dumping program is to improve air quality in ozone non-attainment areas by reducing motor vehicle emissions of toxic and tropospheric, ozone-forming compounds, as required by § 211(k) of the Clean Air Act ("the Act"). Final regulations for RFG and anti-dumping were signed by the Administrator on December 15, 1993 and were published in the **Federal Register** on February 16, 1994.1 In order to ensure that the requirements of the RFG and antidumping program are complied with (and as a tool for monitoring such compliance), the regulations include, at §§ 80.75 and 80.105, reporting requirements for refiners, importers, and oxygenate blenders. In addition to these parties, independent labs must report the result of analyses of RFG and reformulated gasoline blendstock for downstream oxygen blending (RBOB) to EPA. Interested persons who require further information about the specific reports to be filed should refer to §§ 80.75 and 80.105.

Reporting parties are required, under \$\ \\$\ 80.75\$ and \$0.105\$, to submit all RFG and anti-dumping compliance reports via forms and procedures specified by the Administrator. PPA has developed and provided scannable paper forms and copies of these forms are available from the person(s) listed in FOR FURTHER INFORMATION CONTACT, above.

Purpose of Electronic Filing

EPA desires to decrease, to the extent possible, the amount of paper forms

required to be submitted under the RFG and anti-dumping program and to permit the submission of reports electronically. Electronic Data Interchange (EDI), is the transmission, in a standard syntax, of unambiguous information between computers of independent organizations and has been widely used by the private/commercial sector. EPA believes that the electronic transmission and receipt of RFG and anti-dumping compliance reports will simplify the flow of reports from the reporting entity to EPA and will lessen the need for the reporting party and EPA to "re key" data in order to fit the EPA paper form. By eliminating extra steps in the reporting process, reporting via EDI will reduce the chance of human error and will help ensure the accuracy of reports filed with EPA.

How the EDI Reporting Program for RFG and Anti-Dumping Will Work

The Administrator will accept RFG and anti-dumping reports filed via EDI in substitution for paper reports, provided the reporting party signs and abides by the provisions of the "Terms and Conditions Memorandum for Submission of Reformulated Gasoline (RFG) and Anti-Dumping Reports via Electronic Data Interchange (EDI). (This memorandum, the entire text of which appears in Section III below, explains the responsibilities of the reporting party.) EPA will also provide reporting parties with copies of the technical guidance document titled 'Reformulated Gasoline and Anti-**Dumping Program Electronic Data** Interchange Technical Guideline, which includes detailed information about hardware/software requirements, the required usage of data standards, the value added network (VAN) service EPA will use to receive data, and system description. [Copies of this guidance will be sent to reporting parties and other interested parties and may be obtained from the TTNBBS or by contacting the person(s) listed in FOR **FURTHER INFORMATION CONTACT.**

EPA, and the reporting party who has signed the Terms and Conditions Memorandum, may electronically transmit to or receive from each other any of the transaction sets for the RFG and Anti-dumping program. EPA will identify in the guidance document, a Value-Added Network (VAN), which provides a mailbox from which EPA may send or receive EDI transmissions. As explained in the Terms and Conditions Memorandum, reporting parties may use, at their own expense, this "EPA VAN" or may select another VAN interconnected with the EPA VAN.

EPA and the reporting party must protect electronic data and Personal Identification Numbers (PINs) from unauthorized access, alteration, loss, destruction and/or disclosure to ensure, at a minimum, the same level of protection required for paper documents. This protection must extend beyond the transactions themselves to any files or data bases that contain information conveyed via EDI.

EPA will use a "dual PIN" system. A responsible corporate officer of the reporting party will identify authorized representatives (i.e., corporate employees who are authorized to submit RFG and anti-dumping reports) and the facilities for which such authorized representatives are authorized to submit reports. A responsible corporate officer (see footnote 3 to the Terms and Conditions Memorandum), is the only person who will be sent a company PIN by EPA. The company PIN will be mailed directly to the responsible corporate officer via U.S. Postal Service by EPA. The individual PIN (i.e. the PIN assigned to each authorized representative) will be mailed directly to such authorized representative(s) via U.S. Postal Service by EPA. Both the individual PIN and the company PIN must appear on all proper EDI submissions. Each PIN will be a four (4) character alpha-numeric code. EPA does not intend to routinely change PINs, but will do so at the written request, on company letterhead, of a responsible corporate officer of the reporting party. The reporting party is responsible for notifying EPA if it has reason to believe the security of any PIN(s) has been compromised and must request a change. The reporting party is also responsible for notifying EPA in writing and on company letterhead of termination of employment of any authorized representative. EPA will cancel such authorized representative's individual PIN within fourteen (14) business days of receiving such notice. The reporting party is responsible for notifying EPA (in writing on company letterhead and signed by a responsible corporate officer) of any new employee(s) who will act as authorized representative(s). EPA will promptly issue such authorized representative(s) individual PIN(s) via U.Ŝ. Postal Service. If EPA has reason to believe that PIN security has been compromised, it may initiate PIN changes.

EPA will consider an electronically filed report received when it is accessible to the receiver (i.e. EPA) at its receipt computer. No document shall satisfy any reporting requirement until it is received. Upon receipt of any

¹ EPA published a direct final rulemaking making technical corrections to the February 16 rule in the July 20, 1994 Federal Register. A rulemaking related to renewable oxygenates was published in the August 2, 1994 Federal Register. Shortly after promulgation of the renewable oxygenates rule, the American Petroleum Institute (API) and National Petroleum Refiners Association (NPRA) brought suit in the United States Court of Appeals seeking review of the Agency's action. On February 16, 1995, oral arguments were held. On April 28, 1995, the Court granted API and NPRA's petition for review and concluded that EPA lacked the authority to promulgate the renewable oxygenate rule. Interested parties may contact the person(s) listed in FOR FURTHER INFORMATION CONTACT for information about the status of technical corrections and the renewable oxygenate rule.

² On November 4, 1994, authority to require reporting of information and delivery of records required to be maintained under specified sections, including §§ 80.75 and 80.105, was delegated by the Administrator to the Assistant Administrator for Air and Radiation and the Assistant Administrator for Enforcement and Compliance Assurance. On November 28, 1994, certain authorities, including those related to reporting under §§ 80.75 and 80.105, were further delegated by the Assistant Administrator for Air and Radiation to the Director of the Office of Mobile Sources.

On December 2, 1994, authority was further delegated to the Director of the Field Operations and Support Division of the Office of Mobile Sources, which is the office responsible for day-to-day operations of the RFG and Anti-Dumping reporting program.