



Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman

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Gray Davis
Governor

February 7, 2000

Mr. Robert Perciasepe
Assistant Administrator for Air and Radiation
United States Environmental Protection Agency
401 "M" Street, S.W. (6101)
Washington, D.C. 20460

Dear Mr. Perciasepe:

We very much appreciate the time taken by the members of your staff who came to Sacramento and met with California Air Resources Board staff on January 24 and 25, 2000, regarding California's request for a waiver of the federal year-round oxygen mandate for federal reformulated gasoline (RFG) in the state. I understand a great deal of progress was made in identifying and providing additional material and analyses responsive to issues raised by the United States Environmental Protection Agency (U.S. EPA) staff and interested parties. Attached is the additional information identified by your staff during the meeting as being needed for the U.S. EPA to complete its evaluation of the California waiver request.

The attachment includes information on six topics identified below with appropriate reference materials.

- I. Comparing the California Phase 3 Reformulated Gasoline (CaRFG3) Predictive Model to the U.S. EPA Complex Model
- II. Identifying the NO_x benefits representative of nonoxygenated gasoline and oxygenated-with-ethanol gasolines produced to meet the CaRFG3 standards
- III. Discussion of carbon monoxide, hydrocarbons, and oxides of nitrogen issues
- IV. ARB's efforts to address commingling air quality effects
- V. Simulation analysis of future gasolines produced to comply with CaRFG3 specifications

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VI. Sensitivity analysis to evaluate the effect of not including off-road emissions in the CaRFG3 Predictive Model

With this attached information, we feel that we have provided the U.S. EPA with all of the requested information, and we urge you to act promptly to approve the California waiver request.

If you have any questions or wish to discuss the requested waiver, please contact me at (916) 445-4383, or Mr. Michael H. Scheible, Deputy Executive Officer at (916) 322-2890.

Sincerely,

Michael P. Kenny
Executive Officer

Attachments

cc: Winston H. Hickox, Secretary for California Environmental Protection Agency
Alan C. Lloyd, Chairman, California Air Resources Board