



California Natural Gas Vehicle Coalition

March 8, 2013

Annette Hebert
Chief Mobile Source Operations Division
California Air Resources Board
9480 Telstar Avenue, Suite 4
El Monte, CA 91731

Re: CARB's Alternative Fuel Vehicle Conversion Certification Program

Dear Annette:

The California Natural Gas Vehicle Coalition appreciates the time and effort the Air Resources Board put into the working group calls and the workshop in El Monte in January. Simplifying and improving the alternative fuel conversion certification program is a top priority for our organization. The time and expense involved in complying with the Air Resources Board's (ARB) certification program is a significant obstacle to getting more clean alternative fuel vehicles onto California roads.

As we commented to you and more broadly in our newsletter our members felt pretty good about the direction in which the ARB was moving on this issue coming out of the January 22 workshop. However the letter we received a couple weeks later responding to our suggested changes to the On Board Diagnostics portion of the program left us feeling much less positive. That said we are still motivated to work with you to make this program simpler and more practical without sacrificing air quality.

This letter is intended to be an overview of the concerns and suggestions the California Natural Gas Vehicle Coalition and our members have raised. Individual companies will provide more detailed and technical suggestions to ARB. CNGVC is asking the Air Resources Board to: simplify the on-board diagnostics (OBD) testing requirements, simplify the reporting requirements for the testing that is done, simplify the application process to enable a speedy transition from an alternative fuel vehicle original equipment Executive Orders (EO) to an aftermarket EO, extend the life of EOs, allow the use of commercially available fuel for testing, simplify the evaporative emissions testing for dual fuel vehicles, and review and seek alignment with the USEPA's certification program.

On Board Diagnostics testing requirements

As we have discussed this is where most of the cost and time are spent in ARB's certification process. Our members maintain that ARB's significantly more burdensome requirements do not provide significantly more air quality benefits than the USEPA program. We submit that the ARB requirements are a significant obstacle to getting more clean cars onto California roads.

We strongly support reducing the testing, limiting the recalibration of monitors, and reducing the volume of reporting that is required. The contrast between ARB's and USEPA's programs in this area is quite striking. EPA requires calibration and emissions testing of 5 major monitors. Companies are required to report emission test results. This can be done in a few pages, sometimes just one spreadsheet. EPA staff is often able to review this information in just a week and make a quick determination of whether to approve or not approve. Contrast that process with ARB's. ARB requires more monitors to be adjusted, more tests for each of those monitors to be conducted, lots of documentation on the adjustments to monitors, and obviously many more test results to be reported. This often leads to a package that is 200-300 pages long. It takes ARB about 3 months to review this package and then there is often considerable Q&A between ARB and the applicant.

Possibly the most costly and time consuming portion of ARB's OBD testing is the requirement to age components for testing. USEPA allows the use of assigned deterioration factors rather than the threshold aged approach. We strongly encourage ARB to allow companies that have proven their technical skill and reliability to use assigned deterioration factors to demonstrate compliance with your OBD requirements.

Application process

We strongly support allowing alternative fuel certifications for new vehicles or engines to automatically qualify for aftermarket certification if requested. We believe this request can be made with a one page letter or possibly by checking a box on the application form. Some additional documentation will be needed for labeling and warranty changes but that should be all that is needed.

Extension of certification life

We support the extension (renewal) of new vehicle or engine certifications to allow manufacturers one full year of sales. For us this means and Executive Order would extend until December 31st of the year following a given model year. This change

should be helpful but is not an alternative to shortening the certification process on the front end. As a reminder once we pass the first Quarter of each calendar year it is challenging to get current model year vehicles from the OEMs because they are switching production to the new model year.

Test fuel

We request that ARB allow companies to use commercially available fuel rather than a specialized test fuel. Commercially available fuel is more representative of the real world and thus real world emissions. Test fuel can cost \$100 per gallon. Our second option would be for ARB to harmonize natural gas certification test fuel requirements with federal standards.

Evaporative Testing

The time and cost to conduct the evaporative testing for dual fuel vehicles is unreasonable and unnecessary. The shed testing currently required includes four tests which all together can take a month. We believe the same verification can be achieved with one 2 or 3 day test just on the natural gas system. We encourage ARB to review the current requirements in this area.

USEPA's approach

As you know USEPA revamped their testing and certification program in the last 18 months. We understand that ARB staff is reviewing this program. We appreciate this and request that ARB look for every opportunity to align the ARB's requirements with EPA's to reduce costs and time for the companies seeking to bring more clean vehicles to market.

The California Natural Gas Vehicle Coalition thanks you for the work you and your team have put into reviewing this program and seriously considering our suggestions for improvements.

Sincerely,

A handwritten signature in black ink that reads "Tim Carmichael". The signature is written in a cursive, flowing style.

Tim Carmichael
President