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**Guidance to Parties Submitting
Mobile Source Air Toxics
Baseline Applications**

Transportation and Regional Programs Division
Office of Transportation and Air Quality
U.S. Environmental Protection Agency

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The general description provided here may not apply to a particular situation based upon the circumstances. Interested parties are free to raise questions and objections about the substance of this guidance and the appropriateness of the application of this guidance to a particular situation. EPA and other decisionmakers retain the discretion to adopt approaches on a case-by-case basis that differ from those described in this guidance where appropriate.

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

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Background: On March 29, 2001, EPA promulgated new regulations setting standards for gasoline toxics performance levels. 61 Fed. Reg. 17230. These new regulations, codified in Subpart J of 40 CFR Part 80, require each refinery and importer to meet refinery/importer-specific compliance baselines for conventional and reformulated gasolines. To determine these compliance baselines, refineries and importers need to apply to EPA for a toxics baseline pursuant to 40 CFR § 80.910. The following guidance applies to any party applying to EPA for such toxics baselines. This guidance deals only with establishment of a baseline. Where necessary, EPA will provide future guidance on other aspects of the Subpart J regulations.

Baseline Application Due Dates: EPA's regulations require refineries or importers seeking to establish toxics baselines to apply by the later of June 30, 2001, or three months prior to the first introduction of gasoline into U.S. commerce by the refinery or importer.

Required Information: Each baseline application must include the following information for each batch of gasoline produced or imported in 1998-2000, and must provide this information separately for conventional gasoline and combined reformulated gasoline and RBOB:

1. Batch ID (Company ID, Facility ID, Report Year, and Batch Number);
2. Volume (gallons); and
3. Applicable toxics value (from Phase II Complex Model results).

Note 1: Batch Reports for gasoline designated by the refinery or importer for use in California are not required to be submitted under the RFG program and should not be included in toxics baseline calculations if such gasoline meets the requirements of 40 CFR § 80.845.

Note 2: Not all RFG/Antidumping batch report (Forms 3520-20C and 3520-20F) information reported to the Agency should be included in the development of toxics baselines. EPA's regulations at 40 CFR § 80.915 provide for calculations of a refinery's or importer's baseline toxics value and baseline toxics volume using the toxics value and volume (gallons) of each batch of gasoline produced during 1998-2000. Although previously certified gasoline, which by definition has already been included in a compliance calculation, should not be counted for purposes of calculating baselines, gasoline added to previously certified gasoline must be accounted for in the toxics baselines. Therefore, the data from only one of the three "Previously Certified Gasoline" batch report forms (Form 3520-20F) - the one checked as "calculated," which represents the gasoline added to the previously certified gasoline - is appropriately included in the computation of baseline toxics value and baseline toxics volume. Gasoline blendstocks are not included separately in baseline calculations, although the gasoline produced through blending of blendstocks is included. Data from batch reports (Form 3520-20C) checked as "blendstocks" (including Gasoline Treated as Blendstock (GTAB) and conventional blendstock) under the RFG/antidumping reporting program should not be included in the calculations of toxics baselines. However, the data for conventional

blendstock as provided in the Equivalent Emissions Performance (EEP) reports for oxygenates blended downstream from a refining facility and included in that facility's baseline compliance reports for 1998-2000 must be included in the toxics baseline calculations.

Note 3: The baseline toxics value and baseline toxics volume, for each type of gasoline (CG and RFG/RBOB), as calculated under § 80.915, must be reported to two decimal places as required by § 80.915 (e).

Electronic Submission Guidance: In order to make submission of the data as easy as possible for both reporting parties and EPA, we will accept information in electronic format using any of the major spreadsheet software applications available. These include Microsoft Excel, Corel Quattro Pro, or Lotus 123. To further simplify electronic submission, we have developed spreadsheet templates in several different versions of these software packages. These spreadsheets are available on EPA's Web site at: <http://www.epa.gov/otaq>. If you have any problems utilizing the spreadsheet format, please contact the EPA staff person listed below.

Spreadsheet files should be named by the 5-digit EPA facility ID preceded by "MSAT" (e.g., an Excel file for facility ID 54321 should be named "MSAT54321.xls"). If a company chooses, all facilities for that company may be included on several pages of the same spreadsheet. If you use this approach, the spreadsheet pages should be named using the facility ID and the filename should be the 4-digit company ID preceded by "MSAT" (e.g., a Lotus spreadsheet file using such an approach for company ID 4321 should be named "MSAT4321.123").

Spreadsheets submitted as electronic files should be provided on 1.4 megabyte floppy disks along with a letter from the appropriate corporate officer as described in the regulations at § 80.910(c)(3). The letter should reference, by name and EPA RFG/anti-dumping program reporting number, the facilities covered by the data on the electronic disk and include the other information required in section § 80.910(c). If you have already submitted your baselines, you will be contacted if any change in format or additional information is needed.

EPA Contact:

John Weihrauch
(202)564-9477
Fax: (202)565-2085
Email: weihrauch.john@epa.gov

If sent by U.S. mail, the toxics baseline request should be sent to:

U.S. EPA
Attn: Toxics Program (6406J)
1200 Pennsylvania Ave. NW
Washington, DC 20460

If sent by an overnight or courier service, the toxics baseline request should be sent to:

U.S. EPA
Attn: Toxics Program - John Weihrauch
501 Third Street, NW
Washington, DC 20001
Phone: (202)564-9477