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Fairfax, VA 22030
Phone: 703-279-6434
Fax: 703-591-3049
E-mail: Frank.Lenski@rfgsa.org
Website: www.rfgsa.org

Frank C. Lenski
President

Dear Station Owner/Operator/Attendant:

The Reformulated Gasoline Survey Association (RFGSA) represents a consortium of refiners, producers, blenders, importers and fuel distributors of cleaner burning, reformulated fuels and ultra-low sulfur diesel fuel. In order to satisfy Clean Air Legislation (at the federal, state or local level) and meet various environmental requirements/manufacturer specifications in your area, RFGSA develops and conducts various fuel survey programs on behalf of its members/program participants.

Southwest Research Institute (SwRI) has been contracted by RFGSA to procure and test fuel samples from randomly selected service stations. The individual presenting this letter is an independent contractor for SwRI and is only involved in collecting and shipping the fuel samples to SwRI. He/She is not employed by the US Environmental Protection Agency (EPA) or any other environmental enforcement organization.

The samples will be purchased and pumped into aluminum bottles, which are approved containers for fuel storage and shipment. Attached to each bottle is a tag, which identifies your station brand, address, time period for sample collection and grade of product to be collected. Feel free to inspect the bottles and observe the sample collection process. All official product sampling will be done in a manner that meets or exceeds industry standards. Please note that our sample collection procedure disposes of the hose residual which allows us to procure a valid sample without pumping a large volume.

As part of these government-approved programs, you may later be contacted by SwRI (by phone) to verify information about the last three fuel deliveries prior to the date of sample collection (today). This information is found on the Product Transfer Document (PTD) or Fuel Invoice. The verification will include: 1) date of each delivery, 2) Terminal and/or shipment origin and 3) the ethanol content in the gasoline (vol%). Dealers are requested to maintain the PTD records at each retail site.

In the event a fuel sample collected from your station or the pump labeling does not meet federal requirements: An immediate action may be required at the station. Your fuel supplier or the testing laboratory contractor will contact you with important information about the situation.

Please note that all sample test results and all refusals to allow sample collection are reported to EPA

Retailers may obtain the analytical test results for their station by providing the following on company letterhead: brand and address of station tested, grade tested, date and time of sample collection, name of a contact person with phone number / fax number and e-mail address. A \$150.00 administrative fee (cashier's check or money order) must be included for processing. These requests should be forwarded to Frank Lenski, President, RFG Survey Association, 11350 Random Hills Road, Suite 800, Fairfax, VA 22030, Phone: (703) 279-6434. The results will be reported to the retailer within 5 business days after survey submission. For more information about RFGSA, please visit our website at www.rfgsa.org

Programs: <http://www.rfgsa.org/programs-list.htm> FAQs: <http://www.rfgsa.org/faq.html>

Date: _____/_____/_____ Time: _____:_____ AM _____ PM

Sample Id: 1228118
WO#: Z-100.01

Sample Collector: 100787 Sampler's Name

Station: 123 Main Street
SOMEWHERE, TX 78200
NIM#: 330346057



Lab: Southwest Research Institute, 6220 Culebra Road, San Antonio, TX 78238
Contact: Jamie Pollock, 210-522-5853 jamie.pollock@swri.org



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

DEC 12 2013

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Dear Fuel Retailer:

The United States Environmental Protection Agency's (EPA) fuels regulations, issued under the Clean Air Act, are designed to protect public health and the environment by improving fuel quality and controlling fuel properties. Clean fuels help reduce harmful emissions from a wide variety of motor vehicles, engines, and equipment. These programs provide for compliance surveys that are designed to assess compliance with fuel quality and pump labeling requirements. These programs are: the reformulated gasoline (RFG) program, the ultra low sulfur diesel fuel program, and the E15 (ethanol blended fuels) program. *See* the EPA website links below for more information:

Reformulated Gasoline Survey: <http://www.epa.gov/otaq/fuels/gasolinefuels/rfg/index.htm>

Ultra Low Sulfur Diesel Survey: <http://www.epa.gov/otaq/fuels/dieselfuels/index.htm>

Ethanol Blended Fuels Survey: <http://www.epa.gov/otaq/regs/fuels/additive/e15/index.htm>

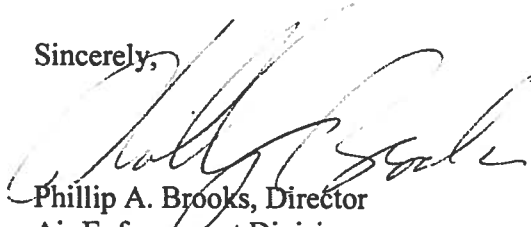
If your facility sells gasoline or diesel fuel, you may be approached by representatives of Southwest Research Institute (contractor) who perform inspections for the RFG Survey Association, Inc. (Survey Association). The Survey Association is paid by an industry consortium to take the samples and test them. Depending upon your location and random sampling, you may be approached more than once in the course of a year or not at all. The contractor will purchase samples of fuel, examine and photograph pump labels, and ask for some basic information about the station. The sampling process will be just like any other sale of fuel, and providing the information requested should take very little time.

The sample(s) the contractor collects will be analyzed to determine if the fuel meets the applicable standards. If test results are found to be outside of the legal limits, the contractor will inform your distributor and the refiner whose brand name is displayed at your outlet, if applicable. In this situation, your distributor or refiner will request that you stop selling fuel from the sampled storage tank until the fuel in the storage tank is corrected to meet the applicable standards. Your distributor or refiner may also investigate to determine how the fuel became noncompliant in order to implement improved procedures to prevent future problems. If you are not supplied by a company that is part of the manufacturer's consortium, the Survey Association will notify you directly of the results of its inspection. If you are notified that your fuel is found to be outside the legal limits, the EPA strongly recommends that you immediately shut down the fuel pumps and correct any non-compliance along with the conditions that may have caused it. You should document your actions taken to correct any potential violation.

Successful completion of these compliance surveys with the help of all parties concerned will help to prevent the misfueling of vehicles, engines, and equipment, and help protect the environment. You are strongly urged to cooperate with this effort.

If you have questions about the survey program, please contact Jeffrey Kimes of my staff, at 303-312-6445, or email at kimes.jeffrey@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip A. Brooks". The signature is fluid and cursive, written over the printed name.

Phillip A. Brooks, Director
Air Enforcement Division
United States Environmental Protection Agency



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Independent Fuels Compliance Since 1995

Dear Station Owner/Operator/Attendant:

RE: RFGSA – E15 Compliance Survey Program – General Labeling Guidelines

The Reformulated Gasoline Survey Association (RFGSA) represents a consortium of refiners, producers, blenders, importers and fuel distributors of cleaner burning, reformulated fuels and ultra-low-sulfur diesel fuel. In order to satisfy Clean Air Legislation (at the federal, state or local level) and meet various environmental requirements/matrix specifications in your area, RFGSA develops and conducts fuel survey programs.

On behalf of participating, obligated parties under the E15 rule, the Association conducts the EPA Approved – E15 Compliance Survey Program. **The survey program is required to conduct a nationwide survey of retail stations to help ensure compliance with labeling, oxygen content and RVP requirements of the rule.** The findings are then reported to EPA and participating companies.

Attached for your review, are the general labeling guidelines that EPA has approved for non-flex fuel locations utilizing on-site blender pumps. It is important that you review this information to ensure your location meets these requirements.

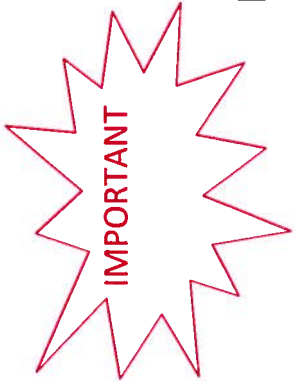
Additional information about the RFGSA E15 Compliance Survey Program and labeling guidelines can be found on the RFGSA website www.rfgsa.org, or the EPA website www.epa.gov/otaq/regs/fuels/additive/e15/documents/rfa-model-e15-misfueling-mitigation-plan.pdf.

If you have any questions, please feel free to contact your representative trade association or your fuel supplier.

Thank you in advance for your participation in the E15 Compliance Survey Program!

Please Note: This information should not be considered as legal advice or as a substitute for developing specific company operating guideline. RFGSA does not make any warranty, expressed or implied, or assume any legal liability concerning statements or information presented in this document.

General Labeling Guidelines for Non-Flex E15

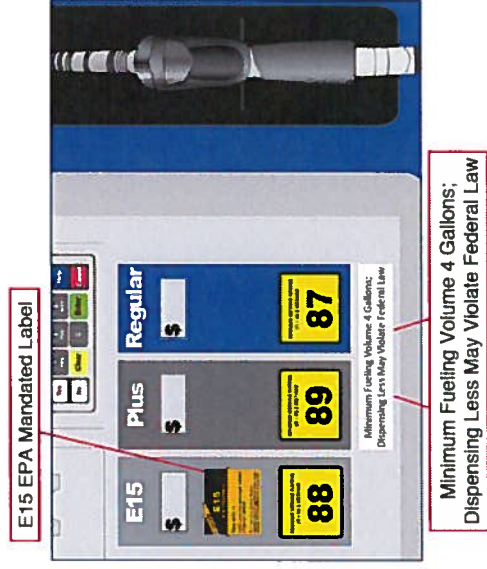


Method 2

Single Hose with Multiple Products

EPA Approved*

Single-Hose Dispenser for E10/E15



This configuration only allows E15 to be dispensed from a hose where E10 or “No Ethanol” fuel is available and **ONLY WITH A LABEL WARNING CUSTOMERS THAT THE FIRST FEW GALLONS MAY HAVE A HIGHER ETHANOL CONCENTRATION THAN EXPECTED**



Method 1

Dedicated E15 Hose

EPA Approved*

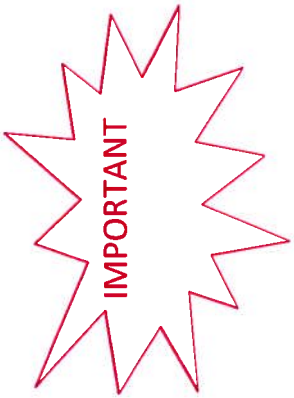


This configuration prevents E10 and E15 customers from receiving Ethanol concentrations higher than expected.

* EPA Approved MMP [Misfueling Mitigation Plan ; June 15,2012]

Get Labels for non-Flex E15 at: <http://www.opisnet.com/market/decals-ethanol.asp>
RFA is making the EPA’s E15 label available, email: ikracher@ethanolrfa.org or contact the RFA at (402) 391-1930.

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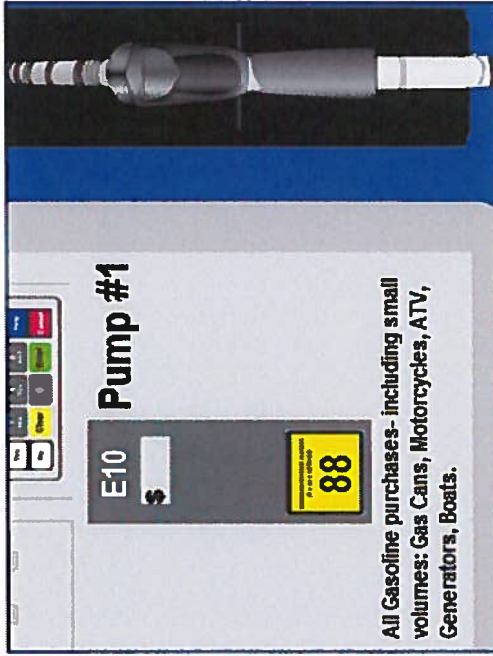


General Labeling Guidelines for Non-Flex E15

Method 2A

Pump #2 : Single Hose E15 with E10

Pump #1 : Separate E10 which does not share hose with ethanol blends
(label describes small volume purchases at specific location)



* EPA Approved MMP [Misfueling Mitigation Plan ; June 15,2012]
Get Labels for non-Flex E15 at: <http://www.opisnet.com/market/decals-ethanol.asp>
RFA is making the EPA's E15 label available, email: ikracher@ethanolrfa.org or contact the RFA at (402) 391-1930.
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