KINGS CANYON UNIFIED

Mr. Dean Simeroth - Chief Criteria Pollutants Branch
California Air Resource Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Simeroth,

I am writing to you in advance of the upcoming ARB public meeting on March 7, 2001. Kings Canyon Unified is an end user of "out of spec." compressed natural gas (CNG) used as motor vehicle fuel in nine Blue Bird Transit style school buses powered by 8.1 John Deere engines.

Our use of this "out of spec." CNG has been a positive experience. We own, operate and maintain our own Ingersol Rand 57CFM compressor skid with six slow fill positions built by Marcum Fuel systems in 1996. We began our CNG experience with the first five 1996 CNG Blue Bird school buses arriving from a successful grant application from the California Energy Commission (CEC) Phase III demonstration program, to replace pre-1977 school buses that were gross polluters. We then received two additional CNG replacement buses from the CEC Phase IV program in 1999. With the successful operation of these seven buses Kings Canyon Unified placed an order in July of 2000 for two new CNG school buses. These are the first additional buses to our fleet in ten years. While CNG buses do cost more than traditional diesel, our district felt that purchasing Natural Gas buses was the right thing to do both for our environment and political community.

With the completion of over 387,000 miles in our nine CNG school buses and the use of over 60,000 diesel gallon equivalents of natural gas fuel we are viewed as a local success. There are several fleets in our community that wish to obtain CNG from Kings Canyon Unified. We have identified additional potential fleets who could also benefit from using clean natural gas; thus benefiting our community with reduced emissions. The fuel spec. issue may prevent us from continuing to expand CNG use in our region. It is Kings Canyon Unified's contention that out of spec. CNG is still much cleaner then current and near future diesel formulations.

Kings Canyon Unified has been awarded $83,000 from CEC to enhance our CNG fueling infrastructure and an additional $202,000 from Congestion Mitigation & Air Quality Funds

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for a second compressor and fast fill dispenser to create a Public Access CNG Station in our community.

It is our desire to be able to continue our own use of out of spec. fuel and to be able to provide CNG to designated community fleets by arrangement only. This would only be with ARB's approval to allow us to continue to distribute and use "out of spec." fuel.

With the recent $50 million Governor Davis Clean Air School Bus monies coming available there are a number of small local school districts expressing interest in obtaining CNG school buses in our area. Being unable to use out of spec. natural gas may prevent them from participating in this valuable program and delay the replacement of their older dirtier emission buses.

We have experienced no mechanical malfunctions with the 8.1 John Deere engines as a result of using out of spec. CNG. Performance data provided to the CEC during Phase III data collection showed Kings Canyon Unified buses performed as well as similar CNG buses in areas using spec. fuel. Data tests conducted at California Truck Test Center using Kings Canyon Unified Buses and out of spec. fuel vs. spec. fuel showed similar achievements with little difference in emissions performance results.

During ARB's deliberation of this matter Kings Canyon Unified appreciates your consideration in continuing to allow us to use out of spec. CNG fuel. Please grant us a permanent waiver of this fuel specification rule. I would further request of ARB at the very least to adopt a regional rule to allow captive fleets in our area to use out of spec. CNG. Thank you for this consideration. If we can be of further assistance to you or your staff please contact us.

Sincerely,

John D. Clements
Director of Transportation

cc: Dr. Alan C. Lloyd, Chairman - California Air Resourses Board
Mike Kenny, Executive Officer - California Air Resourses Board
Peter Venturini, Div. Chief - California Air Resourses Board
Gary Yee, Manager - California Air Resourses Board
Leslie Crowell, Engineer - California Air Resourses Board
Bernard Treanton - California Energy Commission
Lilly Ghaffari - California Energy Commission
Thomas Cummings - John Deere Systems Group
Ron Smith - A-Z Bus Sales
Mike Eaves / Steve Anthony - Southern California Gas Co.
Dr. Rod Frese, Assist. Supt. - KCUSD

KINGS CANYON UNIFIED TRANSPORTATION
COMPRESSED NATURAL GAS SCHOOL BUS HISTORY

1996 BlueBird 8.1 John Deere CEC Phase III AB35 Demo. Program	Starting Mileage	12/2000 Mileage	Total Traveled
#31	387	80,849	80,462
#35	5,707	60,590	54,883
#38	3,736	79,994	76,258
#40	5,611	75,074	69,463
#41	367	61,164	60,797

1999 BlueBird 8.1 John Deere CEC Phase IV AB35 Demo. Program	Starting Mileage	12/2000 Mileage	Total Traveled
#17	2,998	26,679	23,681
#18	3,060	23,943	20,883

2001 BlueBird 8.1 John Deere District Purchased with some AB2766 Funds from SJVAPCD	Starting Mileage	12/2000 Mileage	Total Traveled
#60	3,198	3,881	683
#61	2,958	3,294	336

TOTAL SCHOOL BUS CNG MILES = 387,446

Natural Gas Fuel Consumption

Southern California Gas Co. natural gas from the Kings Canyon Unified owned and operated CNG Fueling Facility = 78,772 therms

Pacific Gas and Electric Co. natural gas from a public fueling facility 22 miles away at Sanger Unified or Sacramento on field trips = 5,556 therms

TOTAL THERMS USED by KINGS CANYON UNIFIED CNG SCHOOL BUSES = 84,328
84,328 divided by 1.4 DGE conversion = 60,234 Diesel Gallon Equivalent
387,446 Total Miles Traveled divided by 60,234 Diesel Gallon Equivalent = 6.43 Miles Per Gal.

NEW CNG BUSES	31	35	38	40	41
CHASSIS #	TCRE3904	TCRE3904	TCRE3904	TCRE3904	TCRE3904
CHASSIS SERIAL	69286	69287	69288	69288	69290
CHASSIS SERVICE	997695	997646	997648	997661	
BODY #	F115073	F115074	F115075	F115076	F115077
BODY SERVICE	190793	190633	190647	190673	190809
VIN #	1BAANBMA9VF069286	1BAANBMA0VF069287	1BAANBMA2VF069288	1BAANBMA4VF069289	1BAANBMAOVF069290
GVWR	37400	37400	37,400	37,400	37,400
GAWR FRONT	14400	14400	14400	14400	14400
GAWR REAR	23,000	23000	23,000	23,000	23,000
FRONT AXLE	1736701	1736701	1736701	1736701	1736701
REAR AXLE	1836048	1836048	1836048	1836048	1836048
REAR AXLE RATIO	5.38	5.38	5.38	5.38	5.38
ENGINE MAKE	8.1 CNG	8.1 CNG	8.1 CNG	8.1 CNG	8.1 CNG
ENGINE MODEL#	6081HFNO1	6081HFNO1	6081HFNO1	6081HFN01	6081H004502
ENGINE SERIAL#	RG6081H004543	RG6081H008900	RG6081H004546	RG6081H004544	RG6081H000452
CUSTOMER #	RG6	RG6	1797695		
ENGINE SERVICE #	RG6081H004543	RG6081H008900	RG6081H004546	RG6081H004544	RG6081H000452
TRANS MAKE	WORLD TRANS	WORLD TRANS	WORLD TRAN	WORLD TRANS	WORLD TRAN
TRANS SER #	6510076791	6510071072	6510075117	6510069701	6510076301
TRANS PT #	2952399096D15	2952399196B13	29523991/96C26	2952399196A26	2952399/96D10
TRANS MO #	MD3060R	MD3060R	MD3060	MD3060	MD3060
DIFF. MAKE	DANA/SPICER	DANA/SPICER	DAN/SPICER	DAN/SPICER	DAN/SPICER
DIFF. #	047CA1094X	047CA1094X	047CA1094X	047C91094X	047CA1094X
DIFF. BANJO #	047AF2054	047AF2054	047AF2054	047AF2054	047AF2054
AIR RIDE MODEL #	1200	1200	1200	1200	1200
FRONT SPRING #	1-1405A	1-1405A	I-140SA	1658830	I-140SA
FRONT BRAKE DRUM #	1583384	1583384	WEBB 65169B	1583384	WEBB 65169B
REAR BRAKE DRUM #	321953945	321953945	321953945	321953945	321953945
FACTORY STOCK #	96S217	96S217	96S219		96S219
NEW DATA STICKERS	YES	YES	YES		
CHP CERT DATE	9/30/96	10/23/96	8/14/96	12/5/96	10/23/96
BEGINING MILEAGE	387	8/16/15	3635	5611	367
DAS #	2001	2008	263	5611	367
LIC. PLATE	EO51668	EO53054	E048489	E055017	E44719
INTAKE PIPE COUPLER	284-1487016	284-1487016	284-1487016	284-1487016	284-1487016

NEW CNG BUSES	60	61
CHASSIS #	A3RE8400	A3RE8400
CHASSIS SERIAL	200281	200282
CHASSIS SERVICE	FA3RE10070855	FA3RE10070855
BODY #	F131146	F131147
BODY SERVICE	FA3RE10033020	FA3RE10033005
VIN #	1BABNBMA01F200281	1BABNBMA21F200282
GVWR	36200	35100
GAWR FRONT	14600	14600
GAWR REAR	23000	23000
FRONT AXLE	1961481	140BN10811 DANA
REAR AXLE	1887652	1887652
REAR AXLE RATIO	5.38	5.38
ENGINE MAKE	DEERE 8.1 CNG	DEERE 8.1 CNG
ENGINE MODEL#	6081HFN01	6081HFN01
ENGINE SERIAL#	RG6081H117974	RG60081H117302
CUSTOMER #		1797695
ENGINE SERVICE #		
TRANS MAKE	ALLISON WORLD TRANS	ALLISON WORLD TRANS
TRANS SER #	6510254762	6510285749
TRANS PT #		
TRANS MO #	MD3060R	MD3060R
DIFF. MAKE		
DIFF. #	047CA107-FX	047CA107-FX
DIFF. BANJO #		
AIR RIDE MODEL #		
FRONT SPRING #		
FRONT BRAKE DRUM #	1827906	1827906
REAR BRAKE DRUM #	1827906	1827906
FACTORY STOCK #		
NEW DATA STICKERS		
CHP CERT DATE	12/6/00	12/6/00
BEGINING MILEAGE	3005	2958
DAS #		
LIC. PLATE		
INTAKE PIPE COUPLER		

NEW CNG BUSES	BUS 17	BUS 18
YEAR	2000	20000
CHASSIS #	T2RE3904	T2RE3904
CHASSIS SERIAL	85458	85457
CHASSIS SERVICE	FT2RE10025870	FT2RE10020800
BODY #	F123774	F123773
BODY SERVICE	FT2RE10012750	FT2RE100010450
VIN #	1BAANBMA9YF085458	1BAANBMA9XF085457
GVWR	37,400	37,400
GAWR FRONT	14600	1961481 Spicer
GAWR REAR	23000	23,000
FRONT AXLE	1961481 Spicer	1961481 Spicer
REAR AXLE	188762	188762
REAR AXLE RATIO	5.38	5.38
ENGINE MAKE	John Deere 8.1 CNG	John Deere 8.1 CNG
ENGINE MODEL#	6081 HFNO1	6081 HFNO1
ENGINE SERIAL#	RG6081H078414	RG60801H077314
CUSTOMER #		
ENGINE SERVICE #	RG6081H078414	RG6081H077314
TRANS MAKE	Allison	Allison
TRANS SER #	651090178	6510179818
TRANS PT #		
TRANS MO #	MD3060	MD3060
DIFF. MAKE	SPICER	SPICER
DIFF. #	047AF205-4	047AF205-4
DIFF. BANJO #	H047CA107-7X	H047CA107-7X
AIR RIDE MODEL #	REYCO 1200	REYCO 1200
FRONT SPRING #	1658830507	1658830507
FRONT BRAKE DRUM #	1583384	1583384
REAR BRAKE DRUM #	321953945	321953945
FACTORY STOCK #	998080	998080
NEW DATA STICKERS		
CHP CERT DATE	8/11/99	6/9/99
BEGINING MILEAGE	2805	3056
DAS #	NA	NA
LIC. PLATE		E1037481
INTAKE PIPE COUPLERS		

C8

City of Reedley
Community Development Department
1733 Ninth Street
Reedley, CA 93654-2636
(559) 637-4200
FAX 637-2139

June 9, 1999

Peter Ward, Program Manager
California Energy Commission
Alternative Fuel Infrastructure
Grants and Loan Office, MS-1
1516 Ninth Street
Sacramento, California 95814

Dear Mr. Ward:

The City of Reedley supports Kings Canyon Unified School District in their effort to secure funding to enhance their existing Compressed Natural Gas Fueling Station. Our agency desires to partner with the school district as a end user of this station for fueling our future CNG disposal truck and light duty public utility vehicle purchases. Our agency has a future need for a metered dispensing facility in the Reedley for which Kings Canyon Unified is seeking funding.

Our City anticipates purchasing CNG vehicles in the future We plan to seek CMAQ and Carl Moyer funds for the acquisition of these vehicles. The Kings Canyon Unified CNG fueling site would support our continuing effort tot seek CNG vehicle funding.

We encourage the Commission to fund this Project in an effort to further promote clean natural gas use in our community.

Sincerely,

Andrew J. Benelli

Andrew J. Benelli, P.E.
City Engineer

99mlm052.wpd

FCRTA

FRESNO COUNTY RURAL TRANSIT AGENCY

2100 Tulare Street, Suite 619 Fresno, CA 93721 559-233-6789

June 8, 1999

Peter Ward - Program Manager
California Energy Commission
Alternative Fuel Infrastructure
Grants and Loan Office, MS -1
Sacramento, CA 95814

Dear Mr. Ward:

The Fresno County Rural Transit Agency (FCRTA) supports the Kings Canyon Unified School District (KCUSD) efforts to secure funding to enhance their existing Compressed Natural Gas (CNG) Fueling Station. Our Agency desires to partner with the School District as an "end user" of this Station for refueling our existing and future CNG rural transit vans and buses. We are currently in need of a fast-fill metering dispenser facility on the Eastside of Fresno County. This Application in the Reedley Area by Kings Canyon Unified will address our immediate and future needs.

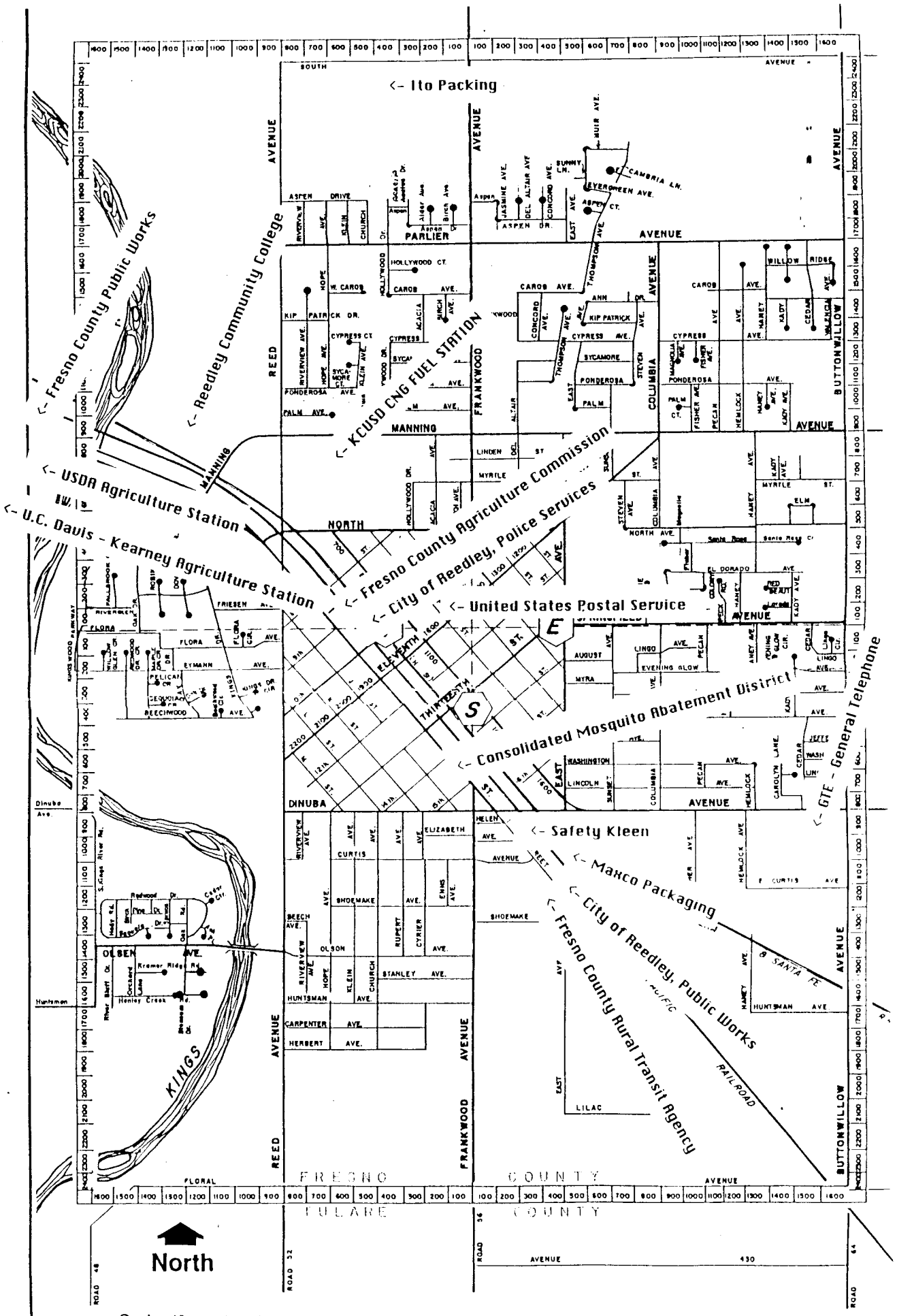
Currently our general public transit agency operates fifty (50) vehicles. Ninety-two percent (92%) are alternatively fueled for cleaner air. We operate twenty-three (23) on CNG, twenty-one (21) on propane, two (2) are electric battery powered, and the remaining four (4) are operated on unleaded fuel only because the California Air Resources Board (CARB) has *not* certified a CNG or propane conversion kit to retrofit these late model vehicles.

We currently operate two (2) twenty-four passenger CNG buses, and nine (9) CNG vans in the Area. They travel approximately 285,000 miles per year and utilize approximately 35,000 gallons of equivalent fuel. Our plans to purchase an additional five (5) thirty-one (31) passenger CNG buses, and five (5) fifteen (15) passenger CNG vans for use in the Eastern Area of Fresno County is contingent on the successful installation of a fast-fill facility such as the one identified in this Application. We could find it necessary to refuel these vehicles at the KCUSD site. Our fuel requirements through the District could exceed 50,000 gallons of equivalent fuel annually.

We encourage the California Energy Commission to fund this needed project in an effort to further facilitate, encourage, and promote the clean natural gas use in our Area of the San Joaquin Valley.

Sincerely,

Jeffrey D. Webster
General Manager
Fresno County Rural Transit Agency


<- Ito Packing
<- Fresno County Public Works
<- Reedley Community College
<- KCUSD CNG FUEL STATION
<- USDA Agriculture Station
<- U.C. Davis - Kearney Agriculture Station
<- Fresno County Agriculture Commission
<- City of Reedley, Police Services
<- United States Postal Service
<- Consolidated Mosquito Abatement District
<- GTE - General Telephone
<- Safety Kleen
<- Maxco Packaging
<- City of Reedley, Public Works
<- Fresno County Rural Transit Agency
PARLIER
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REED AVENUE
FRANKWOOD AVENUE
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STEVEN
BUTTONWILLOW AVENUE
ELEVENTH
THIRTEENTH
EAST
KINGS
FRESNO COUNTY
TULARE COUNTY
SANTA FE
RAILROAD
North
Scale: 1" = 1000'
(Approx.)
City of Reedley
Date: FEB 95