



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 26 2007

ASSISTANT ADMINISTRATOR
FOR ENFORCEMENT AND
COMPLIANCE ASSURANCE

Dawn Carlson, President
Petroleum Marketers & Convenience Stores of Iowa
1301 50th Street
West Des Moines, Iowa 50266

Dear Ms. Carlson:

I am writing in response to your letter to Mr. Karl Simon of the U.S. Environmental Protection Agency, regarding reporting under the renewable fuels (RFS) program, which was received by EPA on November 16, 2007. No later than November 30, 2007, regulated parties are required to submit to EPA reports on RFS activities that occurred during September, 2007. You have requested that EPA allow additional time to submit this first report, until February 28, 2008. For the reasons described below, I am granting your request.

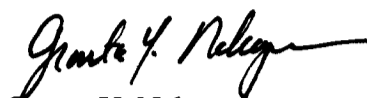
As you know, on May 1, 2007, EPA promulgated regulations on the RFS program, at 40 C.F.R. §§ 80.1100 through 1167. See, 72 Fed. Reg. 23900. The RFS requirements, which began on September 1, 2007, apply to parties that produce or import renewable fuel or gasoline, parties that transport or blend renewable fuel, and parties that own renewable fuels credits, also known as renewable identification numbers (RINs). The RFS program also requires these regulated parties to submit periodic reports to EPA demonstrating compliance with the RFS requirements and standards. One such periodic report is a quarterly report on renewable fuel volumes and RIN transactions, which must be submitted two months following the end of each quarter. 40 C.F.R. §§ 80.1152 (c) and (d). For 2007, the third quarter report consists of renewable fuel volumes and RIN transactions only for the month of September, 2007. Nevertheless, this report must be submitted to EPA by November 30, 2007.

You have expressed concern that because EPA only recently approved the forms for these requirements, some parties will have difficulty submitting the RFS quarterly report for the third quarter of 2007 on time. As a result, you have asked that EPA exercise its enforcement discretion to provide regulated parties additional time in which to submit this report.

Based on the foregoing, and as a matter of enforcement discretion, EPA will allow additional time for regulated parties to submit third quarter 2007 renewable fuel volume and RIN transaction reports under 40 C.F.R. §§ 80.1152 (c) and (d), provided that these reports are submitted to EPA no later than February 28, 2008.

Information on RFS reporting forms and procedures can be found at www.epa.gov/otaq/regs/fuels/rfsforms.htm. If you have any questions regarding this matter, you may call Erv Pickell, Fuels Team Leader, at (303) 236-9506.

Sincerely,

A handwritten signature in black ink, appearing to read "Granta Y. Nakayama", with a long horizontal flourish extending to the right.

Granta Y. Nakayama
Assistant Administrator