

COMMONWEALTH OF PENNSYLVANIA
Comment and Response Document for the Guidance Document for Clean Alternative Fuel
Conversion System Policy Implementation

COMMENTATORS:

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COMMENTS AND RESPONSES

1. COMMENT: The proposed guidance will promote the development of natural gas refueling infrastructure in Pennsylvania. (1, 2, 4, 6)

RESPONSE: The Department agrees and encourages that development.

2. COMMENT: The proposed guidance will encourage businesses related to natural gas to locate and/or operate in Pennsylvania. The policy will support natural gas related in-state jobs. (1, 4)

RESPONSE: The Department agrees.

3. COMMENT: The interpretation that the Pennsylvania Clean Vehicles (PCV) Program allows for the flexibility to use conversion systems that are certified by either the United States Environmental Protection Agency (EPA) or the California Air Resources Board (CARB) is the correct interpretation from a legal and/or policy standpoint. (2, 3, 4, 6)

RESPONSE: The Department agrees that the flexibility of the PCV Program allows for the use of either EPA- or CARB-certified alternative fuel conversion systems.

4. COMMENT: The proposed guidance will result in increased vehicle selection for vehicles that are converted to operate as dual fuel or dedicated alternative fuel vehicles. (2, 3, 4)

RESPONSE: The Department agrees. The intent of the guidance is to encourage conversions to cleaner, alternative fuel systems.

5. COMMENT: The proposed guidance will promote an increased market (demand) for dual fuel or dedicated alternative fuel vehicles, and will encourage fleet conversions. (3, 5, 6, 7)

RESPONSE: The Department agrees that the guidance will help eliminate uncertainty and encourage the expansion of the alternative fuels conversion market.

6. COMMENT: Allowing vehicles to be converted to natural gas or other alternative fuels will improve air quality by decreasing pollutant emissions. (4, 5)

RESPONSE: The Department agrees. Converting a vehicle to use natural gas or other alternative fuels using either EPA- or CARB-certified conversion systems will result in equal or lower pollutant emissions than the original fuel.

7. COMMENT: The proposed guidance will encourage the development of dual fuel or dedicated natural gas (or other alternative fuel) vehicles by vehicle manufacturers. (3, 4)

RESPONSE: The Department hopes that the guidance will promote the development of alternative fuel refueling infrastructure, which may encourage major vehicle manufacturers to develop a greater selection of new dual fuel or dedicated alternative fuel vehicles.

8. COMMENT: Allowing conversions to alternative fuels will result in cost savings for vehicle operators. (2, 4)

RESPONSE: The Department agrees, based on current fuel prices, that operating on alternative fuels may result in cost savings for vehicle operators.

9. COMMENT: Commentators expressed general support for the proposed guidance. (1 – 7)

RESPONSE: The Department appreciates the support expressed for the guidance.

10. COMMENT: The PCV Program should be revised to allow for natural gas vehicle conversion systems certified by EPA. (6)

RESPONSE: Because the PCV Program is silent on conversion systems and does not adopt the California regulations that require a CARB Executive Order to be issued for clean alternative fuel conversion systems, 13 CCR §§ 2030 – 2032, there is no need to make any regulatory changes to the PCV Program. The guidance clarifies the policy position of the Department relating to aftermarket alternative fuel vehicle conversions.

11. COMMENT: It would be helpful if the guidance also clarified that EPA certified or approved conversion systems may be used on heavy-duty motor vehicles (vehicles above 8,500 pounds gross vehicle weight rating (GVWR)). (3)

RESPONSE: The Department is only clarifying in this guidance that the PCV Program, which adopts CARB light-duty vehicle emission standards by reference, allows new passenger cars and light-duty trucks (vehicles 8,500 pounds or less GVWR) to be converted to use an alternative fuel by either installing an EPA- or CARB-certified alternative fuel conversion system. The Department will address the requirements for alternative fuel conversion systems designed for vehicles with a GVWR over 8,500 pounds (medium and heavy-duty vehicles) separately in a future guidance document.

12. COMMENT: As of April 2011, EPA regulations allow manufacturers to receive approval for systems installed on older vehicles (more than two model years old or beyond useful life vehicles) without obtaining a certificate of conformity. The proposed guidance appears to conflict with these EPA regulations by requiring that all EPA-approved systems receive a certificate of conformity. (3)

RESPONSE: The guidance addresses alternative fuel vehicle conversions for new vehicles subject to the PCV Program, which are light-duty vehicles with less than 7,500 miles on the odometer. It is possible that a vehicle referenced in the comment could fall within

this category. In its April 8, 2011 regulation (76 FR 19830) relating to clean alternative fuel vehicle and engine conversions, EPA established an approval process for vehicles in the intermediate age category, which differs from the certification process for new vehicles. The intermediate age category in EPA's regulations consists of vehicles whose model year is less than or equal to the current calendar year minus two and which are still within their regulatory useful life. The Department has revised the guidance document to indicate the Department's position that the PCV Program allows a conversion system that has met the intermediate age program demonstration and notification requirements of EPA's April 2011 regulations, but has not received a certificate of conformity, to be installed on vehicles in the intermediate age category that are still subject to the PCV Program.