DEPARTMENT OF TRANSPORTATION
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November 14, 2002

Linda Bluestein
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Office of FreedomCAR and Vehicle Technologies
Docket No. EE-RM-02-200, EE-2G
1000 Independence Avenue, SW
Washington, DC 20585-0121

Subject: Comments Regarding the Proposed Ruling To Designate Fischer-Tropsch Diesel (FTD) Fuel as Alternative Fuel Under the EPAct of 1992.

The California Department of Transportation (Caltrans) is in support of your proposed ruling to designate FTD fuel as an alternative fuel. Caltrans has embarked on a program to significantly reduce the emissions from its fleet of approximately 14,000 vehicles statewide, and Caltrans considers the FTD product to be an important strategy for reducing emissions from its fleet, especially if this fuel is recognized as an alternative fuel.

Over the past 2 years, Caltrans has partnered with the California Energy Commission (CEC) on a program to measure the emissions reduction benefits of FTD. The data was generated in the California Truck Testing Services (CaTTS) laboratory in Richmond, California from several Caltrans, heavy duty, diesel powered vehicles retrofitted with various emissions reducing technologies including catalyzed diesel particulate filters. This testing showed important emissions reductions which will be forwarded to you by the CEC.

In addition, Caltrans used approximately 7,500 gallons of FTD fuel at its facility based in Stockton, California, and experienced no adverse affects. See the attached letter describing our testing of this fuel in our fleet.

Caltrans is interested in using this fuel in its fleet and supports the designation of this fuel as an alternative fuel to improve its availability. If you have any questions, please contact me at (916) 227-9608.

Sincerely,

J. KRIS TEAGUE
Acting Chief
Division of Equipment

Attachment

State of California

Business, Transportation and Housing Agency

Memorandum

To: Rick Sheasby
Supervising Equipment Engineer

Date: 6/3/02

File: GTL

From: **DEPARTMENT OF TRANSPORTATION**
Equipment Service Center

Subject: GTL FUEL TEST

From April 12, 2002 through May 11, 2002 approximately 7,500 gallons of Gas To Liquid (GTL) diesel fuel was distributed from the Caltrans bulk fuel site in Stockton. During that period 69 different Caltrans units fueled at the Stockton site. The 69 units were comprised of 46 different Maintenance Classes ranging from ¾ pickups to class 8 tractors along with various construction units. During the test period none of the units experienced fuel-related problems. Nor have we experienced fuel-related problems since converting back to Ultra Low Sulfur Diesel.

M.O. Heiner
HES II Shop 10