

April 16, 2020

We have received questions regarding the letter dated March 31, 2020, related to enforcement discretion for RVP and volatility class requirements for gasoline in Arizona (attached). The letter did not specifically provide enforcement discretion for the RVP and volatility class requirements for Arizona Cleaner Burning Gasoline (CBG) since the RVP requirements for CBG include a maximum RVP of 9.0 psi from October 1 through May 31** at retail locations. Because the CBG RVP did not change in April or May, CBG did not face the same supply issues due to decreasing RVP standards in those months. Included in the letter was the following information specific to Arizona CBG, which stated:

"This action **DOES NOT** allow regulated parties to supply, transport, or sell conventional gasoline in the CBG-Covered Area. Additionally, this action **DOES NOT** allow Registered Suppliers to produce and supply gasoline exceeding the RVP standards set by the pipeline schedule nor does it allow changes in the pipeline schedule to allow higher RVP gasoline to be supplied past the pre-existing schedules."

We have received questions regarding enforcement of the 7.0 psi RVP standards effective at retail locations in the CBG-covered area beginning June 1. This is to inform you that we are continuing to monitor the transition to the lower RVP in the CBG-covered area. Per the pipeline schedule, shipment of AZRBOB meeting the summer RVP requirements (product codes X9 and Z9, 5.7 psi RVP) has begun for the transition to summer gasoline. The pipeline requires 5.7 psi RVP AZRBOB to be shipped cycle 15 on the west line and cycle 16 on the east line (see Section 2, Product Code Requirements, Cycle by Cycle at: https://www.kindermorgan.com/pages/business/products_pipelines/pacific_specs.aspx).

With continuing decreased gasoline demand, we anticipate that the transition at the retail level will take longer than normal. We will be in communication regarding these requirements in the near future. In the meantime, if you have any questions or comments, please do not hesitate to contact us at dwm@azda.gov.

Thank you,

Michelle Wilson
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** A.A.C. R3-7-751(A)(6) allows a maximum RVP of 10.0 psi at retail locations; however, the pipeline RVP limit does not increase in April, so in practice the CBG-covered area has a maximum RVP meeting 9.0 psi.