

CARB Reformulated Gasoline Workshop

Sacramento, CA
November 15, 1999

AIAM Statement

- All Interested parties agree that the California a phase 2 RFG program has been a successful environmental program; this includes the auto industry the oil industry, environmentalists, EPA, and state officials.
- We believe that much of this success is because gasoline in California is required to be blended within a fairly narrow range of parameters with the result that Cal phase 2 RFG is a consistent product without a broad range of variability.
- This consistency allows auto manufacturers to design vehicles and fine-tune calibrations to minimize emissions.
- This consistency also contributes to consumer satisfaction by minimizing vehicle performance and driveability problems which can occur with variations of fuel quality from one tankful of gasoline to the next.
- With the proposed Cal phase 3 RFG specifications, CARB is reversing this situation making things worse, not better.
- Nearly all of the gasoline parameters would be subject to a broader range of variability under the proposed phase 3 specs compared to phase 2 RFG, including RVP, aromatics, T50, T90, and oxygen.
- This will NOT contribute to environmental progress and will likely lead to increased consumer dissatisfaction.
- CARB's proposal to adopt a DI specification in phase 3 is a good idea, but the 1225 limit proposed is too high.
- In its petition early this year to EPA requesting nationwide control of distillation properties of gasoline, the auto industry requested a cap of 1200 DI with an oxygen correction factor for ethanol.
- The 1200 DI limit is based on today's vehicle technology.
- The 1200 DI limit is also somewhat of a compromise, since available data shows that emissions and consumer driveability and performance problems actually increase sharply after a DI of 1150.
- Many LEV II vehicles are likely to be even more sensitive to DI due to the ultra stringent LEV II hydrocarbon standards.
- The combination of these stringent HC standards and high DI gasoline will lead to engine misfires during cold start operation of vehicles, which will greatly increase HC emissions and driveability and performance problems for motorists.
- AIAM believes that CARB should set phase 3 RFG specifications which contribute to reducing, not increasing, variability in gasoline and should adopt a DI limit no higher than 1200 with an oxygen correction factor for ethanol.