



Transfer Limits

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Biointermediates workshop

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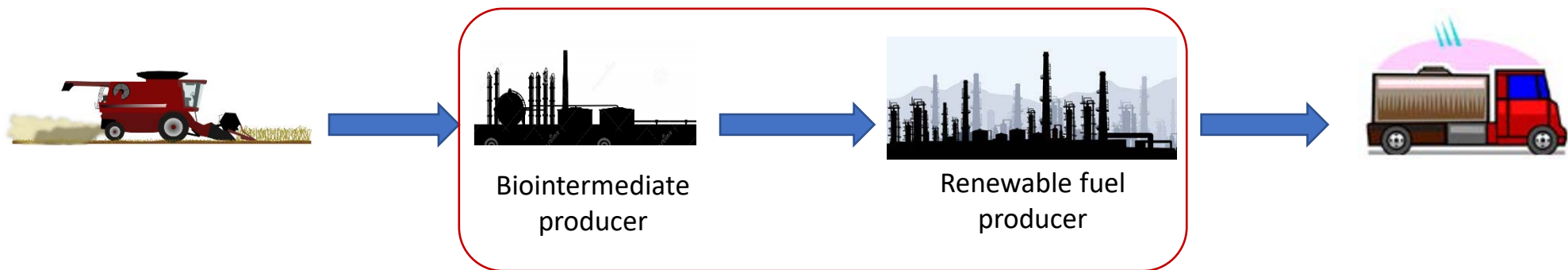
September 29, 2022

About this Presentation

- This presentation is being given to assist stakeholders in complying with the regulations regarding biointermediates finalized in the 2020-2022 RVO final rule.
- The presentation is not intended to discuss the merits of the regulatory requirements but rather to assist stakeholders in implementing them.
- To the extent participants provide questions, advice, or materials during or after this meeting, they should do so in their individual capacity.
- This presentation is not intended to supplant the regulatory requirements. Parties must comply with the applicable regulatory requirements regardless of whether and how those requirements are discussed in these presentations.
- The topics in this presentation do not represent future EPA decisions or actions in any particular circumstance and do not bind EPA to any particular decision or action.

Transfer limits overview

- The regulations limit how biointermediates can be transferred from a biointermediate producer to a renewable fuel producer
- This impacts
 - the biointermediate producer
 - the renewable fuel producer
 - the parties transporting biointermediates
- The associated requirements apply regardless of whether the owners of the facilities producing the biointermediate and renewable fuel are the same or different



A biointermediate production facility

- May only produce one type of biointermediate in the RFS program
- May only transfer biointermediates to one renewable fuel production facility
- May change the associated renewable fuel production facility only once per calendar year unless EPA approves additional changes
- May not commingle biointermediates with other feedstocks or biointermediates from other facilities
- May also produce renewable fuel (which would make it both a renewable fuel production facility and a biointermediate production facility)



A transporter of biointermediates

- Cannot commingle a batch of biointermediates with other feedstocks
- Cannot commingle a batch of biointermediates with biointermediates from different facilities, even if they are the same type
- Can commingle batches of biointermediates from the same facility during transport



A renewable fuel production facility processing biointermediates

- Can commingle batches of biointermediates on-site with:
 - Biointermediates from multiple facilities
 - Biointermediates of different types
 - Other feedstocks
- Can store batches of biointermediates of the same type from multiple facilities off-site if:
 - No other feedstocks, biointermediates, foreign ethanol, or renewable fuels are comingled in the off-site storage tank
 - The renewable fuel producer owns or is the sole position holder in the off-site storage tank.



Additional Association Changes

- EPA may allow, in its sole discretion, a biointermediate producer to change the designated renewable fuel production facility more than once per year
- To request approval to change the designed renewable fuel production facility more than once per year, email fuelsprogramsupport@epa.gov with the following:
 - Your company ID and your biointermediate production facility ID
 - The renewable fuel producer's company ID and facility ID
 - The reason for the change
 - The QAP provider for the biointermediate production facility and renewable fuel production facility
 - The effective date (cannot be retroactive)
- An example of a situation where EPA would consider it appropriate is the closure of the receiving renewable fuel production facility

