

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 31, 1998

Mr. Jeffrey L. Clarke
Natural Gas Vehicle Coalition
Suite 1030
1515 Wilson Blvd.
Arlington, VA 22209

Dear Mr. Clarke:

On September 4, 1997, the Environmental Protection Agency ("EPA") issued an Addendum to Mobile Source Enforcement Memorandum IA ("Addendum") that describes the options available to parties who manufacture, distribute and install alternative fuel conversion systems. Parties who meet the requirements of the Addendum are considered by EPA to be in compliance with the tampering prohibition of Section 203(a)(3) of the Clean Air Act.

One of the options described in the Addendum, identified as Option 3, allows use of aftermarket alternative fuel conversion kits that have been evaluated under testing procedures described in the Addendum, provided the testing is completed by March 31, 1998.

EPA is considering whether to revise the Addendum to extend the March 31, 1998, deadline for testing under Option 3, but EPA's consideration of this revision will require several weeks to complete. In the meantime, EPA will allow parties to continue testing under Addendum Option 3 until April 24, 1998. This new deadline may be extended to a later date when the Addendum revision is announced.

If you have any questions, please contact Mr. Richard Ackerman at (202) 564-2255.

Sincerely,

/s/

Bruce C. Buckheit, Director
Air Enforcement Division

cc: Richard Roldan, National Propane Gas Association
Dan Kelly, Railroad Commission of Texas