

Dear Colleagues,

The ARB is pursuing reductions in Greenhouse gases through the GHG Reduction Act and the Low Carbon Fuels initiative. Additionally, the Truck, Bus and Heavy equipment initiatives are seeking reductions in PM from diesel exhaust (sadly, diesel micro-particles, which may be the primary instigator of alveolar disease is not addressed by this technology). Towards this end, an elaborate schema has been created for diesel fleet owners to navigate in attempt to be in compliance via exhaust treatment retro-fits.

Unfortunately, the best solution for all these initiatives, conversion of existing in-use diesel engines to run on Natural Gas with a catalytic converter for NOx, has not been treated equally as an emissions strategy.

Unlike exhaust treatments, which can be certified to any number of emissions levels, and can be certified by engine "family" application, Natural Gas conversion engines are considered by CARB to be "NEW" motors, which must meet existing on-road emissions criteria, and each engine must be certified by model and on a per year basis.

Exhaust treatment technology must only pass longevity testing that sees if the new emissions equipment will last, not the engine as a whole, while Natural Gas conversions must be warranted as "New", and the entire engine must last 300,000 miles or hourly equivalent, despite the fact they may be 30 year old engines.

Conversion technology has been successfully adopted in Thailand, India, China and Burma, with dramatic reductions in PM and GHGs. Adoption has been rapid as conversion actually makes a profit for the fleet owner, with 100% ROI usually with in the first 9 months.

Turn over of Heavy Duty trucks, buses and equipment will NOT be rapid enough to attain the 2020 emissions goals. Conversion of existing in-use engines is the only practical way to attain this goal. Towards this end, I am asking you to stop classifying Natural Gas and Diesel engines separately, but to instead adopt a universal emissions standard for all engines based upon work output- not based upon fuel utilized or ignition system type. Please level the playing field for Natural Gas conversion technology.

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