

**Guidance to Parties Submitting
Round-Robin Data to Support Requests
for Approval of Alternate Non-VCSB
Test Methods**

Compliance Division
Office of Transportation and Air Quality
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The general description of the application process provided here may not apply to a particular situation. Interested parties are free to raise questions about the substance of this guidance and its applicability to a particular situation. EPA may adopt approaches on a case-by-case basis that differ from those described in this guidance.

Mention of trade names or commercial products does not constitute endorsement or recommendation for their use.

This is a living document and may be revised periodically without public notice. EPA welcomes public input on this document at any time.

Introduction: EPA published requirements on the “Performance-Based Analytical Test Method Approach” on April 28, 2014.

Applicable Dates: These requirements for reporting under § 80.47(m)(4) are effective on 1-1- 2016.

40 CFR 80.47 requires that instrumentation used to measure various physical properties in motor vehicle fuel comply with certain minimum accuracy and precision limits. These limits are expressed in terms of standard deviation and arithmetic average.

Limits are specified for the following items:

1. Sulfur in gasoline
2. Sulfur in butane
3. Olefins in gasoline
4. Aromatics in gasoline
5. Oxygen and oxygenate content in gasoline
6. RVP in gasoline
7. Distillation temperatures for gasoline
8. Benzene in gasoline
9. Aromatics in Diesel fuel
10. Reference installations

The following example shows the CFR requirement for Sulfur in gasoline:

“(b) *Precision and accuracy criteria for approval for the absolute fuel parameter of gasoline sulfur.* (1) *Precision.* Beginning January 1, 2016, for motor vehicle gasoline, gasoline blendstock, and gasoline fuel additives subject to the gasoline sulfur standard at §80.195 and §80.1603, the maximum allowable standard deviation computed from the results of a minimum of 20 tests made over 20 days (seven or fewer tests per week and two or fewer tests per day) on samples using good laboratory practices taken from a single homogeneous commercially available gasoline must be less than or equal to 1.5 times the repeatability “r” divided by 2.77, where “r” equals the ASTM repeatability of ASTM D7039 (Example: A 10 ppm sulfur gasoline sample: Maximum allowable standard deviation of 20 tests $\leq 1.5 \times (1.75 \text{ ppm} / 2.77) = 0.95 \text{ ppm}$). The 20 results must be a series of tests with a sequential record of analysis and no emissions. A laboratory facility may exclude a given sample or test result only if the exclusion is for a valid reason under good laboratory practices and it maintains records regarding the sample and test results and the reason for excluding them.”

Instructions for completing reporting form

The reporting form has a tab for general information, a tab for laboratory identification data, a tab for Round-Robin data, and a tab for Precision data. Lab Name is entered automatically on the “Test data – Round Robin” tab once it is entered on the “Lab data” tab, and Method Name is entered automatically on the “Test data – Round Robin” tab once it is entered on the “General Info” tab. The form is intended to be used for one fuel parameter, so if you are applying for permission to use a method(s) which is applicable to more than one parameter, complete a form for each method.

All tabs have a field for indicating whether confidentiality is claimed for the information on the tab.

General information

Enter the fuel parameter type by selecting a standard type from the pulldown list.

Enter the data in columns P-S and U-AA. These fields have no pulldown lists, and accept whatever the user types.

Review the 12 attestations and “Attest” using the pulldown lists, and complete column T using the pulldown list.

Laboratory identification information

Enter location and contact information on this tab.

Test data

Enter test results for all labs that participated in the round robin. Enter sample identification numbers in the rows where “1”, “2”, “3”, etc. appear in column D. Sample ID numbers do not need to be entered again for re-tests of samples. As a reminder, a yellow popup message appears when a cell in column D, below the “1”, “2”, or “3”, is selected, indicating that data should not be manually entered here. Enter the date and time for each test result.

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The public reporting and recordkeeping burden for this collection of information is estimated to average 180 hours per response. Send comments on the Agency’s need for this information, the accuracy of the providing burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

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