

## Fuels Streamlining Workshop May 20, 2020



#### **Anti-Trust Guidelines**

1. The purpose of RFGSA is to conduct compliance surveys. Discussions at RFGSA meetings should be limited to issues that are germane to this purpose.

2. There should be no discussion of competitively sensitive matters at RFGSA meetings. In particular, there should be no discussion of member/companies' (a) prices, (b) costs, or (c) confidential business information, including marketing plans.

3. Company representatives should not discuss their company's strategies and plans for complying with regulatory requirements.

4. Members generally may discuss whether RFGSA should support or oppose proposals for government regulation or legislation.

5. If anyone has a concern that a particular topic of discussion may present an antitrust issue, they should raise their concern with RFGSA. Mr. Lenski can consult with RFGSA's antitrust counsel as needed. In addition, members are always free to consult with their own company counsel.





- RFGSA
- Regulations
- Survey Designs/Methodology
- Costs
- Registration
- Data Management
- Next Steps
- Questions



#### RFG Survey Association Inc. Executive Summary

- Regulation Industry Response
- Independent Surveyor 501 (c6), No lobbying '1994
- Design & Implement, high quality, unbiased Compliance Survey Pgms to "<u>assist"</u> Fuels Industry
- Nationwide/U.S. Territories
- <u>Turn-key Program</u> & Process
- On-line Registration/Compliance Portal
- Low cost/Efficient 1 employee/Outsourced
- Budgets direct costs + shared OH
- Annual Audit



## **RFGSA - Organization**





## Biography – F.C. Lenski

#### **Experience:**

- RFGSA President 1994 Present
- American Petroleum Institute Consultant
- Mobil Oil Corp. Marketing & planning, specializing in large project program development & field implementation

#### **Education:**

- MBA, George Washington University
- Personal: Married, 2 children, reside S. VA



### **Fuels Streamlining Regulations**

- Background
- Fuels Streamlining Status
- Compliance Surveys
  - National Fuels Survey Program (NFSP)
  - National Sampling Oversight Program (NSOP)



# Background

- RFGSA Role/EPA 2014
- Nationwide Representative Gasoline Survey NFSP
  - -More efficient survey design
  - -NFSP Survey Designs 2/19/2019
- NSOP concept 2017
  - -Witness facility sampling, Testing
  - -Strawman proposal 7/2018
- Fuels Streamlining Draft Plan 03 & 04/2020



#### **Fuels Streamlining Regulations - Status**

- Fuels Streamlining Discussion Draft Proposed Regulations 12/19/2019
  - Participation: Claim oxy credit and or affirmative defense
    - Both NFSP and NSOP
- Notice of Proposed Rulemaking April 13, 2020
- Final Rule Sept 2020?
- Implementation target Jan 1, 2021 <u>but may include certain</u> <u>flexibilities</u>
- Includes: CA ,HI,AK, PR & Off-Road Diesel
  - HI,AK,PR RVP Exempt



#### National Fuels Sampling Program (NFSP) Gasoline requirements

- Independent surveyor
- Annual plan approved by EPA
- National representative Sampling- Size Est. 8600(6600 gas/2000 diesel)
- Testing- Benzene, Sulfur, Oxy, RVP(Summer)/Diesel Sulfur
- 10 Business Day Turnaround
- Results within 10 business days of receipt
- Expedited <u>Potential Non-Compliance (PNC's)</u>
- Reports EPA Quarterly/annually



#### NFSP Gasoline - Survey Design

- Nationwide study Regional/State focus
- Gasoline includes: E15/Diesel(On/Off-road)
- 4 strata
  - DPA Census Metropolitan Statistical Areas (40 MSAs)
  - TCA 2 Mile area each side of Interstate Hwys.
  - RSA Rural survey areas by census region , of remaining clusters of DPA & TCA
  - ESA E15 survey area by census region
- Seasonal sampling by quarter
  - Sample Size Est. 8600 (6600 gasoline/diesel stations)
- Includes coverage for AK, HI, PR, VI for ULSD only
- Survey Design Complete 2/2019 Pending FR



#### Testing

- EPA Approved Lab
- 10 Business day turnaround
- Testing
  - Benzene, Sulfur, Oxy, RVP(Summer)/Diesel Sulfur(On/Offroad)
  - Subset Distillation, Aromatics, Olefins
    - Designated Methods D5769/D6550



## Reporting

- Quarterly/Annual Reports
- Reporting 24 hrs. completed analysis
  - RVP, Gasoline Sulfur > 95 ppm, Diesel Sulfur >15 ppm
  - Ethanol vol% E10 <>10 ,E15 <10 or >15 , E15 labelling, Refusals
  - Sample Specification Failure auto resample
- PNC reporting retailer/branded refiner notified
- Shared Samples/Reporting
  - Primary is responsible for PNC management/closure
  - Secondary Brand/Product Registered FYI
- Non-Member (unidentified product)
  - PNC mail notification



#### National Sampling Oversight Program (NSOP)

- Workshop
- Terminology
- Requirements
- Process
- Other Issues



## **NSOP Workgroup**

- 9 Companies Refiners/Importers/<u>PM</u>
  - August December 2018, 03/2020
  - EPA informed/consulted
- Issues: Process, Notice, Sampling concerns, Testing, QA/Review, Registration
- Fuels Streamlining (Industry) workshop Coordinate with API/AFPM/Other Stakeholders – early/communication - NPRM



#### **Fuels Streamlining Workshop**

- Timing for implementation short
  - Get word out to Industry
  - Lower compliance costs
- Coordinate with RFGSA operations/budgeting
- Agreed to workshop/format
  - Format RFGSA public est. 3 hrs.
  - NPRM release scheduling
  - Workshop window May 18-June 5<sup>th</sup>
  - Virtual meeting <u>Record available on API/AFPM/RFGSA websites</u>
  - API/AFPM to coordinate
- EPA participation



## Terminology

- <u>Sampler</u> : Person performing site sampling
- RFGSA Inspector : witnesses sampling
- NSOP Project Manager <u>PM</u> : Coordinates project "<u>Events"</u>
- <u>Auditor</u> : <u>Independent 3<sup>rd</sup> Party -</u> Evaluates <u>Inspector</u>



#### National Sampling Oversight Program (NSOP) Requirements

- Independent surveyor
- Annual plan approved by EPA
- Sampling all participating facilities Min 1 summer/1 winter – Based on 350 registered facilities - <u>Est 1000 events</u>
- Refiner/Independent Lab Testing Sulfur(<80ppm), benzene, RVP(summer) - (Site Sample)
- RFGSA Lab Testing Sulfur(<80ppm), benzene, oxy, aromatics, olefins, Distillation, RVP(summer)- (Inspection Sample(s))
- Results within 10 business days of receipt
- Compare results Inspection Sample vs. Site Sample
- Expedited PNC's (Potential Non-Compliance)
- Reports EPA Quarterly/annually



#### Participation

- Defined in Regulations
  - Claim oxy credit and or affirmative defense
- Exceptions:
  - In-line blending Wavier, Butane/Pentane blender (PCG), Rail/Truck, CARB Fuel only, No ethanol dilution ?
- EPA Facility Estimate ?
  - approx. 350 participating facilities
  - List of potential participant Registration refine
  - Implications for planning PADD Importers



#### **NSOP Process Timeline**

#### Communication/Cooperation are "keys" to OUR "Success"

Time Frame

1)	Complete Registration/Enrollment Download <i>Registration Package</i> – Review Documents	Apr 15 to Aug 1
2)	Complete NSOP Facility Questionnaire for Each Registered Facility Email completed form to : <u>NSOP@RFGSA.ORG</u>	Before 10/31
3)	RFGSA Contacts Facility to Review Questionnaire Visit Scheduling	30 Days before Visit
4)	Facility Pre-visit Interview Visit Finalization	14 days before Visit
5)	Facility Visit Visit Report posted	24hrs after Visit
6)	Post Visit Activities Facility uploads Sample Results, Site Precision Data set, Certificate of Analysis	1-10 Days after Visit
7)	Potential Non-Compliance (PNC) Management Address Specification Exceedances Address Test Variation issues – Corrective Action Report upload	10-60 Days after Visit



### **Initial Site Responsibility**

- Site Questionnaire (Oct. 31<sup>st</sup> Previous Year)
  - Facility Checklist safety requirements, security, type, operation, contacts etc.
  - <u>NSOP Document Package available for download during registration</u>

NSOP RFGSA Document Package			
Table of Contents			
1) NSOP Process Timeline			
2) EPA Letter of Introduction			
3) RFGSA Letter of Introduction			
4) NSOP Process Details			
5) Facility Questionnaire			
6) Witnessing checklist			
7) 3 <sup>rd</sup> Party Witnessing Audit			
8) Results – Web Login Process			



## Sampling / Site Visit - "Successful Event"

- RFGSA <u>PM</u> Schedules/Coordinates/<u>Inspector</u> Witnesses
  - Site requirements determined
  - Sampling window based on <u>facility event</u>
  - a batch of certified gasoline/simulated sample
- Sampling /Site visit RFGSA Inspector
  - Min 2 samples/yr. (1 Summer/1winter)
  - -+ 4 samples (2)RFGSA, (1) EPA, (1) COC Transferred to Site (sample)
  - 4 samples for COC before releasing Site Sample
  - <u>Inspector/Auditor</u> stop sampling if sample integrity is jeopardized(ASTM)
    - Sample Transport respective labs within 48hrs.
- RFGSA Inspector AND Sampler same company (<5%)</li>
  - Inspectors not from same office where possible
  - Analysis at alternate lab
  - Avoid COI



#### **Post Site Visit**

- RFGSA Inspector or PM logs in to RFGSA/SWRI Website
  - <u>Inspector</u> completes work that day/evening if possible
    - no later 24 hrs. after sampling
  - Web Form asks for:
    - EPA Site ID, Inspection Date, COC control #, Inspection result (Pass/Fail)
    - Uploads PDF of Inspection form
    - Enters Gasoline specifications for RVP given by <u>Sampler</u>
  - Sample Date triggers 10 business day countdown for results from Site
    - RFGSA Lab has 10 Business Days from Receipt in Lab
  - Inspector PNC Comments
    - Failed Inspection, REFUSAL, Product Not Ready, Site Closed, Etc. (immediate PNC)
      - Resample fees\*



### RFGSA Project Manager(PM) Input Screen Illustration

Site ID	#xxxxYYYYY		
Facility Name	Refinery/Terminal/Marine		
Facility Address	1234 street , City , St, Zip		
Product Owner	Registered RFGSA company name		
Date Visited	MM/DD/YYYY		
Witness Result	Pass/Fail/Refusal		
Gasoline RVP Specification	RVP PSI		
Primary Lab Designation	CCC / SwRI		
Chain of Custody	Chain of Custody upload PDF / Control Number		
Witness Report	PDF upload of final Field report		
Witness Comments	Comments		



## Testing

- RFGSA Samples tested via designated methods
  - Facility/Independent Lab/RFGSA testing "Neat"
    - Sulfur
    - Benzene
    - RVP (Summer)
  - Comparison Test (Method Reproducibility (R)) vs RFGSA
  - <u>Compliance Testing- RFGSA only</u>
    - Hand blend 10vol% Ethanol
    - Sulfur, Benzene, RVP(summer) + distillation characteristics, aromatics, olefins, and oxygenates
- EPA Reporting- 10 business days of receipt in Lab
- PNC's Expedited
  - Sulfur >80 ppm/ RVP > Specification/ Refusals



#### **Method QA Data Review**

#### • QA/QC data submitted by Facility

- Method Used
- Site Precision
  - Provide Data set used for Site Precision (Min 15 points, Max TBD by Method)
- RFGSA Calculates TPI & Precision Ratio
   R/R' & R/r
- Downloadable Website tool
- Upload Inputs Facility Input Screen



## Reporting

- Goal: Confidential Business Information of Participants
- Refiner/Independent lab <u>Sampler/RFGSA Inspector(s) inputs</u>

   reports uploaded on RFGSA website <u>within 10 business days</u>
- Website Reporting:
  - Comparisons of refiner/importer sample vs. RFGSA Inspector sample testing
    - Sample Variations (Neat) > 'R' Sulfur, Benzene, RVP (summer)
  - Compliance (Blended) Sulfur, Benzene, RVP specifications
  - Method QA Data Review
  - Provide online CAR form to address PNC follow-up/closure
- RFGSA Quarterly/Annual Reports Includes QA Review



#### Facility Input Screen Illustration

All values entered must be Neat (Non-Oxygenate blended)

Parameter	Method Used	Neat Result	Units	Reproducibility *
R∨P	ASTM D5191-15 (editable)	7.2	PSI	0.4
Sulfur	ASTM D7039-15a (editable)	14	PPM	r=0.7384·x^0.54
Benzene	ASTM D5769-15 (editable)	0.61	% wt	R=0.221·x^0.67

\*1090.1354—Precision Criteria origin

Required Uploads:

Site Precision Dataset for each Method/Instrument used for submitting results (Excel Spreadsheet)

Requested/Recommended:

Product Certificate of Analysis (PDF)

	Save	
Updioad Support Document (PDF)	Browse Upload PDF file	
	an onset Oprod Por The	
	View Audit View Chain of Custody	



### **Site Responsibility**

- Site has 10 Business days to upload test results
  - Exceeding 10-day Site/Company receives Warning email
  - Exceeding 15-day window PNC to EPA/Company
  - POCs/Members receive notice emails
  - Site uses EPA ID#, Date of inspection, COC control # to access Website
    - (inspector created initial record night of visit)
  - Site enters Test values, Site Precision Dataset for each Method/Inst and uploads COA
  - Site can return to record but cannot change inputs aside from document upload (Add/Replace Document)/ Comment
  - Site can download blank CAR for reference



## **Project PNCs**

- <u>REFUSAL</u> Immediate PNC- all parties notified
  - <u>Inspector</u> revisit within reasonable window AT SITE EXPENSE
- Inspection Failure Immediate PNC -all parties notified
   Inspector revisit within reasonable window AT SITE EXPENSE
- <u>Test Reproducibility Failure</u> PNC
  - All lab results from Site and Inspection must fall within method reproducibility
  - Site Notified, CAR process 60-day response window
- <u>RVP/Sulfur Failure:</u> Immediately after reporting Sample
  - 24 hr notice to EPA / Member by email
- <u>Fuel specification Failure:</u> Immediately after reporting value
  - Test Failure requires immediate Primary Lab retest
    - RVP automatically receives 2 runs, Sulfur>80 receives 2<sup>nd</sup> run
- EPA Notified of PNC status



# QA/QC - Oversight\*

- Independent Auditing (3<sup>rd</sup> party)
- **Field**
- NFSP
- NSOP
  - -Initial program and annual Inspector training (PM/Auditor)
  - -<u>Inspector</u> assessment annually
  - NSOP Consistency (API, RVP, Benzene, Sulfur) Random Audit
    - 2 of the 4 , summer must use RVP Compare both RFGSA Inspection samples\*

#### <u>Labs</u>

- RFGSA/CCC Lab Audit 2/yr per Lab
  - -Lab/17025/Agreed upon procedures
  - -Utilize existing QA/QC includes CAR system

\*Internal oversight



#### **Cost Estimates**

- Fuels Streamlining
  - Assumptions:
  - 2020 NPRM/2020 Est. Pricing/10% Contingency
  - Subject to final rule
- National Fuels Sampling Program (NFSP) <u>Production/Imports</u>
  - Includes Gasoline, E15, Diesel Est. \$ 2.9M
  - Reg. Obligation/Product/Testing \$ <u>Shared OH Expenses</u>
- National Sampling Oversight Program (NSOP) <u>Facilities</u>
  - Based on est. 350 facilities (1000 events) Est. \$4.0M annually
  - Annual cost/registered Facility Est. \$10K
- STATE /AZ Program
  - Estimated at approx. \$210K



#### **RFGSA Website Registration**

- New Registrations <u>Complete No later 8/01/2020</u>
- RFGSA Website (www.rfgsa.org)
  - Login or Create an account
  - Track descriptions
- Registration
  - Gasoline/Diesel/NSOP
  - Ethanol/E15 \*
  - STATE AZ separate state program\*
  - Legacy <u>may</u> only apply if previous RFGSA program participant\*

#### \* Not discussed - Questions contact RFGSA



Programs Downloads

Member Login

Register

Use this link if you or your company are currently, or have in the past, registered in a RFGSA survey compliance program.

Use this link if you or your company are registering with RFGSA for the first time.

#### Programs

RFGSA is an independent not-for-profit trade association. Our program participants (gasoline refiners/importers, ethanol producers/importers, blenders and other obligated parties) form a consortium of companies who have voluntarily chosen an industry compliance option to meet their various Federal and State regulatory fuel compliance reguirements.

Regulations - Federal and State:

Are designed to protect the public health and the environment by improving fuel quality and controlling fuel properties. Clean fuels help reduce harmful emissions from a wide variety of motor vehicles, engines and equipment. The regulations provide for the option of independent compliance organization designed to assist obligated parties with a voluntarily option to participate in EPA/State approved, independent programs offered by RFGSA.

View a summary of all current RFGSA programs below:

U.S. Environmental Protection Agency (EPA)

#### Federal Programs

Fuels Compliance Survey Requirements:

- <u>Regulation of Fuels and Fuel Additives 40 CFR Part 80:</u>
- Reformulated Gasoline Survey §80.68-69
- Ultra-Low Sulfur Diesel Survey §80.613
- Ethanol/E15 Blended Fuels Survey §80.1502

#### State Programs

Arizona Department of Agriculture:

 <u>Arizona Cleaner Burning Gasolines (CBG) Survey —</u> <u>§R20-2-760</u>

#### MEMBER LOGIN

Reporting

Use this link if you or your company are currently, or have in the past, registered in a RFGSA survey compliance program.

#### REGISTER

Use this link if you or your company are registering with RFGSA for the first time.

#### IMPORTANT:

Proposed Fuel Streamlining Regulations — implementation date: January 1, 2021

With the planned FEDERAL GOVERNMENT streamlining regulatory changes scheduled 2021, fuels compliance will undergo a major restructuring. The goals of the proposed Fuel Streamlining regulations: eliminate duplication/unnecessary efforts, harmonize fuel standards, and facilitate program efficiencies to lower overall compliance costs.

The new programs listed below will replace all the current Federal Government Fuels Compliance Programs. The Association on behalf of the fuels industry and program participants will operate two types of voluntary Industry compliance programs.

The National Fuel Sampling Program randomly samples and tests gasoline and diesel fuel at retail service stations throughout the United States and its territories.

The National Sampling Oversight Program will observe gasoline sampling at refineries, tank farms and marine terminals. Each participating facility will be observed with certainty each calendar year.

Until the Fuel Streamlining Regulations are finalized the <u>Fuels</u> <u>Regulatory Streamlining - Discussion Draft</u> can be downloaded in the <u>Downloads</u> section.

For more information for these programs contact <u>Frank.Lenski@rfgsa.org</u>



#### Create a "new" account - steps

- <u>www.rfgsa.org</u>/register
- Create account
- Confirming email confirm account
- Login Member login user ID(your email) and temporary pw
- Log in "Choose Manage My Company Programs" Link takes to enrollment page
- Select Track Participation/Confirm
- Accept Fuels Survey Program Terms and Conditions
- Select Enrollment Resume
- Select Track(s) follow instructions provide inputs
- Save and complete enrollment(s)
- Complete no later than 8/01/2020



#### **Track Descriptions**

- Gasoline Gasoline Refiners/Imports
- Diesel Diesel Producers /Imports
- NSOP Facilities
- Ethanol/E15
  - Ethanol Producers, E15 blenders, site blenders, E15 retail locations
- STATE AZ CBG Refiners /Imports

#### <u>Legacy Programs/Tracks – "historical" participation-closeout</u>

- AZ\* AZ CBG Refiners /Imports
- RFG\* RFG Gasoline Refiners/Importers and Oxy Blenders
- E15/E85\* Gasoline Refiners/Importers of E15 BOB's


#### **General - Registration Details**

- Registered/confirmed account
   Go to: rfgsa.org/Member login
- All Volumes (000's) barrels
- Certification of accuracy
- Track instructions and error messages website
- Gasoline Track automatically enrolls/populates:
  - Diesel Track
  - NSOP Track



## **Gasoline Registration**

- Start with Gasoline Track
- Populate Gasoline/Import Facility info
  - EPA ID#, or Import PADD EPA ID#, Facility Address, Volume
  - Volume = Total FMG all BOB's "grossed up "
  - Prioritized Import PADD facilities
    - Likely Anchorage/Dockage
    - Organized by PADD#
      - Facility Name, City, State, Zip (no EPA ID required)
        - » Don't need actual address (multiple dockage facilities i.e. Linden, NJ) confirmed with <u>PM at event scheduling</u>
- E15 Volume Est. Total U.S. E15 Volume (in 000's barrels)



#### **Program Participation**

#### **Program Participation**

Documents: NSOP Facility RFGSA Document Package

#### (!) You have 7 incomplete enrollments!

**Enrollment Details** 

AZ 2021 INCOMPLETE	NFSP Diesel 2021 INCOMPLETE	NFSP Ethanol/E15 2021	NFSP Gasoline 2021	NSOP Facility 2021	Add Enrollment +
RFG 2021	State/AZ 2021				

AZ - 2021 Legacy Annual Update - Incomplete	NFSP Diesel - 2021 Annual Update - Incomplete
Generated Annual Registration	Generated Annual Registration
Original Enrollment by: John Reese	Original Enrollment by: John Reese
The volume verification documents are missing.	
Resume »	Resume ×
	Enrollment Details
Enrollment Details	
NFSP Ethanol / E15 - 2021 Annual Update -	NFSP Gasoline - 2021 Annual Update - Incomplete
Generated Annual Registration	Generated Annual Registration
Original Enrollment by: John Reese	Original Enrollment by: John Reese
	The volume verification documents are missing.
Resume »	
	Besume



**Enrollment Details** 

# **Gasoline Registration**

FSP GASOLINE 2021 ANNUAL UPDATE	A
You need to certify	your volumes to complete your registration update.
Volumes Your FACILITIES and VOLUME Data:	2021 Estimate Total U.S. E15 Volumes (in 000's barrels) E15
0 C Edit	Volume Certification certifies that NFSP Gasoline track volumes entered are accurate and in accordance with the FSPTC agreement.
Prioritized Import PADD Locations Your Prioritized PADD Location Data:          Prioritized         PADD         Locations         0	



## **Gasoline Volume Inputs**

Your FACILITIES and VOLUME Data:

	EPA Reg ID		Imports		Facility				
Sold	Company	Facility	Company PADD Registration	PADD #	Facility Name	Street Address	City	State	Zip Code

Your FACILITIES and VOLUME Data:									
		(000s barrel/year)							
		2021 estimate							
Production: Includes all "grossed up" Finished Motor Gasoline (FMG) (all BOBs)	Import: Includes all "grossed up" Finished Motor Gasoline (FMG) (all BOBs)	Ethanol: Actual use at oxy blending terminals	Ethanol - Accounted For: Sum of Production plus Import "grossed up" BOB	Ethanol - Not Accounted For: Difference of "Ethanol" and "Ethanol - Accounted For" in Refinery totals					



# **Prioritized PADD Inputs**

Imports       Imports       Facility         Imports       PADD #       Facility Name       Street Address       City       State       Zip Code         Imports       PADD #       Facility Name       Street Address       City       State       Zip Code         Imports       Imports       Facility Name       Street Address       City       State       Zip Code         Imports       Imports       Facility Name       Street Address       City       State       Zip Code         Imports       Imports       Facility Name       Street Address       City       State       Zip Code         Imports       Imports       Facility Place       Facilit
1       1
Instructions for entering your Prioritized PADD Import Facilities for Gasoline. This table is used to enter the Prioritized PADD Import facilities. that can reasonably be supplied by source during the calendar year. By facility please provide: • PADD number • address information for each GASOLINE PRIORITIZED PADD IMPORT supply facility/terminal/operation NOTE: The selected Import PADDS for Prioritized PADD Import Facilities need to be registered as Import Company PADD Registration in the Volumes section.
for Gasoline. This table is used to enter the Prioritized PADD Import facilities. that can reasonably be supplied by source during the calendar year. By facility please provide: • PADD number • address information for each GASOLINE PRIORITIZED PADD IMPORT supply facility/terminal/operation NOTE: The selected Import PADDS for Prioritized PADD Import Facilities need to be registered as Import Company PADD Registration in the Volumes section. To remove a facility, hover over the row number and an X icon will appear. Click the icon. You will be asked to confirm that you want to remove the row.
icon. You will be asked to confirm that you want to remove the row.



# **Diesel Registration**

- Populated by Gasoline NFSP registrations
- No EPA ID required
- Includes on and off road
- Volume in (000's) of barrels
- No Diesel enter 0 and certify



# NSOP Registration Details (1)

- ONLY Gasoline facilities participate
- Populated by Gasoline NFSP registrations
  - Corp, Facility Primary Contacts, Secondary (Optional)
- Exceptions: (Will not participate in NSOP)
  - Inline blending waiver
  - Butane-Pentane blending w/PCG
  - CARB Fuel Exclusively
  - PADD Rail/Truck exclusively
  - No Ethanol Dilution



# NSOP Registration Details (2)

- Manufacturer / Imports
  - Annual (Year Around)
  - Limited (Fixed Seasonal Dates)
    - PADD Registration lead times 30 days
- Seasons
  - Winter1 January 1 to April 30
  - Summer May 1 to September 15
  - Winter2 September 16 to December 31
- Limited Production Schedule
  - Text box for Exception Descriptions



## **NSOP Inputs**

NSOP FACILITY NSOP - 2021 ANNUAL UPDATE	
You need to complete a gasoline enrollment for the pro You need to certify your data to co	
NSOP Facility Data () Your FACILITIES and NSOP Data:	Data Certification certifies that NSOP Facility track data entered is accurate and in accordance with the FSPTC agreement.
	Cancel Save



## **NSOP Facility Inputs**

	Your FACILITIES and NSOP Data:											
	EPA R	leg ID				Facility					Compa	ny POC
	pany	Facility	Company PADD Registration	PADD #	Facility Name	Street Address	City	State	Zip Code	Name	Email	Phone
1												

	Your FACILITIES and NSOP Data:									
NSOP Facility Contacts										
	Primary Fa	cility POC		Secondary Facility POC						
Name	Email	Phone	Cell phone	Name	Email	Phone	Cell phone			

	Your FACILITIES and NSOP Data:										
		Exceptions						Season			
Inline Blending	Butane/Pentane	Rail/Truck Imports	CARB Fuel	No Ethanol	Production/Import	Limited Production/Import	Winter	Summer	Winter 2		
Waiver	Blending with PCG	(Exclusively)	(Exclusively)	Dilution	Operations	Operations Note	01/01 - 04/30	05/01 - 09/15	09/16 - 12/31		

Annual/Limited



#### **Data Management - Summary**

- PNC notice via email
- Login to website <u>www.rfgsa.org</u>
- Choose Gasoline Track/Program
- Sample Worksheet Details
- ACTIONS Respond/Close
- User Options Administration
- Resources



#### You have received a PNC Email Notification

#### Here is a Sample of what it may look like:

To Joe@TestStation.com	
Send Cc	
Send Bcc	
Subject: FW: PNC Notification	
As part of an approved Environmental Protection Agency (Federal/State) Testin	ng Program, new PNC sample(s) have been posted to the RFGSA website.
	.9
One of the following situations has occurred: The test results do not match product specifications or we were not allowed to c	collect a sample
Please go the RFGSA website for further details on this issue.	What does this stuff mean?
What do I do Next? Fuel Survey PNC Help.	First it says to go to the RFGSA website for further details
	Use the Link "Fuel Survey PNC Help" for more Information
SampleId: 10000000 Date Sampled: 3/17/2013 3:00:00 PM	Then it tells you about the sample:
D5599-EtOHVol Ethanol is too high	
Pump Label: Correct Label Ethanol Volume Percent: 10.7	Sample Id Number Date Sampled
Brand: Unbranded	Test Method which caused the PNC (D5599-Ethanol % Volume)
Station Name: TestStation	Pump Label: The Observed Labeling on the Pump
Pump Brand: Unbranded 123 Main Street	Ethanol Volume Percent: The Result of The Test (limit for Gasoline 10.5)
SomeWhere, TX 12345	Brand: Brand of the Station
	Station Name and Address



# Log in to the RFGSA Website

Select the Gasoline Program The PNC Sample Id should be listed on the screen Click "Worksheet" to enter the Sample Worksheet Screen





### **Sample Worksheet Screen**

#### This is where the Photo and Field Origin Report can be viewed As well as entering 'Corrective Actions'

		-						
View Sample List User Optio	ns Downloads	5	- Go		RFG Survey Association	Data Jamie Pollock	Sign Out	Contact Us
Add Action				Wedden				
				Worksheet				
		Looper and the second se		Station History				
Sample Information		Station Information		Dates				
10000000 Analyzed D5599-EtOHVol Correct Label		TestStation 123 Main Street		Period: Tuesday, January 01, 2013 to Sunday, March 3 Collected: Monday, March 04, 2013 3:15 PM	31, 2013			
Open RU 90 Under Canopy:		SomeWhere, TX 12345		Requested: Winter				
				Analysis Summary				
				Analysis Details				
				Actions				
1000000 -Photo.JPG								
<u>View Field Origin Report</u> Download PNC Analysis Details	Only PDF Files are	e allowed.	Upload PTD/other documents (PDF only) What does this stuff mean? Anything <u>Underlined</u> is a link to something else					
			The Field Ori Next, Select Action Support doce	an be viewed to verify it is you igin Report has notes and the ns to enter any information ab suments may be uploaded to v ter for the correct documents	Receipts are av bout how the pro verify the Actions	blem is resolv		
11. 11.								



-RFG

# Actions are seen by EPA

EPA can see what you are doing to correct the problem. Its automatic, You enter comments and they get notified.





## **Close the PNC**

Once all the Actions have been entered, Finalize the process by closing out the PNC. This removes the Sample from the 'Open PNC List', but actions can still be added later. Adding an Action to a Closed PNC will re-Open the PNC.





#### **Sample View – User Options**



Pump Brand: Lightspeed

HACKETTSTOWN, NJ 07840



Lightspeed Oil Company

Gasoline

E10

#### **Administrative Menu**

View Sample List User Options Downloads	▼ Go RFG St					Enter the contact information for the user you want to add		ct Us
	By adding a new user, you grant access to view/update your samples. Please enter all the information below in order to add a new User							)
	Point of Contact:							
	EMail:				1			
	Address:							
	City:							
	State/Province:				Enter the permissions to			
	Postal Code:					program(s)		
	Phone #:							
	FAX:							
	Administrator?	Administrator?						
	Read/View Only Permission?							
Set Users to Read Only. Limits the account. Makes them only able to view information	Grant Permission to Program(s)?  Gasoline Program					formati	king a contact ; the on and permissions t be changed	
			Submit					
	v	ew Progra	m Users for: G	asoline 🔹				
Program Contact E-mail Address	Administrator	Active	Read Only	Entered	i On			
Gasoline Bob Fitz bfitz@ls.com	le la	90		5/8/2012	10:48:00 AM	Edit	Remove from Program	Ł
Gasoline Jon Smith jsmith@ls.com		120	12	12/5/200	6 4:21:00 PM	Edit	Remove from Program	



## **Edit User Permissions**





#### **Program Resources**

- Workshop Presentation API/AFPM/RFGSA websites
- Email PNC to Program Participants
  - Details Issue
  - Independent Help Links
  - Emphasis on "go to Website for Details"
- Available <u>Via Downloads tab</u> worksheet screen
  - Training Vignettes Report Access, Sample action, Managing users
  - Data Filtering
- Non-member PNC response system



#### 2020 RFGSA – Next Steps

- RFGSA Preparations 2020
  - 1<sup>st</sup> Qtr.:
    - NPRM Adjustments/NSOP Website Integration
    - Industry Workshop planning
    - Validate NSOP Registration package
    - Draft Survey Design
  - 2<sup>nd</sup> Qtr.: Final Rule
    - Industry Workshop/Assistance (s) May/(June)
    - Finalize NSOP RFGSA Document package
    - **RFGSA Budgets**
    - BOD Meetings
    - 2021 Registration/Enrollment begins
    - Survey Design updates



# 2020 RFGSA – Next Steps (2)

#### - 3<sup>rd</sup> Qtr.: Ongoing Registrations

- Survey Design plans finalized/submitted
- STR contracts signed
- 4<sup>th</sup> Qtr.: Ongoing Registrations
  - Annual billing by Oct. 1
  - Dues Remittance no later 12/01
  - EPA Escrow letter 12/15
- 1/2021 NFSP/NSOP Implementation
- 2020 Timelines
  - Data
    - Data Transfer/ Reporting/ Website updates
  - PM
    - Operational Procedures Administrative/ Field Training/ Testing/ Data Transfer



#### **Questions ?**

#### • Questions

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