

## Regulatory and Compliance Requirements for Transportation Fuels



**Trinity Consultants** is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

Transportation fuel producers, importers, marketers, distributors, and blenders must comply with a multitude of regulatory requirements set forth by the U.S. Environmental Protection Agency (EPA) and state agencies. These requirements can vary from state to state and the point at which the fuel is in the distribution system. Federally, fuel producers and blenders must comply with regulations that apply to conventional gasoline and diesel fuels as well as with the federal Renewable Fuel Standard (RFS), and Canadian Renewable Fuels Regulations.

The state of California imposes its own requirements on gasoline and diesel fuel producers, blenders, marketers, and distributors in addition to other regulatory programs focused on renewable fuels. These include the Alternative Diesel Fuel (ADF) regulation, adopted by the California Air Resources Board (CARB) in 2015, which requires parties that produce, blend, or distribute diesel fuel substitutes (e.g., biodiesel) to submit annual reports and mitigate NO<sub>x</sub> emissions from biodiesel blends. In addition, the ever-changing Low Carbon Fuel Standard (LCFS), first adopted in 2009 and most recently amended in 2019, requires transportation fuel suppliers to reduce the carbon intensity of their fuels by substituting alternatives for conventional gasoline and diesel. The LCFS also includes detailed fuel certification, reporting, third-party verification, and recordkeeping requirements. Further complicating compliance is the fact that transportation fuels sold in California are also subject to CARB's Greenhouse Gas Reporting and Cap-and-Trade regulations. Similar but different programs apply in other states including Oregon and provinces in Canada.

Given the complexities, compliance with fuel regulations requires an informed and in-depth knowledge of all of the pertinent federal and state regulations. Trinity's fuel specialists have this expertise and provide a wide range of services related to transportation fuel regulations to clients such as refineries, biofuel producers, bulk fuel traders, third-party resellers, importers, and distributors. Our experienced staff assists clients from the point of regulatory development to compliance with regulatory requirements. With respect to the former, we attend public workshops, produce digests of regulatory requirements and actions, and assist clients in drafting comments and testimony on proposed regulations and amendments.



In addition, we provide expert technical support to clients involved in litigation challenging new or amended regulations as well as in government enforcement actions and relevant commercial disputes.

### Fuels Regulatory and Compliance Services

#### Federal and state gasoline program compliance

- Sulfur and benzene reporting
- California fuel certification and producer requirements
- Imports reporting in U.S. and Canada
- State fuel distributor and blender registration
- Bulk terminal fuel handling
- Pipeline fuel specifications

#### Renewable Fuel Standard compliance

- Renewable Volume Obligation (RVO) calculations
- Independent third-party engineering reviews
- Pathway determinations, including efficient producer pathways

#### Federal GHG reporting requirements

- System registration and GHG report filing
- Compliance analysis for importers and bulk fuel purchasers

#### CARB's Low Carbon Fuel Standard compliance support

- Renewable fuel market research and analysis
- General and design-based fuel pathway applications and life cycle analysis
- LCFS quarterly report preparation and internal report audits
- Credit calculations and economic analysis
- Third-party verification of fuel pathways, petroleum projects and quarterly/annual reports
- Provide support with CARB's Alternative Diesel Fuel regulation

- Quarterly ADF report preparation
- Regulatory cost analysis and research
- Assist with California Cap-and-Trade requirements
- Mandatory Reporting Rule report preparation
- Compliance status assessment
- Benchmark and allowance allocation calculations
- AB 32 third-party verification services

### Miscellaneous support

- CVS monthly newsletter<sup>1</sup> covering all California regulatory events and activity related to fuels and mobile sources (available by subscription)
- Customized updates on all new federal and state regulatory activity (workshops, workgroup meetings, panel meetings, public meetings, Board hearings, seminars etc.)
- General education and training services to fuel producers, importers, marketers, distributors, and blenders
- Assistance with written and verbal communications with regulatory agencies and enforcement

### Why Choose Trinity

In short, there's no better choice for your fuel regulatory compliance services. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

*ISO 9001:2015 certified at our corporate office in Dallas, Texas*

#### CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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<sup>1</sup> A Copy of CVS News can be provided upon request.