
National Renewable Fuel Standard Program Engineering Review

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Office of Transportation and Air Quality
US Environmental Protection Agency



Overview

- Who is required to submit an engineering review?
- Who is qualified to conduct the engineering review?
- What are the requirements for the engineering review?
- What supplemental plans may be required to be submitted with the engineering review?
 - Process heat fuel supply plan
 - Separated food waste, yard waste or MSW plan
- What are the reporting deadlines for the engineering review and supplemental plans?

Who is required to submit an engineering review?

- The purpose of the engineering review is for an independent third party to identify, evaluate, and verify the accuracy (and any discrepancies) of the information the renewable fuel producer submitted to EPA as part of their registration requirements
- All renewable fuel producers (domestic or foreign) are required to conduct and submit an engineering review

Who is qualified to conduct the engineering review?

- The engineering review should be conducted by a professional engineer licensed by the appropriate state agency in the United States (or foreign equivalent) who works in the chemical engineering field
- The professional engineer should also be an independent third party
 - The third party should not be operated by the renewable fuel producer or any subsidiary or employee of the renewable fuel producer
 - The third party should be free of any interest in the renewable fuel producer's business
 - The renewable fuel producer should be free of all interest in the third party's business

What are the requirements for the engineering review?

- The engineering review should be based on a site visit and review of all relevant documents
- The third party engineer should verify the accuracy of all the registration information submitted to EPA by the renewable fuel producer
 - State whether they agree with the registration information submitted
 - Identify and explain any exceptions or discrepancies between their review and the registration information submitted

What are the requirements for the engineering review? (continued)

- Provide professional engineer's license and work experience documentation
- Provide independent third party verification
- Provide the types of renewable fuel produced or capable of producing without significant modification to the facility
- For each type of renewable fuel:
 - Provide the types of feedstocks used
 - Provide production process train
 - Provide the types of process heat fuel used
 - Provide the types of co-products produced

Note: EPA is developing compliance guidelines for the engineering review, which will be posted to the RFS website shortly

What supplemental plans may be required to be submitted with the engineering review?

- **Process heat fuel supply plan**
 - Required for all renewable fuel producers
- **Separated yard waste plan**
 - Required for producers using separated yard waste as feedstock
- **Separated food waste plan**
 - Required for producers using separated food waste as feedstock
- **Separated municipal solid waste (MSW) plan**
 - Required for producers using separated MSW as feedstock

Process heat fuel supply plan

- Process heat fuel supply plan
 - List the types of process heat fuel used (i.e. natural gas, biogas, coal, etc.)
 - Name and location of facility providing the process heat fuel to the renewable fuel producer
 - Provide copies of applicable air permits that govern the construction or operation of the renewable fuel facility
 - Copies of documentation that demonstrate the facility's actual peak capacity if permissible capacity is not specified on any applicable air permits
 - For grandfathered facilities, provide copies of air permits that demonstrate the date in which construction commenced
 - For a facility using biogas for process heat, provide an affidavit from the biogas supplier stating its intent to supply biogas to the renewable fuel producer

Separated food waste and yard waste plan

- Separated food waste plan
 - Documentation of how the waste will be collected
 - Documentation of how the cellulosic and non-cellulosic portions of the waste will be quantified
 - Documentation of how the renewable fuel producer shall conduct ongoing verification that such waste consists only of food waste that it is kept separate since generation

- Separated yard waste plan
 - Documentation of how the waste will be collected
 - Documentation of how the renewable fuel producer shall conduct ongoing verification that such waste consists only of yard waste that it is kept separate since generation

Separated municipal solid waste (MSW) plan

■ Separated MSW Plan

- Name and location of waste facility from which the MSW was collected
- Extent and nature of recycling that occurred prior to receipt of the waste material by the renewable fuel producer
- Identification and explanation of the available recycling technology and practices that were selected to remove the recyclable materials
- Evidence of contractual arrangements for paper, cardboard, plastics, rubber, textiles, metals or glass that is recycled
- Certification by the renewable fuel producer that the recycling is conducted in a manner consistent with goals and requirements of applicable state and local laws relating to recycling and waste management

Note: EPA is developing compliance guidelines for the separated MSW plan, which will be posted to the RFS website shortly

What are the reporting deadlines for the engineering review and supplemental plans?

- Submit an initial engineering review by July 1, 2010, or 60 days prior to the generation of RINs, whichever date comes later
- Grandfathered facilities are granted a 6-months extension from July 1, 2010, but no later than December 31, 2010
- Submit an updated engineering review every 3 calendar years from the date of initial registration
- Submit an updated engineering review at least 60 days prior to producing a new type of renewable fuel for any changes to a facility that changes the renewable fuel category (or D code) that is not reflected in their registration

Note: The regulation does not currently provide a 6-months extension for grandfathered facilities to submit their engineering review. We intend to issue a direct final rule to amend the regulations to grant this extension.



Questions?



■ For Additional information:

<http://www.epa.gov/otaq/fuels/renewablefuels/index.htm>

- Includes Factsheets
- RFS2 Rulemaking Package
 - Preamble
 - Regulations
 - Regulatory Impact Analysis
- Links to Other Information
- Frequently Asked Questions

■ Send new questions to: EPAFuelsPrograms@epa.gov