



Maryland

Department of the Environment

Larry Hogan
Governor

Boyd Rutherford
Lieutenant Governor

Ben Grumbles
Secretary

Mr. Chris Rice
Division Director of Energy Programs
Maryland Energy Administration
1800 Washington Boulevard
Baltimore, MD 21230

Re: Alternative Fuel System Conversions

Dear Mr. Rice:

Thank you for meeting with agency staff from Maryland Department of the Environment (MDE) and myself on September 8, 2016. At that meeting, representatives from the alternative fuel industry requested that MDE clarify the State's policy on alternative fuel conversion kit acceptance. Please accept this letter as clarification on MDE's policy with regards to alternative fuel conversions.

Maryland adopted the California Low Emission Vehicle (LEV) Program starting in 2011. The LEV program requires all new vehicles sold, imported, delivered, purchased, leased, rented, or acquired for titling or registration in Maryland meet the California Air Resources Board (CARB) emission standards. New vehicles certified as meeting the Environmental Protection Agency (EPA) 50-state emissions standards may also be transferred in Maryland. This requirement applies only to vehicles with a gross vehicle weight rating of 14,000 pounds or less. As part of the LEV program, alternative fuel systems are allowed on new vehicles in Maryland provided the system is certified. Certification helps ensure that installation of the conversion kit does not constitute tampering with emissions control systems and that vehicle emissions are not adversely impacted.

MDE requires that aftermarket alternative fuel conversion systems be properly certified for the specific vehicle or engine family that is being converted. As such, CARB certified conversion kits are required to be used on vehicles only certified to the CARB standards. However, EPA certified conversion kits may be used on EPA 50-state certified vehicles and vehicles with dual-certification. Use of uncertified conversion kits or use of conversion kits on vehicles not included in the CARB¹ or EPA² certification, may constitute tampering with emissions control systems under the federal Clean Air Act and may result in an enforcement action by either EPA or MDE. Additionally, as a matter of a public health, vehicles converted to alternative fuel systems are required to continue

¹ <https://www.arb.ca.gov/msprog/aftermkt/altfuel/altfuel.htm>

² <https://www.epa.gov/vehicle-and-engine-certification/vehicle-and-engine-alternative-fuel-conversions>

meeting any applicable vehicle emissions inspections as set forth in COMAR 11.14.08.01. The governing agency for vehicle emissions inspections in Maryland is the Motor Vehicle Administration. Please direct any questions regarding vehicle emissions inspection requirements to that agency's VEIP division. Please call 410-768-7000 for more information.

Fuel diversification is important for the State to meet its long term environmental, economic and energy goals. Alternative fuel conversion kits provide a means of increasing the availability and awareness of alternative fuels while potentially decreasing the emissions from the transportation sector. Please feel free to contact Tim Shepherd by email at tim.shepherd@maryland.gov or by phone at 410-537-3236 if you should have any questions or require additional information on this issue.

Sincerely,



George (Tad) S. Aburn, Jr., Director
Air and Radiation Administration Management Administration

cc: Marcia Ways, MDE Mobile Sources Program Manager
Mike Jones, MEA Transportation Program Manager