

CERTIFIED NTDF (Non-Transportation Diesel Fuel)

Buckeye Partners, L.P. Guidance for NTDF Redesignation

Beginning January 1, 2021, Ultra Low Sulfur Heating Oil (ULSHO) and Ultra Low Sulfur Kerosene (ULSK) receipted into Buckeye Terminals or Buckeye Pipeline assets shall also be designated as “Certified NTDF” pursuant to EPA’s Renewable Fuel Standard (40 CFR §80.1400).

Buckeye will ticket all inbound and outbound movements of ULSHO and ULSK as “Certified NTDF” and appropriate EPA NTDF language will be included on all Product Transfer Documents (PTDs).

Rebranding Allowances

Customers wanting to rebrand/redesignate/regrade ULSD to NTDF ULSHO (or ULSD1 to NTDF ULSK) may do so, as they have in the past.

Customers wanting to rebrand/regrade/redesignate NTDF ULSHO to ULSD (or NTDF ULSK to ULSD1) may do so with the understanding that they are solely responsible for complying with all EPA requirements associated with these types of regrades, including but not limited to:

- EPA registration as a refinery at each facility where redesignation occurs pursuant to §80.76.
- All balance calculating requirements in §80.1408, and RVO calculations in §80.1407.
- The reporting requirements of §80.1451(a)(1)(xix) and §80.1451(i).
- The recordkeeping requirements of §80.1454(o) and §80.1454(t).
- The attest engagement requirements of §80.1464 and §80.1475, as applicable.
- Parties that incur a RVO (renewable volume obligations) must comply with all applicable requirements for obligated parties (RIN credit obligation).
- The product transfer document requirements of §80.1453 (Unless Buckeye is responsible for providing T4 ticket or truck/rail BOL).

Although Buckeye will allow for these redesignations as requested by the customer, it is the responsibility of each customer (product title holder) to comply with all EPA requirements.

Specifications

Buckeye Quality Specifications for ULSD and NTDF ULSHO are identical and compatible, as are the specifications for ULSD1 and NTDF ULSK. Please see Buckeye Shipper Notebook for Marine Terminal (Section 7.1 Table I) and Pipeline (Section 6.3 and 6.5) specifications and grades for NTDF fuels.

Co-mingling

The new RFS standard indicates that ULSD can only be comingled with ULSHO if the ULSHO is designated as Certified NTDF. To allow for Buckeye to comeingle ULSD with ULSHO, as well as ULSD1 with ULSK, Certified NTDF designations are required inbound to Buckeye facilities. ULSHO that is not designated as NTDF shall not be comingled with ULSD.

Customer requests for ULSHO or ULSK to be receipted into terminals without the Certified NTDF designation will be considered on a case-by-case basis, but customers must have segregated tank leases and no comingling with NTDF or ULSD barrels is permitted.