



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

**NOV 07 2011**

VIA EMAIL to [kshaw@astroil.com](mailto:kshaw@astroil.com)

Astra Oil Company  
Attention: Kristi Shaw, Responsible Corporate Officer  
301 Main St., Suite 201  
Huntington Beach, CA 92648

Re: Notice of Violation of Renewable Fuel Standards  
File Number AED/MSEB # 7954

Dear Kristi Shaw:

The Environmental Protection Agency (EPA or we) has commenced an investigation into Astra Oil Company (Astra or you) regarding whether you used invalid Renewable Identification Numbers (RINs) to meet your 2010 Renewable Volume Obligation (RVO) under the Clean Air Act (CAA). Based on the information available to the EPA as a result of this investigation, we have determined that Clean Green Fuels, LLC (Clean Green Fuels) created invalid RINs, and that Astra used some of the RINs created by Clean Green Fuels in an effort to satisfy your 2010 RVO. Use of invalid RINs to satisfy RVOs is a violation of the EPA's regulations governing RINs and renewable fuels. 40 C.F.R. § 80.1460(c).

Section 211(o) of the CAA originally was enacted as part of the Energy Policy Act of 2005 (EPAct), and was amended by the Energy Information and Security Act of 2007 (EISA). The EPA promulgated the original renewable fuels standards regulations (RFS 1) at 40 C.F.R. Part 80, Subpart K to implement EPAct, and subsequently promulgated the current renewable fuels standards regulations (RFS 2) at 40 C.F.R. Part 80, Subpart M to implement EISA. EPAct set the first national renewable fuel mandate in the United States, and required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. EISA required the EPA to make several important changes to the original renewable fuels regulations, including increasing the volume of renewable fuel required to be blended into transportation fuel to 36 billion gallons per year by 2022. EISA and the RFS 2 regulations also established new categories of renewable fuel with separate volume requirements, and set new greenhouse gas (GHG) emission reduction thresholds for each separate category of renewable fuel. The RFS 2 regulations lay the foundation to achieve significant reductions of GHG

emissions from the use of renewable fuels, reduce petroleum importation, and encourage the development and expansion of our nation's renewable fuels sector.

The RFS 2 regulations require petroleum refiners and importers (referred to as "obligated parties"), and exporters of renewable fuel to acquire sufficient RINs to demonstrate compliance with their RVOs. The regulations include a credit trading program to facilitate compliance with the renewable fuel standards. The credit trading program allows obligated parties and exporters of renewable fuel to comply with their RVOs through the purchase of RINs.

The RFS 2 regulations provide that no person shall use invalid RINs to meet their RVO, regardless of that person's good faith belief that the RINs were valid at the time they were acquired. 40 C.F.R. §§ 80.1431(b)(2), 80.1460(c)(1). RINs that do not represent renewable fuel are invalid. 40 C.F.R. § 80.1431(a)(1)(vi).

Based on available information, the EPA has determined that Astra used the 2,430,750 invalid RINs identified in Attachment A to meet your 2010 RVO. These RINs are invalid because they do not represent renewable fuel. The company that generated these RINs, Clean Green Fuels, neither produced nor imported any biodiesel as necessary to legally generate these RINs. This determination is based upon the EPA's inspection of the purported production facility and subsequent investigation.

As noted above and detailed in 40 C.F.R. § 80.1431(b), invalid RINs cannot be used for compliance. In view of the EPA's determination that Clean Green Fuels RINs are invalid, any RINs generated by Clean Green Fuels must be removed from your 2010 annual compliance report and a corrected report must be resubmitted. The resubmitted report must include only valid RINs. We request that you make these adjustments and resubmit your annual compliance report within 14 business days after your receipt of this Notice of Violation (NOV). You may contact the EPA Fuels Help Line at (202) 343-9755 if you have questions regarding these reports, including how to make adjustments.

The EPA issues this NOV under Sections 205 and 211 of the CAA, 42 U.S.C. §§ 7524 and 7545, for the violations described above. Sections 205 and 211 of the CAA authorize the EPA to assess a civil penalty of up to \$37,500 for every day for each violation, plus the economic benefit or savings resulting from each violation. 42 U.S.C. §§ 7524, 7545(d); *see also* 40 C.F.R. §§ 19.4, 80.1461, 80.1463. In determining an appropriate penalty for violations, the EPA considers the gravity of the violation, the economic benefit or savings (if any) resulting from the violation, the size of your business, your history of compliance with the CAA, actions taken by you to remedy the violation and prevent future violations, the effect of the penalty on your ability to continue in business, and other matters as justice may require. 42 U.S.C. § 7524. This NOV does not create any rights or waive any of your obligations under the CAA, but rather is for the purpose of notifying you of the violations.

We are offering you an opportunity to confer with us about the violations alleged in this NOV. The conference will give you an opportunity to present information on the alleged violations, any efforts you have taken to comply, and the steps you will take to prevent future violations.

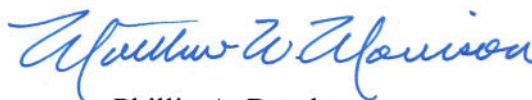
The EPA attorney assigned to this matter is Evan M. Belser. He can be reached at (202) 564-6850, Belser.Evan@epa.gov, or at the following address:


Evan M. Belser, Attorney Adviser  
EPA, Air Enforcement Division  
1200 Pennsylvania Avenue, NW  
Ariel Rios South Building Room 1111A, Mailcode 2242A  
Washington, D.C. 20460 (20004 for non-USPS couriers)

Contact Mr. Belser to request the conference described above. Any conference should be held within 60 calendar days of your receipt of this NOV. By offering the opportunity for a conference, or participating in one, the EPA does not waive or limit its right to any remedy available under the CAA.

We appreciate your attention to this important matter and look forward to working with you to reach a resolution.

Sincerely,



 Phillip A. Brooks  
Director  
Air Enforcement Division

cc: Matthew W. Morrison, Associate Director, Air Enforcement Division  
Jacqueline Robles Werner, Chief, Mobile Source Enforcement Branch  
Jeffrey A. Kodish, Fuels Team Leader, Mobile Source Enforcement Branch

Attachment A

Notice of Violation of Renewable Fuel Standards, File Number AED/MSEB # 7954

**List of Invalid Renewable Identification Numbers Astra Oil Company  
Retired for Compliance Purposes**

22010346084000035311520000000100012000	22010346084000035531520000000100006000
22010346084000037021520000000100006750	22010346084000036731520000000100007500
22010346084000036551520000000100009750	22010346084000036691520000000100012000
22010346084000036211520000000100006000	22010346084000037401520000000100006750
22010346084000036861520000000100009000	22010346084000036681520000000100009750
22010346084000037241520000000100007500	22010346084000036351520000000100006000
22010346084000035911520000000100010500	22010346084000037671520000000100009000
22010346084000037061520000000100009750	22010346084000037381520000000100007500
22010346084000035591520000000100007500	22010346084000036071520000000100010500
22010346084000035701520000000100012000	22010346084000037281520000000100009750
22010346084000037581520000000100006750	22010346084000037501520000000100009750
22010346084000035571520000000100009750	22010346084000035811520000509700012000
22010346084000035851520000000100007500	22010346084000037821520000000100006750
22010346084000037011520000000100006000	22010346084000035681520000000100009750
22010346084000035621520000000100009000	22010346084000036741520000000100003796
22010346084000037561520000000100007500	22010346084000036011520000000100007500
22010346084000036881520000000100010500	22010346084000035821520000000100009750
22010346084000037371520000000100009750	22010346084000037121520000000100006000
22010346084000037471520000000100010500	22010346084000037661520000000100007500
22010346084000037631520000000100009750	22010346084000035961520000000100012000
22010346084000035871520000000100006750	22010346084000037151520000000100010500
22010346084000035901520000000100011250	22010346084000036481520000000100010500
22010346084000035381520000000100006750	22010346084000037741520000000100009750
22010346084000036741520000379700007500	22010346084000036201520000000100006750
22010346084000036161520000000100007500	22010346084000035101520000000100011250
22010346084000036051520000000100009750	22010346084000036581520000000100006750
22010346084000037441520000000100006000	22010346084000036341520000000100007500
22010346084000035431520000000100007500	22010346084000036131520000000100009750
22010346084000036221520000000100012000	22010346084000037831520000000100006000
22010346084000037201520000000100012000	22010346084000035751520000000100007500
22010346084000035271520000000100010500	22010346084000036931520000000100012000
22010346084000035411520000000100009750	22010346084000037511520000000100012000
22010346084000036761520000000100006750	22010346084000035501520000000100010500
22010346084000036391520000000100009750	22010346084000036511520000000100009750
22010346084000035091520000000100006000	22010346084000037001520000000100006750
22010346084000035221520000000100007500	22010346084000036841520000000100007500
22010346084000037861520000000100012000	22010346084000036801520000000100009750
22010346084000035291520000000100009750	22010346084000036601520000000100006000
22010346084000035891520000000100006000	22010346084000035361520000000100007500
22010346084000036041520000000100009000	22010346084000035171520000000100012000
22010346084000015161520000000100003098	22010346084000036541520000000100009750
22010346084000037071520000000100007500	22010346084000036191520000000100006000
22010346084000036921520000000100009750	22010346084000036851520000000100009000

22010346084000037231520000000100007500  
22010346084000037051520000000100009750  
22010346084000035601520000000100007500  
22010346084000035561520000000100012000  
22010346084000037571520000000100006750  
22010346084000035301520000000100009750  
22010346084000035841520000000100007500  
22010346084000036791520000000100006000  
22010346084000035231520000000100009000  
22010346084000035371520000000100002929  
22010346084000037551520000000100007500  
22010346084000036471520000000100010500  
22010346084000037361520000000100009750  
22010346084000037461520000000100010500  
22010346084000037621520000000100009750  
22010346084000035861520000000100006750  
22010346084000035071520000000100006750  
22010346084000035731520000000100009750  
22010346084000036151520000000100007500  
22010346084000035991520000000100009750  
22010346084000037421520000000100006000  
22010346084000037801520000000100007500  
22010346084000036121520000000100012000  
22010346084000037191520000000100012000  
22010346084000035261520000000100010500  
22010346084000037871520000000100009750  
22010346084000036751520000000100006750  
22010346084000036431520000000100007500  
22010346084000036241520000000100009750  
22010346084000035081520000000100006000  
22010346084000035211520000000100007500  
22010346084000037761520000000100012000  
22010346084000035661520000000100010500  
22010346084000035251520000000100009750  
22010346084000035881520000000100006000  
22010346084000036031520000000100009000  
22010346084000036981520000000100007500  
22010346084000036911520000000100009750  
22010346084000035481520000000100006000  
22010346084000036661520000000100007500  
22010346084000035401520000000100012000  
22010346084000037101520000000100006750  
22010346084000036671520000000100009750  
22010346084000036301520000000100006000  
22010346084000037271520000000100009000  
22010346084000037311520000000100007500

22010346084000036061520000000100010500  
22010346084000037221520000000100009750  
22010346084000035671520000000100007500  
22010346084000037811520000000100006750  
22010346084000035641520000000100009750  
22010346084000035371520000293000006750  
22010346084000036001520000000100007500  
22010346084000037111520000000100006000  
22010346084000037651520000000100007500  
22010346084000037141520000000100010500  
22010346084000037491520000000100009750  
22010346084000037711520000000100010500  
22010346084000037731520000000100009750  
22010346084000036181520000000100006750  
22010346084000037131520000000100011250  
22010346084000035461520000000100006750  
22010346084000036261520000000100007500  
22010346084000036101520000000100009750  
22010346084000037611520000000100006000  
22010346084000035741520000000100007500  
22010346084000036381520000000100012000  
22010346084000037351520000000100012000  
22010346084000036651520000000100010500  
22010346084000036501520000000100009750  
22010346084000036991520000000100006750  
22010346084000036831520000000100007500  
22010346084000036461520000000100009750  
22010346084000035151520000000100006000  
22010346084000035351520000000100007500  
22010346084000035161520000000100012000  
22010346084000035341520000000100009750  
22010346084000035951520000000100006000  
22010346084000036451520000000100009000  
22010346084000035051520000446500007500  
22010346084000037161520000000100007500  
22010346084000036961520000000100009750  
22010346084000035521520000000100007500  
22010346084000035551520000000100012000  
22010346084000037431520000000100006750  
22010346084000036721520000000100009750  
22010346084000036771520000000100006000  
22010346084000035241520000000100009000  
22010346084000037481520000000100007500  
22010346084000036331520000000100010500  
22010346084000037331520000000100009750  
22010346084000037301520000000100010500

22010346084000037541520000000100009750  
22010346084000036531520000000100011756  
22010346084000035061520000000100006750  
22010346084000035721520000000100009750  
22010346084000036081520000000100007500  
22010346084000035981520000000100009750  
22010346084000037181520000000100006000  
22010346084000037791520000000100007500  
22010346084000036111520000000100012000  
22010346084000037041520000000100012000  
22010346084000035121520000000100010500  
22010346084000037781520000000100009750  
22010346084000036281520000000100006750  
22010346084000036611520000000100006750  
22010346084000036421520000000100007500  
22010346084000036231520000000100009750  
22010346084000035391520000000100006000  
22010346084000035201520000000100007500  
22010346084000037751520000000100012000  
22010346084000035651520000000100010500  
22010346084000035191520000000100009750  
22010346084000036531520001175700012000  
22010346084000036971520000000100007500  
22010346084000036871520000000100009750  
22010346084000035471520000000100006000  
22010346084000036571520000000100007500  
22010346084000035321520000000100012000  
22010346084000037091520000000100006750  
22010346084000036631520000000100009750  
22010346084000036291520000000100006000  
22010346084000037261520000000100009000  
22010346084000037251520000000100007500  
22010346084000035921520000000100010500  
22010346084000037211520000000100009750  
22010346084000035611520000000100007500  
22010346084000035711520000000100012000  
22010346084000037601520000000100006750  
22010346084000035581520000000100009750  
22010346084000035931520000000100007500  
22010346084000037031520000000100006000  
22010346084000035631520000000100009000  
22010346084000037641520000000100007500  
22010346084000036891520000000100010500  
22010346084000037451520000000100009750  
22010346084000037701520000000100010500  
22010346084000037691520000000100009750

22010346084000036171520000000100006750  
22010346084000036311520000000100011250  
22010346084000035451520000000100006750  
22010346084000036251520000000100007500  
22010346084000036091520000000100009750  
22010346084000037591520000000100006000  
22010346084000035441520000000100007500  
22010346084000036371520000000100012000  
22010346084000037341520000000100012000  
22010346084000036641520000000100010500  
22010346084000035421520000000100009750  
22010346084000036781520000000100006750  
22010346084000036821520000000100007500  
22010346084000036401520000000100009750  
22010346084000035141520000000100006000  
22010346084000035281520000000100007500  
22010346084000036521520000000100012000  
22010346084000035331520000000100009750  
22010346084000035941520000000100006000  
22010346084000036441520000000100009000  
22010346084000037081520000000100007500  
22010346084000036951520000000100009750  
22010346084000035541520000000100006000  
22010346084000035131520000000100007500  
22010346084000036701520000000100012000  
22010346084000037411520000000100006750  
22010346084000036711520000000100009750  
22010346084000036361520000000100006000  
22010346084000037681520000000100009000  
22010346084000037391520000000100007500  
22010346084000036321520000000100010500  
22010346084000037321520000000100009750  
22010346084000037531520000000100009750  
22010346084000037841520000000100006750  
22010346084000035691520000000100009750  
22010346084000036021520000000100007500  
22010346084000035831520000000100009750  
22010346084000037171520000000100006000  
22010346084000037721520000000100007500  
22010346084000035971520000000100012000  
22010346084000037291520000000100010500  
22010346084000036941520000000100012000  
22010346084000035111520000000100010500  
22010346084000037771520000000100009750  
22010346084000036271520000000100006750  
22010346084000035491520000000100011250

22010346084000036591520000000100006750  
22010346084000036411520000000100007500  
22010346084000036141520000000100009750  
22010346084000037851520000000100006000  
22010346084000036491520000000100007500  
22010346084000037521520000000100012000

22010346084000035511520000000100010500  
22010346084000035181520000000100009750  
22010346084000036901520000000100007500  
22010346084000036811520000000100009750  
22010346084000036621520000000100006000  
22010346084000036561520000000100007500