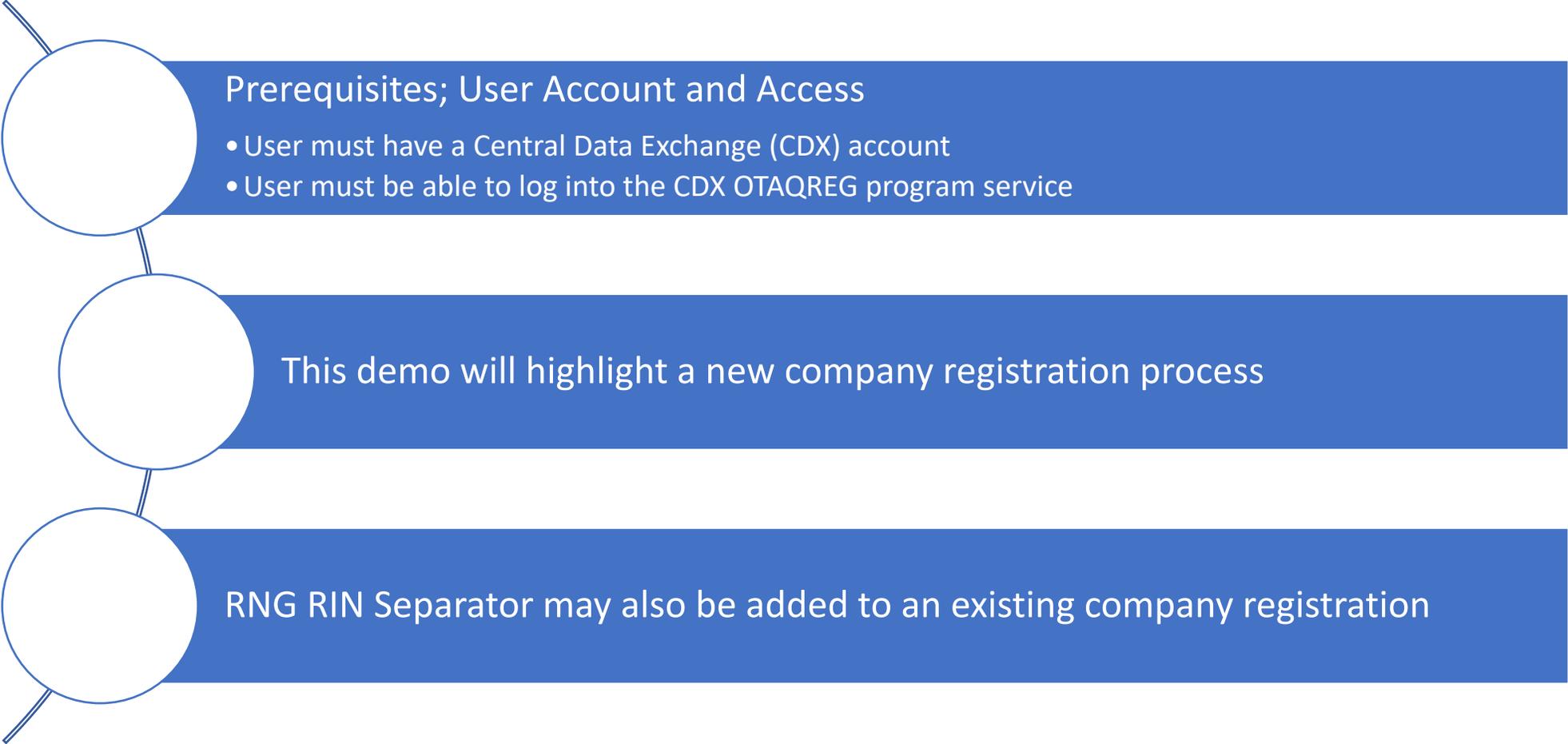
Notes on registering users:

- 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"



Demonstration: RNG RIN Separator

RNG RIN Separator



Prerequisites; User Account and Access

- User must have a Central Data Exchange (CDX) account
- User must be able to log into the CDX OTAQREG program service

This demo will highlight a new company registration process

RNG RIN Separator may also be added to an existing company registration

RNG RIN Separator; Create New Company

 OTAQ Registration [Home](#) **1** [Create New Company](#) [Associate To Existing Company](#) Welcome to OTAQReg, 

Company Name and Location

2

Company Name:

Street Address:

Street Address (Line 2):

City: **State/Province:**

Postal Code: **Country:**

3

RNG RIN Separator; Review Company Information and Identify the Responsible Corporate Officer

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.

4

Company Name *
RNG RIN Separator

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.

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

RCO CDX User ID: USER_NAME **RCO Name:** Jan Smith

6 **RCO Title: *** Title **RCO Phone:** (703) 123-4567

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

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

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

7 **10**

RNG RIN Separator; Program Type and Business Activities Information

Program Type and Business Activities

11

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? *

Yes No

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

Program Type and Business Activities

12

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? *

Yes No

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

Except for independent third parties under RFS QAP, do you need to register under the Renewable Fuel Standard Program? *

Yes No

RNG RIN Separator; Program Type and Business Activities Information

Program Type and Business Activities

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? Yes No

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

13 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

14 Except for independent third parties under RFS QAP, do you need to register under the Renewable Fuel Standard Program? Yes No

Business Activities For *Renewable Fuel Standard* Program Type

Biogas Producer ⓘ	<input type="checkbox"/> No
Biointermediate Producer ⓘ	<input type="checkbox"/> No
Feedstock Aggregator ⓘ	<input type="checkbox"/> No
Foreign Undenatured Ethanol Producer ⓘ	<input type="checkbox"/> No
PADD Importer (Renewable Fuel Importer) ⓘ	<input type="checkbox"/> No
Renewable Fuel Producer ⓘ	<input type="checkbox"/> No
Renewable Fuels Exporter ⓘ	<input type="checkbox"/> No
Renewable Fuels Importer ⓘ	<input type="checkbox"/> No
RFS Pathway Petition Submitter (80.1416) ⓘ	<input type="checkbox"/> No
RIN Owner Only (Blenders, Marketers, Traders) ⓘ	<input type="checkbox"/> No
15 RNG RIN Separator ⓘ	<input checked="" type="checkbox"/> Yes
Small Blender (Blenders in 40 CFR 80.1440) ⓘ	<input type="checkbox"/> No

◀ Back

Save

16

Save & Continue ▶

RNG RIN Separator; Attest Submission Information

Attest Submission Information

What To Do

Under the gasoline and diesel programs, gasoline manufacturers (e.g., gasoline refiners, gasoline blending manufacturers, and gasoline importers) must arrange for the submission of an annual attest audit report under 40 CFR 1090.1800. Under the RFS program, obligated parties, renewable fuel producers (including all parties allowed to generate RINs under 40 CFR part 80), renewable fuel importers, biointermediate producers, independent third-party auditors, biogas producers, RNG producers, RIN owners, and RNG RIN separators must arrange for the submission of an attest audit report under 40 CFR 80.165, 80.1464, and 80.1475, as applicable.

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

18

RNG RIN Separator; Adding RNG RIN Separator Facility Information

RNG RIN Separator Information

Pipeline Information

RNG Withdrawal Point(s)

19a Add RNG Withdrawal Point

CNG/LNG Dispensing Station(s)

19b Add CNG/LNG Dispensing Station

RNG Withdrawal Point(s)

20 Select Facility

Location Name: Location FRS ID: Remove

Add RNG Withdrawal Point

CNG/LNG Dispensing Station(s)

20 Select Facility

Location Name: Location FRS ID: Remove

Add CNG/LNG Dispensing Station

RNG RIN Separator; Adding RNG RIN Separator Facility Information

Add Facility

Add Facility

Find Existing Facility

Please note, the Facility ID criterion searches against FRS Facility IDs. Do not use OTAQReg 5-digit reporting IDs in this field.

For best results, please fill in at least two search criteria.

Facility ID

Facility Name

Facility Country

Facility Address

City

State

County

ZIP Code

Add Facility

Add Facility

Facility Search Results (1 facility found) [List View](#) | [Map View](#)

Search Criteria: UNITED STATES OF AMERICA | 123 MAIN ST, FAIRFAX, VA 22030

Filter:

EPA Registry ID	Facility Name	Facility Address	EPA Programs Reporting	Alternate EPA Registry IDs/Program IDs
999983156478	RNG RIN Separator Facility	123 Main St. Fairfax, VA 22030	OTAQREG	OTAQREG10012345

Showing 1 to 1 of 1 facilities

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

Previous Next

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:

EPA Registry ID	Program ID	Facility Name	Facility Address	
999983156478	OTAQREG10012345	RNG RIN Separator Facility	123 MAIN ST. FAIRFAX, VA 22030	View/Edit Details Remove

Showing 1 to 1 of 1 facilities

Previous Next

RNG RIN Separator; Adding RNG RIN Separator Facility Information

Add Facility ×

Add Facility

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

Search Criteria: 22030 | Fairfax 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](#)

26

RNG RIN Separator; Adding RNG RIN Separator Facility Information

Add Facility ✕

Add Facility

Create Facility

[< Back to Search Results](#)

27

Facility Name
RNG RIN Separator Facility

Facility Address
UNITED STATES OF AMERICA
123 Main St.
Address 2
Fairfax_ VA 22030
Fairfax County

Coordinates
Latitude
Longitude

28

Is Mailing Address Same as Facility Address?
 Yes No

29

Map Facility

30

Submit



[Map Legend](#)

RNG RIN Separator; Adding RNG RIN Separator Facility Information

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	RNG RIN Separator Facility	123 Main St. Fairfax, VA 22030	View/Edit Details Remove

Showing 1 to 1 of 1 facilities Previous 1 Next

31 Save Selected Facility

RNG RIN Separator; Adding RNG RIN Separator Facility Information

RNG RIN Separator Information

Pipeline Information

RNG Withdrawal Point(s)

<input type="button" value="Select Facility"/>	Location Name: NORTH WITHDRAWAL POINT	Location FRS ID: 110020178895	<input type="button" value="Remove"/>
--	--	-------------------------------	---------------------------------------

CNG/LNG Dispensing Station(s)

<input type="button" value="Select Facility"/>	Location Name: NORTH DISPENSING STATION	Location FRS ID: PENDING	<input type="button" value="Remove"/>
--	--	--------------------------	---------------------------------------

RNG RIN Separator; Part 79 Company Information and User Role Associations

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.

33

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

⏪ Back

Save

34

Save & Continue ⏩

Additional Company/User Role Associations

35

Will you be viewing RFS transactions (e.g., for RINs or biogas tokens) via the EMTS application?

Yes

Will you ALSO be SUBMITTING RFS transactions via the EMTS application?

Yes

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](#).

Yes

⏪ Back

Save

36

Save & Continue ⏩

RNG RIN Separator; Review and Submit Request

37

Company Request

Request Information

Request ID: COM-27299	Created On: 02/12/2024
Request Type: New Company	Modified On: 02/12/2024
Request Status: Draft	Requestor ID: USER_NAME
Company Name: RNG RIN Separator [1997]	Requestor Name:
Submission: Initial	

Program Types and Business Activities

Renewable Fuel Standard
RNG RIN Separator

Attest Submission Information

Is this company required to submit one or more annual attest audit reports? Yes

RNG RIN Separator Information

RNG Withdrawal Point(s)

Location Name: NORTH WITHDRAWAL POINT	Location FRS ID: 110020178895
---------------------------------------	-------------------------------

CNG/LNG Dispensing Station(s)

Location Name: NORTH DISPENSING STATION	Location FRS ID: PENDING
---	--------------------------

Home Page

Back

Cancel Request

38

Sign and Submit

39

Submit and Notify RCO

RNG RIN Separator; Adding RNG RIN Separator Facility Information

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.

40

41 eSignature Widget

1. Authentication
Log into CDX
User:
USER_NAME
Password:
.....
 Show Password

2. Verification
Question:
What is your favorite movie?
Answer:

 Show Answer
Correct Answer

3. Sign File

My Requests

Pending Withdrawn Rejected

Show 10 entries Search: 27299

Request ID	Request Type	Request Subject	Submitted By	Date Last Updated	Status
COM-27299	New Company	RNG RIN Separator - 1997	USER_NAME	02/13/2024	Awaiting Initial Review

Showing 1 to 1 of 1 entries (filtered from 13 total entries)

Previous 1 Next



Demonstration: Biogas Producer

Update Company and Add Facility

Biogas Producer Prerequisites

Prerequisites; User Account and Access

- User must have a Central Data Exchange (CDX) account
- User must be able to log into the CDX OTAQREG program service
- User must have a registered company in OTAQREG with the Initial Registration Submissions business activity
- User must have the following role in OTAQREG on behalf of the registered company
 - Company Editor or RCO

Biogas Producer; Update Company Program Type

My Companies

Show 10 entries Filter Companies:

Company ID	Company Name	Address	My Roles
1996	Biogas Producer	123 Main St. Fairfax, VA 22030, US	<ul style="list-style-type: none">EMTS RFS ViewerCompany EditorRCO

Previous 1 Next

- View Company Information
- Edit Roles
- Manage User Associations
- Edit Company Information
- Edit Program Types and Activities
- Manage Facilities
- QAP Associations
- Manage Reports
- RCO Update Request

Biogas Producer; Program Type and Business Activities Information

Program Type and Business Activities

3

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? *

Yes No

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

Except for independent third parties under RFS QAP, do you need to register under the Renewable Fuel Standard Program? *

Yes No

Biogas Producer; Program Type and Business Activities Information

Program Type and Business Activities

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? *

Yes No

4

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

Except for independent third parties under RFS QAP, do you need to register under the Renewable Fuel Standard Program? *

Yes No

Biogas Producer; Program Type and Business Activities Information

Program Type and Business Activities

Are you required to submit documents via DCFuels (e.g., an Engineering Review (ER)) in order to register your company activities and you have not had your company activated? Yes No

Are you an independent third party that will conduct audits of renewable fuel production under the RFS 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

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

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

6 Except for independent third parties under RFS QAP, do you need to register under the Renewable Fuel Standard Program? Yes No

Business Activities For *Renewable Fuel Standard* Program Type

7 Biogas Producer Yes

Biointermediate Producer No

Feedstock Aggregator No

Foreign Udenatured Ethanol Producer No

PADD Importer (Renewable Fuel Importer) No

Renewable Fuel Producer No

Renewable Fuels Exporter No

Renewable Fuels Importer No

RFS Pathway Petition Submitter (80.1416) No

RIN Owner Only (Blenders, Marketers, Traders) No

RNG RIN Separator No

Small Blender (Blenders in 40 CFR 80.1440) No

Biogas Producer; Attest Submission and Part 79 Company Information

Attest Submission Information

What To Do

Under the gasoline and diesel programs, gasoline manufacturers (e.g., gasoline refiners, gasoline blending manufacturers, and gasoline importers) must arrange for the submission of an annual attest audit report under 40 CFR 1090.1800. Under the RFS program, obligated parties, renewable fuel producers (including all parties allowed to generate RINs under 40 CFR part 80), renewable fuel importers, biointermediate producers, independent third-party auditors, biogas producers, RNG producers, RIN owners, and RNG RIN separators must arrange for the submission of an attest audit report under 40 CFR 80.165, 80.1464, and 80.1475, as applicable.

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

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

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.

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

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

Biogas Producer; Facility Registrations – Adding a Facility

Facility Registrations

Show entries

Filter Facilities

13 [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 ⏩](#)

Biogas Producer; Facility Registrations – Adding a Facility

Add Facility

Add Facility

Find Existing Facility

Please note, the Facility ID criterion searches against FRS Facility IDs. Do not use OTAQReg 5-digit reporting IDs in this field.

For best results, please fill in at least 90 search criteria.

Facility ID 14

Facility Name

Facility Country UNITED STATES OF AMERICA

Facility Address 123 MAIN ST

City FAIRFAX

State Virginia

County -Select a County-

ZIP Code

15 **Search Facilities**

Add Facility

Add Facility

Facility Search Results (1 facility found) [List View](#) | [Map View](#)

Search Criteria: UNITED STATES OF AMERICA | 7145 OLD MT HOLLY, CHARLOTTE, NC 28214 Change

Filter:

EPA Registry ID	Facility Name	Facility Address	EPA Programs Reporting	Alternate EPA Registry IDs/Program IDs
16 999983156478	BIOGAS PRODUCER FACILITY	123 MAIN ST FAIRFAX, VA 22030	OTAQREG	OTAQREG10012345

17 Showing 1 to 1 of 1 facilities

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

Previous Next

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:

EPA Registry ID	Program ID	Facility Name	Facility Address	
999983156478	OTAQREG10012345	BIOGAS PRODUCER FACILITY	123 MAIN ST FAIRFAX, VA 22030	View/Edit Details Remove

18 Showing 1 to 1 of 1 facilities

Save Selected Facility Previous Next

Biogas Producer; Facility Registrations – Adding a Facility

Add Facility ×

Add Facility

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

Search Criteria: 22030 | Fairfax 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](#)

19

Biogas Producer; Facility Registrations – Adding a Facility

Add Facility×

Add Facility

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

20 **Facility Name**
Biogas Producer Facility

Facility Address
UNITED STATES OF AMERICA
123 Main St.
Address 2
Fairfax VA 22030
Fairfax County

Coordinates
Latitude
Longitude

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

22 **Map Facility**

23 **Submit**



Map Legend

Biogas Producer; Facility Registrations – Adding a Facility

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	Biogas Producer Facility	123 Main St. Fairfax, VA 22030	View/Edit Details Remove

Showing 1 to 1 of 1 facilities

Previous1Next

Save Selected Facility

24

Biogas Producer; Facility Registrations – Adding a Facility

Facility Program Types and Activities

27 Does this facility produce a biogas feedstock that will be used to produce a renewable fuel, renewable electricity, or a biointermediate product? * Yes No

Business Activities For *Biogas Producer* Program Type

28 Biogas Producer ? Yes

◀ Back Save **29** Save & Continue ▶

Facility Record Storage

Are facility records stored on-site, off-site, or both as defined in 1090.805?

Please choose at least one storage method

30 On-Site? No

Off-Site? No

◀ Back Save **31** Save & Continue ▶

Biogas Producer; Facility Registrations – Adding a Facility

Biogas Producer Information

32

Biogas Source Information

Will any biogas from this site be produced from a landfill? No

Will any biogas from this site be produced from a municipal wastewater treatment plant digester? No

Will any biogas from this site be produced from an agricultural digester? No

Will any biogas from this site be produced from a separated MSW digester? No

Will any biogas from this site be produced from other waste digester not listed above? No

Biogas Feedstock Information

33

Feedstock Codes: *

Select Feedstock Codes...

Biogas Producer; Facility Registrations – Adding a Facility

Capacity Information

If data is unavailable for a given year, enter 0 for the capacity value.

	Total Volume (MMscf)	Total Capacity (MMBtu)	Start Date	End Date	Actions
34 Nameplate Capacity	<input type="text" value="10000"/>	<input type="text" value="10000"/>			Clear
Historical Capacity (Current Year)	<input type="text" value="10000"/>	<input type="text" value="10000"/>	<input type="text" value="02/01/2023"/>	<input type="text" value="03/01/2023"/>	Clear
Historical Capacity (1 Year Prior)	<input type="text" value="10000"/>	<input type="text" value="10000"/>	<input type="text" value="02/01/2022"/>	<input type="text" value="04/04/2022"/>	Clear
Historical Capacity (2 Years Prior)	<input type="text" value="10000"/>	<input type="text" value="10000"/>	<input type="text" value="02/01/2021"/>	<input type="text" value="02/01/2021"/>	Clear

35 Do you have a permitted capacity? Yes

36 Permitted Capacity: * Million BTU for Higher Heating Value (MMBTU-HHV)

37

Biogas Producer; Facility Registrations – Adding a Facility

Facility Registrations

Show entries

ID	Name	Type	Status	Location	Actions
OTAQREG10012345	Biogas Producer Facility	• Biogas Producer	New	123 Main St. Fairfax, VA 22030	View Edit Delete

Showing 1 to 1 of 1 entries

38

Biogas Producer; Review and Submit Request

Company Program Type Request

Request Information

Request ID: CPT-34925	Created On: 03/15/2024
Request Type: Update Company Program Type	Modified On: 03/15/2024
Request Status: Draft	Requestor ID: RCOLINDA
Company Name: Biogas Producer [1996]	Requestor Name: Jane Smith
Submission: Initial	

Requested Changes

Biogas Producer Facility (OTAQREG10012345) is being added
Company Activity Biogas Producer(311) changed from false to true
Company Activity Initial Registration Submissions(9) changed from true to false
Company Attest Submission Requirement changed from null to true
Company Program Type Initial Registration Submissions changed from true to false
Company Program Type Renewable Fuel Standard changed from false to true

Reason for Change: *

39

- New Facility (with Engineering Review)
- Facility ownership change (new Engineering Review)
- Facility ownership change (carry over Engineering Review)
- Three Year Update Engineering Review
- Facility Update (with Engineering Review)
- Other (No Engineering Review)

Biogas Producer; Review and Submit Request

Company Program Type Request

40

Request Information

Request ID: CPT-34925	Created On: 03/15/2024
Request Type: Update Company Program Type	Modified On: 03/15/2024
Request Status: Draft	Requestor ID: USER_NAME
Company Name: Biogas Producer [1996]	Requestor Name: Jane Smith
Submission: Initial	

Requested Changes

Biogas Producer Facility (OTAQREG10012345) is being added
Company Activity Biogas Producer(311) changed from false to true
Company Activity Initial Registration Submissions(9) changed from true to false
Company Attest Submission Requirement changed from null to true
Company Program Type Initial Registration Submissions changed from true to false
Company Program Type Renewable Fuel Standard changed from false to true

Reason for Change: *

Requested Company Details

Company ID: 1996	City: Fairfax
Company Name: Biogas Producer	State: VA
Street Address: 123 Main St	Postal Code: 22030
Street Address 2:	Country: US

Home Page

Back

Cancel Request

41
Sign and Submit

42
Submit and Notify RCO

Biogas Producer; Review and Submit Request

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.

43

Accept Decline

44

eSignature Widget

1. Authentication

Log into CDX
User: _____
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: 1996

Request ID	Request Type	Request Subject	Submitted By	Date Last Updated	Status
CPT-34925	Company Program Update	Biogas Producer - 1996	USER_NAME	02/12/2024	Awaiting Initial Review

Showing 1 to 1 of 1 entries (filtered from 12 total entries)

Previous 1 Next

45



Demonstration: Biogas Producer

Associating with a Renewable Fuel Producer

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

My Companies

Show entries Filter Companies:

Company ID	Company Name	Address	My Roles
1996	Biogas Producer	123 Main St, Fairfax, VA 22030, US	<ul style="list-style-type: none">EMTS RFS SubmitterPart 80/1090 Report SubmitterCompany Editor

Navigation: Previous | 1 | Next

Search:

1 View Company Information
Edit Roles
Edit Company Information
S Edit Program Types and Activities
Manage Facilities
QAP Associations
2 Manage Biogas Producer Associations
RCO Update Request
Manage ER Submissions
Manage Attest Submissions
Manage Reports

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Manage Biogas Producer Associations for Biogas Producer [1996]

3 [Create New Association](#)

Show entries

Producer Facility (ID)	Associated Company (ID)	Associated Facility (ID)	Start Date	End Date	Fuel Type Code	Biogas Usage	Association Type	Actions
Showing 1 to 1 of 1 entries								

Previous **1** Next

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Biogas Producer Association Information

Biogas Association Type Information

4 Association Type *
Renewable Fuel Producer (RFP)

Fuel Type Code Information

5 Fuel Type Code *

Biogas Usage Information

6 Usage Type *

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Biogas Producer Information

Company Details

Company ID: 1996	City: Fairfax
Company Name: Biogas Producer	State: VA
Street Address: 123 Main St	Postal Code: 22030
Street Address 2:	Country: US

Responsible Corporate Officer (RCO) Information

RCO CDX User ID: USER_NAME_01	RCO Phone: (703) 123-4567
RCO Name: Jan Smith	RCO Fax:
RCO Title: COO	RCO Email: Jan.Smith@company.com

7 **Producer Facility ***

BIOGAS PRODUCER FACILITY

8 **Select Consumer Company**

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

OT/AC Registration Home Create New Company Associate to Existing Company Welcome to OI

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

9

Company ID:

Company Name

Street Address:

Street Address (Line 2):

City: State/Province:

Postal Code: Country:

10

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Search Results

Search Results

Show entries Filter Companies

Company Id	Company Name	Address	Actions
1601	Renewable Fuel Producer - Test	123 Main St Fairfax, VA 22030	11 Select

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

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Biogas Consumer Information

Select Consumer Company

Company Details

Company ID: 1601	City: Fairfax
Company Name: Renewable Fuel Producer - Test	State: VA
Street Address: 123 Main St	Postal Code: 22030
Street Address 2:	Country: US

Responsible Corporate Officer (RCO) Information

RCO CDX User ID: USER_NAME	RCO Phone: (703) 123-4567
RCO Name: John Smith	RCO Fax:
RCO Title: title	RCO Email: John.Smith@company.com

12 Consumer Facility *

RENEWABLE FUEL PRODUCER FACILITY

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

Association Dates

Start Date * 11/01/2023

End Date 11/30/2023

Note: A red box highlights the date input fields, and a red circle with the number 13 is positioned above the Start Date field.

14

Back Save and Continue

Note: A red box highlights the 'Save and Continue' button, and a red circle with the number 14 is positioned above it.

Biogas Producer; How to Associate your Biogas Producer with a Renewable Fuel Producer

15

Biogas Producer Association Request

Request Information

Request ID: BIOGAS-27346	Created On: 02/21/2024
Request Type: New Biogas Producer Association	Modified On: 02/21/2024
Request Status: Draft	Requestor ID: USER_NAME
Company Name: Biogas Producer [1996]	Requestor Name: Jan Smith
Submission: Initial	

16

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

17

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



Demonstration: Biogas Producer

Associating with a QAP Provider

Biogas Producer; How to Associate with a QAP Provider

The screenshot displays the 'My Companies' interface. At the top, there is a header 'My Companies' and a filter box containing 'biogas'. Below the header, there is a 'Show 10 entries' dropdown and a table with columns: 'Company ID', 'Company Name', 'Address', and 'My Roles'. The first row shows a company with ID '1996', name 'Biogas Producer', and address '123 Main St, Fairfax, VA 22030, US'. The 'My Roles' column lists: RCO, EMTS RFS Submitter, Part 80/1090 Report Submitter, and Company Editor. A dropdown menu is open for the 'Company ID' '1996', with 'Manage Biogas Producer Associations' highlighted. Other menu items include 'View Company Information', 'Edit Roles', 'Manage User Associations', 'Edit Company Information', 'Edit Program Types and Activities', 'Manage Facilities', 'QAP Associations', 'RCO Update Request', 'Manage ER Submissions', 'Manage Attest Submissions', and 'Manage Reports'. A 'Search:' box is at the bottom right.

Company ID	Company Name	Address	My Roles
1996	Biogas Producer	123 Main St, Fairfax, VA 22030, US	<ul style="list-style-type: none">RCOEMTS RFS SubmitterPart 80/1090 Report SubmitterCompany Editor

Biogas Producer; How to Associate with a QAP Provider

Manage Biogas Producer Associations for Biogas Producer [1996]

3 **Create New Association**

Show 10 entries Filter associations

Producer Facility (ID)	Associated Company (ID)	Associated Facility (ID)	Start Date	End Date	Fuel Type Code	Biogas Usage	Association Type	Actions
There are no Associations to display.								

Showing 0 to 0 of 0 entries Previous Next

Biogas Producer Association Information

Biogas Association Type Information

4 **Association Type ***
QAP Provider (QAP)

Fuel Type Code Information

5 **Fuel Type Code ***

Biogas Producer; How to Associate with a QAP Provider

Biogas Producer Information

Company Details

Company ID: 1996	City: Fairfax
Company Name: Biogas Producer	State: VA
Street Address: 123 Main St	Postal Code: 22030
Street Address 2:	Country: US

Responsible Corporate Officer (RCO) Information

RCO CDX User ID: USER_NAME	RCO Phone: (703) 870-8929
RCO Name: Jan Smith	RCO Fax:
RCO Title: Role Title	RCO Email: Jan.Smith@company.com

6 **Producer Facility ***

BIOGAS PRODUCER FACILITY

Biogas Producer; How to Associate with a QAP Provider

QAP Company Information

7

QAP Company *

QAP Company 2 (1969) x

Association Dates

8

Start Date *

02/01/2024

End Date

10/01/2024

9

Back Save and Continue

Biogas Producer; How to Associate with a QAP Provider

10

Biogas Producer Association Request

Request Information

Request ID: BIOGAS-27311	Created On: 02/13/2024
Request Type: New Biogas Producer Association	Modified On: 02/13/2024
Request Status: Draft	Requestor ID: USER_NAME
Company Name: Biogas Producer [1996]	Requestor Name: John Smith
Submission: Initial	

Biogas Producer Information

Company Details

Company ID: 1996	City: Fairfax
Company Name: Biogas Producer	State: VA
Street Address: 123 Main St	Postal Code: 22030
Street Address 2:	Country: US

Responsible Corporate Officer (RCO) Information

RCO CDX User ID: USER_NAME	RCO Phone: 703-123-4567
RCO Name: Jan Smith	RCO Fax:
RCO Title: Role Title	RCO Email: Jan_Smith@company.com

11

Home Page Back Cancel Request Submit and Notify Associate

12

Home Page Back Cancel Request Submit and Notify RCO

Biogas Producer; How to Associate with a QAP Provider

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.



14 eSignature Widget

1. Authentication
Log into CDX
User:
USER_NAME
Password:
.....
Show Password
Welcome John Smith

2. Verification
Question:
What is the first and middle name of your oldest sibling?
Answer:
.....
Show Answer
Correct Answer

3. Sign File
Sign

15

Request ID	Request Type	Request Subject	Submitted By	Date Last Updated	Status
BIOGAS-27311	New Biogas Producer Association	Biogas Producer - 1996	USER_NAME	02/13/2024	Awaiting RCO Approval

Showing 1 to 1 of 1 entries (filtered from 12 total entries)

Take a break and
caffeinate!

Return at 1:45 pm EDT

Send questions to
FuelsProgramSupport@epa.gov





Biogas Registrations *Forms and Policies*

Robert Anderson

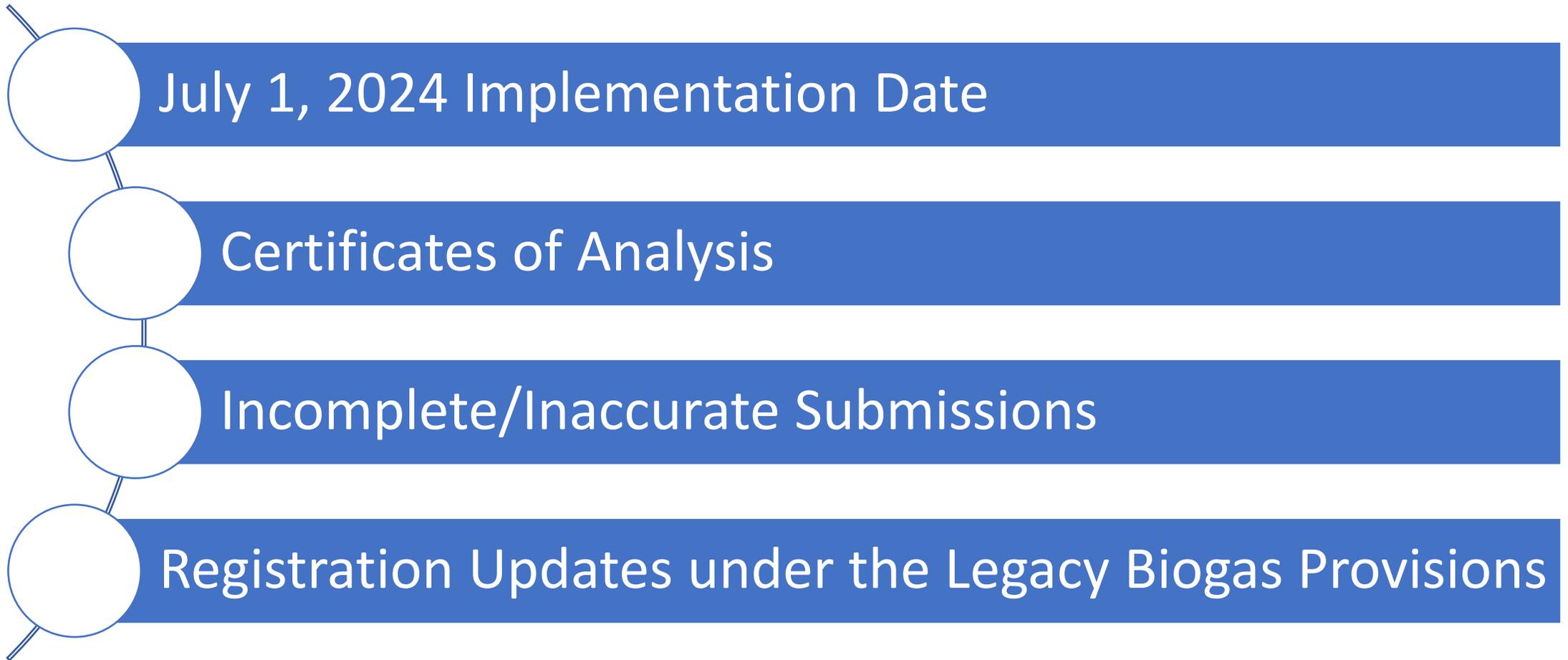
Office of Transportation and Air Quality

April 12, 2024

Overview

- Purpose
 - Provide an overview of EPA registration requirements and procedures for registering under the new and legacy biogas provisions.
- Three Sections:
 - Registration under the legacy biogas provisions
 - Managing registrations under the transition from the legacy to the new biogas provisions
 - Registration under the new biogas provisions

1. Registration under the Legacy Biogas Provisions



July 1, 2024 Implementation Date

- Based on discussion with stakeholders, EPA anticipates an influx of registration submissions under the legacy biogas provisions between now and July 1, 2024.
- Several stakeholders have asked whether EPA will accept a registration submission under the legacy biogas provisions after the July 1, 2024 implementation date.
- The regulations at 40 CFR 80.105(d)(2) state:
 - “Parties not registered to generate RINs under [§ 80.1426\(f\)\(10\)\(ii\)](#) or [\(11\)\(ii\)](#) prior to July 1, 2024, must register with EPA under [§ 80.135](#). EPA will not accept registration submissions for the generation of RINs under [§ 80.1426\(f\)\(10\)\(ii\)](#) and [\(11\)\(ii\)](#) on or after July 1, 2024.”
- This means that parties must have their registrations submitted and accepted by EPA by July 1, 2024.

Certificates of Analysis (COA)

- A number of stakeholders have asked if EPA would consider reviewing or accepting a registration under the legacy biogas provisions without a COA as stated in the 2016 Biogas Guidance.
- EPA does not intend to accept (see 40 CFR 80.1450) a biogas registration under the legacy biogas provisions without a COA, and COAs must be submitted by July 1, 2024.
- However, to facilitate timely review of registration submissions, parties may submit a registration submission without a COA for preliminary review. EPA intends to prioritize the review of completed submissions (e.g., those with a COA) over submissions without a COA.
- All submitters of new facilities under the legacy biogas provisions should send an email to FuelsProgramSupport@epa.gov with the registration request ID number (e.g. FAC-XXXXX, CPT-XXXXX) and a message saying either 1) COAs are included, or 2) no COAs are included. If COAs are not included, they should reply to the same JSDEP ticket after COAs are submitted and indicate the DCFUEL Submission ID.

Incomplete/Inaccurate Submissions

- Due to the anticipated influx of submissions under the legacy biogas provisions, to ensure timely processing, as soon as EPA identifies the first deficiency in the submission, EPA intends to notify the requestor and push back the request.
- In order to provide equitable and efficient processing, a party's resubmission will go to the end of the queue after they resubmit.
- This approach will allow EPA an opportunity to review all timely submissions on a first in/first out basis.

Registration Updates under Legacy Biogas Provisions

- Some stakeholders have asked for clarification over whether/how to maintain registrations under the legacy biogas provisions.
- Parties that are registered under the legacy biogas provisions are required to maintain their registrations until the new biogas provisions come into effect (i.e., until January 1, 2025).
- The timeline for registration updates depends on the type of update being made and are specified at 40 CFR 80.1450(d).

2. Transition Period from Legacy to New Provisions - Overview

Simultaneous registration

- New facilities
- Existing facilities

Registration Prioritization Summary

Simultaneous Registration – New Facilities

- Several stakeholders asked whether they can simultaneously register a new facility under both the legacy and new biogas provisions at the same time.
- Short answer: Yes. The regulations do not preclude a party from registering under both the legacy and new biogas provisions at the same time.
- However, it may make sense to first submit under the legacy biogas provisions.
 - Because EPA can only activate a registration request in its entirety, any issue with the submission under the new biogas provisions will delay registration under the legacy biogas provisions, even if everything in the submission is correct under the legacy biogas provisions.
 - For this reason, we recommend registering under the legacy biogas provisions first and then to register under the new biogas provisions in a separate submission.

Simultaneous Registration – Existing Facilities

- Some stakeholders have asked whether they can update their registrations for existing facilities to comport with the new biogas provisions prior to the January 1, 2025 implementation date for existing facilities.
- Again, short answer: Yes.
- However, to ensure that we appropriately address timely submissions under the legacy biogas provisions, EPA intends to temporarily prioritize unregistered biogas-related facilities over previously-registered biogas facilities attempting to register under the program.

Registration Prioritization Summary

- EPA still intends to prioritize registration submissions in the order that they are received.
 - I.e., EPA is not going to prioritize biogas submissions over other submissions.
- However, due to the anticipated influx of submissions under the legacy biogas provisions and to ensure timely processing of those submissions, EPA will temporarily prioritize certain biogas submissions over other biogas submissions due to the July 1, 2024 implementation date.
- Within the biogas queue, EPA will prioritize registration submissions as follows:
 - New facilities under legacy biogas provisions
 - New facilities under new biogas provisions
 - Previously registered facilities updating for new biogas provisions
- Routine registration updates (e.g., an RCO update) for previously registered biogas facilities will be processed in the order that they are received.

3. Registration under New Biogas Provisions

Biogas/RNG production facility capacities

October 1, 2024 submission date

October 1, 2024 registration updates and three-year registration updates

Biogas producer process heat supply plans

RNG RIN separators

- Registering at the same withdrawal point
- Registering at the same dispensing location

Biogas/RNG Production Facility Capacities

- BRRR standardized how biogas and RNG production facilities report capacities.
 - As specified at 40 CFR 80.135(c)(1)(ii) and (d)(1)(ii), all biogas or RNG production facilities, respectively, must include a nameplate capacity (in mmBtu).
 - If available, a facility must report their last three years of production (in mmBtu). The most recent year may be a partial year.
 - Also if available, a facility must submit a permitted capacity in the units specified in the permit.
- One key area for clarification is for the registration of pathways for RNG production facilities.
 - To assist EPA in the timely review of RNG production facilities, RNG producers should only use nameplate capacity (in gallons) for all pathways under the new biogas provisions.
 - Do NOT use contracted capacity for registrations under the new biogas provisions. Contracted capacity ONLY applies to biogas registration under the legacy biogas provisions.
 - OTAQReg will allow RNG producers to input other capacity types, but EPA will push back the registration if anything other than nameplate capacity is included.

Biogas/RNG Production Facility Capacities (cont.)

- Another area to highlight for the new biogas provisions is how permitted capacity is submitted under 40 CFR 80.135 vs under 40 CFR 80.1450.
- Under 40 CFR 80.1450(b)(1)(v)(A), renewable fuel production facilities must submit copies of their latest air permits.
- Under 40 CFR 80.135, biogas and RNG production facilities must provide EPA with information regarding the permitted capacity, if available, but **DO NOT** need to provide EPA with a copy of the permit.
 - The facility should include information regarding the permit as part of their registration submission.
 - Such information would include the permitting authority and associated permit number(s).
 - Also note, under 80.145(a)(1)(ii)(B), copies of the air permits, if available, must be kept as records because such permits would be underlying information and documentation used to prepare and submit the registration request.

October 1, 2024 Submission Date

- Stakeholders have asked whether the registration updates for facilities registered under the legacy biogas provisions need to be submitted to the EPA by Oct 1 for approval by January 1, 2025.
- The regulations at 40 CFR 80.135(b) require the submission of registration updates to comport with the new biogas provisions by October 1, 2024.
- EPA intends to act on all **complete and accurate** registration updates submitted by the October 1, 2024 submission date, by January 1, 2025.
- EPA will endeavor to review all submissions prior to January 1, 2025. However, due to the anticipated influx of timely submissions, EPA cannot guarantee acceptance of submissions received after October 1, 2024 by January 1, 2025.

October 1, 2024 Registration Updates and Three-year Registration Update

- For facilities submitting registration updates under the new biogas provisions for the October 1, 2024 submission date, stakeholders have asked whether these registration updates will count as initial registrations or whether the due date for the next three-year registration update remains the same.
- It depends.
 - For RNG production facilities, EPA will treat these submissions as initial registrations because a new ER is required for all RNG production facilities.
 - For biogas producers and BCDS RIN generators:
 - If the registration submission meets all applicable regulatory requirements to satisfy the previously registered facility's three-year update (e.g., new ER with site visit and VRIN verification, as applicable), the cohort for that facility resets as described at 40 CFR 80.1450(d).
 - If a registration submission is submitted without a new ER, as allowed under 40 CFR 80.135(b)(2)(ii), or does not meet the applicable regulatory requirements for a three-year update, then the cohort for that facility remains the same.

Biogas Producer Process Heat Supply Plans

- Some biogas producers have asked whether they must submit process heat supply plans as part of their registration submissions under the new biogas provisions.
- Unless the facility is operating under a facility-specific pathway under 40 CFR 80.1416 that requires a process heat supply plan, biogas producers do not need to supply one as part of registration under 40 CFR 80.135.
- It's worth noting, biogas producers may need to provide QAP auditors process heat information as part of QAP verification.

RNG RIN Separators

- Several stakeholders have asked whether more than one RNG RIN separator can register at the same withdrawal point or dispenser location.
- EPA has designed its OTAQReg system to be consistent with the regulations.
 - The regulations do not prohibit more than one RNG RIN separator from having the same withdrawal point, so the system will allow multiple parties to register for the same withdrawal point.
 - However, the regulations at 40 CFR 80.115(b)(2) state that “[a] dispensing location may only be included in one RNG RIN separator's registration at a time.” As such, the system will not allow more than one RNG RIN separator to register for the same dispensing location at the same time.



BRRR Question and Answer

Robert Anderson

Office of Transportation and Air Quality

April 12, 2024

Webinar Slides

- Will EPA post the webinar slides, and if so when?
 - EPA intends to post the webinar slides next week on the Set Rule Implementation Webinars webpage, available here:
<https://www.epa.gov/renewable-fuel-standard-program/rfs-set-rule-implementation-webinars>.

Participant Roles

- Can the same entity serve as the Biogas Producer, RNG Producer and/or RNG RIN Separator?
 - Relevant regulations: 40 CFR 80.2 (definitions of “biogas producer,” “RNG producer,” and “RNG RIN separator”)
- If a party serves in multiple roles, are any of the reporting/compliance requirements consolidated to avoid duplication?
 - Relevant regulations: 40 CFR 80.135, 40 CFR 80.150, 40 CFR 80.1453, and 40 CFR 80.1453

Participant Roles

- Can parties that are now required to register (landfills, transportation end users etc.) appoint a 3rd party as an agent to do make all the necessary filings? If yes, can it appoint a RNG producer as its “agent”?
 - Relevant regulations: 40 CFR 80.135, 80.140, 80.1450, 80.1451, 1090.800, 1090.805
- Do new parties to the registration process have to designate Responsible Corporate Officers? What are the duties of the RCO for the new parties?
 - Relevant regulations:, 40 CFR 80.135, 1090.80 (definition of “RCO”), 1090.800, 1090.805
- Can EPA provide training materials or support for registration and reporting requirements for these new parties?
 - EPA publishes job aids that include step-by-step instructions how to prepare, submit, and sign registration and reporting submissions.
 - These job aids are available on EPA’s website at: <https://www.epa.gov/fuels-registration-reporting-and-compliance-help/job-aids-biogas-registration>.

Participant Roles

- Among those parties that can separate RNG RINs under Section 80.125(d) is the “party that produced or oversaw the production of the renewable CNG/LNG from the RNG.” Section 80.125(d)(2)(ii)(B) appears to contemplate that the RNG RIN separator can rely “on documentation from another party[...].” As such, we read the regulations as not requiring the RIN separator to be the owner/operator of the CNG/LNG production equipment but can be a party that evidences RIN separator status and fulfillment of requirements for RIN separation through the collection of documentation from the appropriate parties. Can EPA confirm that this understanding is consistent with the regulations?
 - Relevant regulations: 40 CFR 80.125(d)

RNG Producer

Municipal Wastewater Treatment Facility Digester

- Do municipal wastewater treatment facility digesters that take in small amounts of non-predominately cellulosic material (<5%) generate cellulosic RINs (since the blended cellulosic content is over 75%) or would that be considered a mixed digester?
 - Relevant regulations: 40 CFR 80.2 (definitions of “mixed digester” and “municipal wastewater treatment facility digesters”)

Measurement Requirements Treated Biogas vs. RNG

- Does the lack of an explicit reference to treated biogas mean that treated biogas is not subject to a measurement requirement?
 - Relevant regulations: 40 CFR 80.2 (definition of “continuous measurement”), 80.140(d)(2), 80.155

Measurement Requirements

Meter Placement

- When and where is measurement of raw biogas required?
 - Relevant Regulations: 40 CFR 80.2 (definition of “biogas”), 80.105(f)
- Where is flow measurement required when biogas and RNG facilities are co-located and in cases where biogas may be centrally collected?
 - Relevant Regulations: 40 CFR 80.105(f), 80.110.
- Is H₂S removal from biogas considered pre-treatment? Can H₂S and moisture be removed prior to measurement of biogas flow and methane content from a landfill/digester?
 - Relevant Regulations: 40 CFR 80.2 (definition of “biogas”), 80.105(f)

Measurement Requirements

Use of Pipeline Statements

- Can pipeline statements be used to establish volumes of RNG injected and natural gas being withdrawn?
 - Relevant Regulations: 40 CFR 80.155(a)(3)

Measurement Requirements

Multiple Meters

- Which measurements are to be used for RIN generation purposes if multiple meters are installed upstream of the injection point? Can the procedure under the legacy biogas provisions whereby the lower of the aggregate upstream and pipeline injection quantity be used?
 - Relevant Regulations: 40 CFR 80.135(d)(7)

Measurement Requirements Process for AMP Requests

- How will EPA determine if the criteria for an Alternative Measurement Protocol (AMP) are met? Is the determination in EPA's discretion or are there thresholds/benchmarks that are used?
 - Relevant Regulations: 40 CFR 80.155(a)(3)
- Do AMPs have to be approved prior to registration or can they be done in parallel with registration?
 - Relevant Regulations: 40 CFR 80.135(c)(3)(iii)(F) and (d)(3)(iii)(F), 80.155(a)(1) and (2), 80.155(3)(ii)

Measurement Requirements Process for AMP Requests

- Can EPA decline/not approve an AMP request?
 - Relevant Regulations: 40 CFR 80.155(a)(3)
- If declined or not approved, is a facility's registration placed on hold if the facility can't procure the specified meters by the BRRR effective date? Will the facility be given a certain amount of time to comply somehow?
 - Relevant Regulations: 40 CFR 80.135(c)(3) and (d)(3)
- Will Coriolis flow meters be approved as an AMP for all program participants, given that the majority of the RNG industry uses them?
 - Relevant Regulations: 40 CFR 80.135(c)(3)(iii)(C) and (F), 80.135(d)(3)(iii)(C) and (F), 80.155(a)(3)

Reporting

- What units are reported for biogas, RNG, and CNG/LNG, Btu LHV or Btu HHV?
 - Relevant Regulations: 40 CFR 80.135, 80.140

Registration

Production Capacity

- How is the production capacity of biogas production facilities and RNG production facilities determined, particularly for facilities that produce biogas used outside of the RFS program or that have multiple collection systems? For example, how would EPA handle a landfill that had multiple collection systems with one system collecting biogas for RNG production under the RFS and the other collection system collecting gas for a non-RFS use?
 - Relevant Regulations: 40 CFR 80.135(c)(1) and (d)(1)

Registration- Quality Assurance Program

- Does the Quality Assurance Program only apply to generation of the RINs for biogas-derived renewable fuels and RNG, or does it also apply to the transfer and separation of such RINs?
 - Relevant Regulations: 40 CFR 80.170, 80.1464(c), 80.165(e)

Registration

- Section IV.A. of the EPA's March 2024 guidance document explicitly gives new biogas facilities the opportunity to demonstrate why they use a particular meter (i.e., gas analyzer) for biogas measurement due to excess moisture or other constituents using a more streamlined approach, whereas existing facilities would follow the AMP process. Can I make this argument for an existing facility?
 - Relevant Regulations: 40 CFR 80.155(a)(3)
- For a facility that submitted a registration update by the October 1, 2024 submission date, if the registration includes a new ER, would all three-year ER updates be due January 31, 2028?
 - Relevant Regulations: 40 CFR 80.135(b)(2)(ii), 80.1450(d)(3)

Registration (Continued)

- Can RNG from multiple RNG Producers be delivered to a single dispensing station in a month?
 - Relevant Regulations: 40 CFR 80.125(d)(2)(v)
- A checklist of registration requirements or forms to help facilities understand each requirement for registration would help reduce the burden on EPA and streamline the registration process.
- Can a party serving in multiple roles (Biogas Producer/RNG Producer/RNG RIN Separator) submit one consolidated registration package/ER or would multiple packages/reports be required?
 - Relevant Regulations: 40 CFR 80.135(b)(3)

Registration CNG/LNG Dispenser Locations

- How will CNG/LNG dispenser locations be tracked? For example, is each CNG dispensing location going to have a unique identifier in CDX/EMTS?
 - Relevant regulations: 40 CFR 80.135(f)

RIN Generation/Retirement

- Would RNG used for a purpose other than to produce renewable fuel (e.g., for process heat or energy) be required to generate RINs that are subsequently retired?
 - Relevant Regulations: 40 CFR 80.125, 80.1426(f)(12) (Process heat produced from combustion biogas or RNG) or 80.1426(f)(13) (Advanced biofuel grain sorghum pathway requirements for RFP facilities)

RNG RIN Separator Identification; Requirements

- How does the role of an RNG RIN Separator change its compliance requirements (e.g., a party withdrawing gas from the pipeline vs. a compression station owner vs. operator of a dispensing station)?
 - Relevant regulations: 40 CFR 80.115, 80.125

RNG RIN Separator Identification

- To the extent an RNG RIN Separator is not the owner or operator of the CNG/LNG production equipment, is separation status and satisfaction of requirements evidenced through collection of documentation from the relevant parties?
What evidence is required?
 - Relevant Regulations: 40 CFR 80.125(d)(2)(ii)(B) (RNG RIN Separator relying on documentation from another party)
- Is there a hierarchy or preference as to the potential parties that can register and act as the RNG RIN Separator?
 - Relevant Regulations: 40 CFR 80.2, 80.125(d) (RIN Separation)

RNG RIN Separator Reporting

- How does a RNG RIN Separator confirm RNG RIN separation and how does that confirmation interact with the QAP process?
 - Relevant Regulations: 40 CFR 80.170 (Quality Assurance Plan), 80.1464(c) (Other parties owning RINs), 80.165(e) (General procedures for RNG RIN separators)
- Does Section 80.140(e) impose a quarterly and monthly reporting requirement on RNG RIN Separators? What are the differences between the quarterly and monthly reports?
 - Relevant Regulations: 40 CFR 80.140(e) (RNG RIN separators)

RNG RIN Separator Reporting

- How does the RNG RIN separator report monthly based on “each batch of biogas” as specified under 40 CFR 80.140(e)(2)?
 - Relevant regulations: 40 CFR 80.140(e)(2), 40 CFR 80.1451(f)(4)
- Could EPA provide guidance on the timing of RNG RIN separation events and reporting, particularly as it relates to: (a) comparison or use of pipeline statements to confirm withdrawn volumes and (b) use of RNG that has been in storage?
 - Relevant regulations 40 CFR 80.125, 80.140(e)(2), 80.1428(c)

Recordkeeping

- What records for “digester feedstocks” are required under Section 80.145(b)(7) and how does the requirement differ from Section 80.145(b)(8)?
 - Relevant Regulations: 40 CFR 80.145(b)(7) (Recordkeeping requirements for digester feedstocks), 80.145(b)(8) (biogas from renewable biomass information and documentation), 80.1454 (Recordkeeping requirements)

Recordkeeping PTDs

- Are PTDs required even if the Biogas Producer, RNG Producer and/or RNG RIN Separator are the same entity?
- Would the transfer of biogas/RNG designated for process heat/energy require PTDs?
 - Relevant Regulations: 40 CFR 80.1453(a) (PTD requirements), 80.150(b)(3)(iv) (Biogas designated for use as process heat or energy), 80.125(e)(3) (use of RNG other than to produce renewable CNG/LNG)

RNG Used as Process Heat

- The provisions in the regulations appear to contemplate generation of RINs when RNG is used as process heat, which would then be retired. Could EPA provide guidance on when an RNG RIN would be retired for RNG used as process heat and how these provisions apply in cases where a RIN is not generated for RNG? What is an RNG producers responsibility if a downstream party uses RNG for which a RIN was generated as process heat?
 - Relevant Regulations: 40 CFR 80.1426(f)(12) and (13), 80.125

Reporting Recorded vs Reported Volumes

- Can EPA provide guidance on how the “recorded” measurements in the definition of continuous measurement at 40 CFR 80.2 interacts with the reporting requirements in 40 CFR 80.140?
 - Relevant Regulations: 40 CFR 80.105(j), 80.110(j), 80.135(d)(7)
- Can EPA provide guidance explaining what happens in the case of data gaps that might occur and when data substitution may be appropriate?
 - Relevant Regulations: 40 CFR 80.105(j), 80.110(j), 80.135(d)(7)



Submit any questions to the Fuels Program Helpdesk at FuelsProgramSupport@epa.gov.



Closing

Mary Manners

Office of Transportation and Air Quality

April 12, 2024

Additional resources

- Submit any questions to FuelsProgramSupport@epa.gov
- Slides for this workshop will be posted at:
<https://www.epa.gov/renewable-fuel-standard-program/rfs-set-rule-implementation-webinars>
- For job aids for Set Rule implementation, go to:
<https://www.epa.gov/fuels-registration-reporting-and-compliance-help>
- A list of all regulatory requirements are available at:
<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-80?toc=1>



Thank you!