
National Renewable Fuel Standard Program Product Transfer Documents (PTD)

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Office of Transportation and Air Quality
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Introduction

- What is a Product Transfer Document?
- How are RFS1 & RFS2 RINs identified on a PTD?
- What information is required on a Product Transfer Document?
- How are Product Transfer Documents identified in EMTS?

What is a Product Transfer Document?

- A Product Transfer Document (PTD) is the commercial document where renewable fuel and RIN ownership are transferred between parties.
- In order to complete an EMTS RIN transfer, specific buy and sell transaction data elements must match. Pursuant to 80.1453, PTDs are required to contain specific RIN identifying information in order to ensure transaction matching occurs in EMTS.
- A PTD is used to transfer ownership of renewable fuel and RINs (assigned and separated).
- While EMTS buy and sell transactions contain an optional PTD field for a user specified PTD number, EMTS does not generate PTD numbers nor does EMTS match on the PTD number data element.

How are RFS1 & RFS2 RINs identified on a PTD?

RFS1 RINs must be recorded in their entirety (38-digit numeric code) on a Product Transfer Document when transferred. (similar to RFS1 rules)

RFS2 RINs may be transferred generically or uniquely. The transfer method will determine what information must be submitted to EMTS.

What information is required on a Product Transfer Document?

Generic trading RFS2 (EMTS)

RINs example:

- Transaction Date: 7/1/2010,
- Sell to Company: X; Company ID: CCCC
- Renewable Fuel: 10,000 gallons of ethanol
- 10,000 RINs: D=6 Assigned 2010 RINs
- Reason: Standard Trade

Unique trading RFS2 (EMTS)

RINs example:

- Transaction Date: 7/1/2010,
- Sell to Company: X; Company ID: CCCC
- Renewable Fuel: 10,000 gallons of ethanol
- 10,000 RINs: D=6 Assigned 2010 RINs
- Reason: Standard Trade
- RIN Generator Company ID: CCCC
- RIN Generator Facility ID: FFFFF
- RIN Batch Number: XXXXX

How are Product Transfer Documents identified in EMTS?

Required EMTS PTD data element: Pursuant to 80.1452(c)(7) and 80.1453(a)(4), the date of transfer specified on the PTD is the transfer date in EMTS. The transfer date sent to EMTS must match for both buyer and seller in order for RINs to be properly transferred.

Optional EMTS PTD data element: EMTS provides an optional PTD number data field for buy and sell transactions

Additional information

- Pursuant to 80.1454, all parties must keep all product transfer documents for at least 5 years.
- Pursuant to 80.1428(a)(6), any transfer of ownership of assigned RINs must be documented on a PTD and transferred at the same time or within the same day as the PTD that transfers ownership of renewable fuel.
- Pursuant to 80.1429(d), any transfer of separated RINs must be documented on a PTD.
- Pursuant to 80.1429(e), any transfer of renewable fuel volume after separation of RINs must be documented on a PTD.
- A seller of RINs that does not provide a buyer with a PTD in a timely manner may be in violation by causing the buyer to violate the EMTS submission deadline (80.1460(e)).

Overview

- Product Transfer Documents are still required in RFS2.
- EMTS has an optional data element for buyers and sellers.
- EMTS does not generate Product Transfer Documents.



Questions?



■ For Additional information:

<http://www.epa.gov/otaq/fuels/renewablefuels/index.htm>

- Includes Factsheets
- RFS2 Rulemaking Package
 - Preamble
 - Regulations
 - Regulatory Impact Analysis
- Links to Other Information
- Frequently Asked Questions

■ Send new questions to: EPAFuelsPrograms@epa.gov