

# Legal Requirements for Conversion Vehicles

## FREQUENTLY ASKED QUESTIONS ABOUT EPA AND CARB REGULATIONS.

A variety of applications, from vehicles to construction equipment, can be converted to be propane-powered. It is essential that you only sell and install certified AFC systems that meet federal and state laws. Read on to learn everything you need to know about the regulations driving these laws.

### WHAT DOES IT MEAN TO BE EPA-CERTIFIED?

As a part of the Clean Air Act, the Environmental Protection Agency established requirements for all U.S. off-road engines and on-road vehicles and vehicle engines including alternative fuel conversion (AFC) systems. AFC systems must be EPA-certified to meet emissions standards specific to the engine category and size. All engines, whether new or used, are required to have a valid certificate of conformity issued by EPA and a valid equipment decal. Without both the certificate of conformity and the decal, the engine is not certified. This includes gasoline and diesel engines using an AFC system to run on propane.

### WHAT IS CARB CERTIFICATION AND WHICH STATES REQUIRE CARB-CERTIFIED ENGINES?

The California Air Resources Board (CARB) certifies vehicles and engines that demonstrate exhaust and evaporative emission control systems that are durable and comply with the organization's strict emission standards. Arizona, Connecticut, Maine, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Rhode Island, Vermont, and Washington require CARB-approved OEM vehicles and engines. Most CARB states do not require CARB-approved AFC systems, and will accept those approved by EPA. California and Maryland have adopted CARB regulations for AFC systems, and Massachusetts has not adopted CARB regulations for OEM vehicles and engines, but insists on CARB-approved AFC systems. For more information, visit the Air Resources Board website at [arb.ca.gov](http://arb.ca.gov).

### THE LEGAL CONSEQUENCES OF USING UNCERTIFIED SYSTEMS

Choosing certified systems is the right choice for your business because certifications are required by law. Propane-powered vehicles and off-road equipment such as lawnmowers, construction equipment, and outdoor power equipment are market segments with potential growth for the propane industry. To ensure you and your customers enjoy continued success with these new technologies, it is critical to only sell and install certified AFC systems that meet all federal and state laws. Systems not meeting these requirements are illegal and subject to substantial financial penalties and fines. As a propane provider, you should be aware of the implications of using uncertified engines or alternative fuel conversion systems and should communicate those consequences to any customers who may be violating the law.





## HOW DO REQUIREMENTS CHANGE BASED ON ENGINE AGE?

The EPA provides compliance options for alternative fuel conversion systems based on the age of the vehicle or engine. Vehicles and engines are separated into three age categories – new, intermediate, and outside useful life. All conversion manufacturers are required to demonstrate compliance with EPA requirements, but requirements differ based on these age categories.

- New vehicles and engines are less than two years old. Manufacturers are required to conduct certification tests to ensure the vehicle/engine complies with emission standards and will be issued a certificate of conformity.
- Intermediate vehicles and engines are at least two years old, but still within their regulatory useful life. For this age category, fuel conversion manufacturers must prove through testing that the converted vehicle or engine still meets applicable emission standards.
- Outside useful life vehicles and engines have exceeded their regulatory useful life.
  - Light-duty vehicles and light light-duty trucks have a useful life of 10 years or 120,000 miles, whichever occurs first.
  - Heavy light-duty trucks have a useful life of 11 years or 120,000 miles, whichever occurs first.
  - Manufacturers may elect to optionally certify a test group to the Tier 2 exhaust emission standards for 15 years or 150,000 miles to generate NOx credits. This optional useful life applies to heavy-duty vehicles.

- ◊ Use the test group code listed on the emission label and look up the certificate of conformity at <http://iaspub.epa.gov/otaqpub/pubadvsearch.jsp>.

- Manufacturers of conversion systems designed for outside useful life vehicles and engines must provide the following:

- ◊ Detailed technical information describing the conversion system.
- ◊ Scan tool report showing that both vehicle/engine emission controls and the On-Board Diagnostic (OBD) system continue to work properly.

Complying with these regulations is required by law. Fuel conversion manufacturers (or converters) will be held accountable for acceptable emissions performance.

## WHAT ARE THE CONSEQUENCES OF SELLING AND/OR INSTALLING AN UNCERTIFIED SYSTEM OR ENGINE?

Under the Clean Air Act, tampering with a vehicle emissions system is a Federal offense. The penalty amount may vary by offense, and could be increased based on a number of different factors including the gravity of the violation, the economic benefit or savings (if any) resulting from the violation, the size of the violator's business, the violator's history of compliance with the Clean Air Act, action taken to remedy the violation, and the effect of the penalty on the violator's ability to continue in business. For more information, and penalty amounts, visit [epa.gov](http://epa.gov).

For off-road engines, recreational vehicles, and heavy-duty highway vehicles, the amount of emissions and the economic benefit associated with being non-compliant are proportional to the engine's size.

## HOW DO I KNOW IF AN AFC IS CERTIFIED?

A list of EPA- and CARB-certified propane autogas vehicles is available at [Propane.com](http://Propane.com). If you have further questions about EPA- and CARB-certified engines, please visit [epa.gov](http://epa.gov), and search "vehicle and engine certifications."



## FOR MORE INFORMATION

To learn about propane-powered fleets, visit [Propane.com](http://Propane.com).

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