

DRAFT CONCEPTS

Overview: Over the past several months, the staff of the ARB has worked with fuel producers, fuel distributors, engine manufacturers, local government agencies, and other interested parties to evaluate supply and compliance issues associated with the two alternative motor vehicle fuels, compressed natural gas (CNG) and liquefied petroleum gas (LPG).

Some issues have been identified, which may require amendments to the alternative fuels regulations. One issue is the unavailability of complying CNG or LPG in certain geographic areas of the State. Other issues include the use of off-specification LPG in delivery trucks and safety concerns with the required LPG sulfur detection test method, ASTM 2784. The following potential options will be discussed at the workshop.

Potential Options:

- Captured Fleet Provision- Would allow use of off-specification CNG or LPG for captured fleets meeting conditions. These conditions include, but not limited to:
 - Must notify ARB of intent to use off-specification motor vehicle LPG or CNG
 - Applies only to captured fleets with controlled fueling facilities to preclude unauthorized or public access
 - Enter into memorandum-of-understanding with fuel suppliers, vehicle/engine manufacturers, and fleet owners to clarify agreements or disclaimers pertaining to warranty claims
 - Maintain records for ARB review with information including: vehicle IDs, fueling facilities, fuel quality
 - Must implement controls to prevent mis-fueling

- Exemption for delivery vehicles fueled on LPG- Would allow the use of off-specification LPG in delivery trucks, which typically use the LPG that is being transported. Under the current regulation, this is not allowed.

- Consider a replacement LPG sulfur detection analytical test method- Would allow the use of alternative test methods that would give similar results to referenced method, ASTM D 2784-89, used to determine the sulfur content of LPG. Safety concerns have been identified with the ASTM 2784-89.