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**RFG Questions and Answers  
Special Update for December 1, 1994**

Fuels and Energy Division  
Office of Mobile Sources  
U.S. Environmental Protection Agency

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Every-batch sampling and testing for averaging parties

**Question:** In the case of RFG oxygenate blenders who blend oxygenate in trucks and who wish to meet the oxygen standard on average, what options are available for establishing the oxygen content of the RFG produced? Specifically, is there any option other than every-batch sampling and testing?

**Answer:** Under § 80.69(b)(4), an RFG oxygenate blender who meets the oxygen standard on average is required to sample and test each batch of RFG produced to determine the batch's oxygen content, and assign a number to the batch for reporting purposes. This every-batch sampling and testing requirement applies regardless of whether the oxygenate blending is carried out in a large terminal tank or through splash blending in trucks.

However, EPA currently is evaluating a proposal for oxygenate blenders that would allow blenders to designate RFG for compliance on average with respect to oxygen content without requiring every batch sampling. Under this proposal, the oxygenate blender would instead maintain records of the oxygenate and RBOB volumes for each batch of RFG produced, the purity of the oxygenate used and the oxygenate requirements for the RBOB, and quality assurance sampling and testing of the RFG produced. The proposed approach would initially be restricted to oxygenate blenders who operate using computer controlled blending operations. EPA intends to issue further guidance with regard to this proposal within the next several weeks.

In the event that an alternative approach to oxygen averaging for oxygenate blenders is allowed, EPA probably would apply this approach to all RFG that is produced during the entire 1995 oxygen averaging period (that includes RFG produced during 1994), including batches produced prior to issuance of the final guidance. Thus the guidance could allow a party to average after the interim period ends, even if the party had been complying on a per gallon basis during the interim period. In the event the guidance is issued, and a party has not collected all information required by such guidance for prior batches, EPA will consider the information that was collected and the certainty it gives regarding the oxygen content of the RFG produced by the party, in evaluating an appropriate enforcement response, if any.

Blending Allowance

**Question:** EPA has previously offered guidance to refiners regarding a "blending allowance" for MTBE in order to meet the requirements of the wintertime oxygenated fuels program. This allowance permits the blending at refineries of MTBE up to 2.9 percent by weight oxygen (instead of the maximum 2.7 percent by weight oxygen allowed under EPA's "substantially

similar" definition), in order to allow for dilution as the gasoline is distributed to terminal and retail stations downstream of the refinery. In separate guidance, recognizing that for some refiners the flexibility to utilize oxygenated fuels program reformulated gasoline (OPRG) in non-OPRG RFG areas is extremely important, EPA has previously stated that OPRG can be utilized in non-OPRG RFG areas. (E.g., regarding minimum pipeline tender sizes, it is often highly desirable for a refiner to ship a single shipment of OPRG to an oxygenated fuels area but to utilize some small portion of this shipment in a smaller RFG area which does not require OPRG.) However, it is not clear that EPA's guidance on blending tolerance and on the use of OPRG in non-OPRG RFG areas allows the use of OPRG blended using the 0.2 percent blending tolerance in non-OPRG RFG areas. Does the blending allowance apply to OPRG when it is used in reformulated gasoline areas that are not part of the wintertime oxygenated fuels program?

Answer: EPA's guidance allowing for the use of OPRG in non-OPRG RFG areas was meant to accommodate the previously issued guidance regarding the 0.2 percent oxygen blending allowance at the refinery. Thus, the 0.2 blending allowance would apply to OPRG RFG regardless of the area where the OPRG is ultimately used.