



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Clean Fuel Fleet Program Requirements

FROM: Leila H. Cook, Group Manager 
Transportation & Regional Programs Division

TO: Air Program Managers

This will be of interest to you only if one of your states has a Clean Fuel Fleet Program approved in their SIP.

EPA's Clean Fuel Fleet Program (CFFP) was established by the 1990 Clean Air Act amendments to reduce emissions in metropolitan areas not meeting Federal air quality standards including the then-new 1-hour standard for ozone. It should be noted that under the Clean Air Act's section 110(l) anti-backsliding provisions, and EPA's 1-hour anti-backsliding regulations at 40 CFR Subpart X, section 51.900 et seq., the CFFP is considered an "applicable requirement." As such, despite revocation of the 1-hour ozone standard, the requirement to implement a CFFP remains until such time as the area in question attains the 8-hour ozone standard.

Since the time the CFFP requirement became law, EPA has promulgated new vehicle emission standards that are generally more stringent than, or equivalent to, the Clean-Fuel Vehicle (CFV) emission standards for light-duty vehicles, light-duty trucks, and heavy-duty vehicles and engines. These new EPA regulations also added a new medium-duty vehicle passenger class, and created a new chassis test procedure for heavy-duty vehicles.

On July 21, 2005, EPA issued a "Dear Manufacturer" letter - CCD-05-12 (attached) regarding Clean-Fuel Vehicle Standards to provide guidance on determining the equivalency of vehicle and engine emission standards in Code of Federal Regulations (CFR) Part 86 and Part 88 for Clean-Fuel Vehicles.

The above-referenced EPA letter establishes current Part 86 emission standards which EPA has determined to be as or more stringent than corresponding Part 88 CFV emission standards. The comparison addresses Tier 2 vehicles (LDVs, LDTs, and MDPVs), and 2005 and later model year heavy-duty vehicles (including 8,501-10,000 GVWR and 10,001-14,000 GVWR Otto-cycle chassis certified), heavy duty Otto cycle engines, and heavy-duty diesel engines. (See the Determination section, page 2 of the attached letter). To meet the requirements of the Clean Fuel Fleet Program fleet managers can be assured that vehicles and

engines certified to current Part 86 emission standards, which EPA has determined to be as or more stringent than corresponding CFV emission standards per the attached EPA Dear Manufacturer Letter meet CFV emission standards and CFFP requirements as defined in CFR Part 88. Such vehicles do not require a separate CFF certification or CFF label to qualify to participate in the CFF program. Thus, such vehicles are CFF compliant and are available to satisfy CFF SIP obligations.

This memorandum supersedes an earlier EPA memorandum dated July 2, 2004. This earlier memorandum was also focused on addressing CFFP requirements and the new Tier 2 emissions standards.

Attachment