Alternative Fuels Related Comments
December 15, 2017

Mr. Mike Abraczinskis  
Director, North Carolina Division of Air Quality  
North Carolina Department of Environmental Quality  
217 West Jones Street  
Raleigh, NC 27603

RE: North Carolina’s Volkswagen Settlement Spending Plan

Dear Director Abraczinskis:

Public Service Company of North Carolina, Inc., dba PSNC Energy (“PSNC”) would like to submit the following comments concerning the Volkswagen Settlement Spending Plan. First, PSNC would like to acknowledge Governor Cooper’s selection of the Department of Environmental Quality (“DEQ”) as North Carolina’s state agency to administer the funds, and based on our conversations with you and others in the Department (Brian Phillips and Phyllis Jones), we are convinced that decision to place this important responsibility in DEQ is well-founded. DEQ has demonstrated substantial awareness and knowledge of the settlement and the process that should be followed as decisions are made and funds are disbursed, and we applaud the Governor’s decision.

PSNC would also like to acknowledge our role as a signatory to a letter from the Compressed Natural Gas (“CNG”) coalition that was recently delivered to DEQ. PSNC supports the positions explained in that letter, and is writing now to emphasize the following:

- Many studies have determined that the expanded use of CNG is the best way to decrease NOX emissions, which is consistent with the stated goals of the settlement.
- While CNG is well-suited for many applications, studies also have determined that CNG is an excellent, more cost-efficient choice for heavy-duty applications compared to other fuel choices. We submit that the final plan should certainly include expanded CNG use for heavy-duty applications.
- Finally, PSNC’s position is that enough of the overall settlement funds have been directed to electric vehicles, and that the remaining settlement funds should be directed to other fuels.
We sincerely appreciate the opportunity to comment and stand ready to work with the Department on a plan that truly benefits the state, and results in the cleaner air the settlement was intended to achieve. If you have questions or would like further information, please contact Bill McAulay at (919) 819-9976 or wmcaulay@scana.com.

Very truly yours,

George B. Ratchford
Vice President - Gas Operations

C: /Brian Phillips
   Phyllis Jones
VW Settlement Diesel Emissions Reduction Action (DERA)
Request for Information (RFI):

The GOAL Model

A transformative property redevelopment and community investment model, based on green business incubation, biomass and biofuel production and distribution and a waste-to-fuel-to-transportation hub

Dec. 28, 2017

with Assistance from
The Forest Foundation, Inc.—a 501(c)(3)
Green Business Development Services

promoting sustainable livelihoods and biofueling community vitality!
Section 1. Project Applicant Information

Company/Agency/Organization Name: The GOAL Site operated by The Forest Foundation, Inc.
Contact Person Name: J. Marc Dreyfors
Government/Non-Government: NG
Mailing Address: 1410 Cross St. Durham, NC 27701
Phone Number: 919.957.1500
Email Address: info@theforestfoundation.org

Section 2. VW Program and Solicitation Design Questions

1. How should DEQ prioritize projects?
Use life-cycle analyses of benefits and costs, preventative risk and social justice.
Renewable energy, energy efficiency and air toxics exposure reductions

2. What is the anticipated demand for each eligible project type?
Environmental mitigation 70%, EV 20% and Buyback 10%(buy back from consumers then donate to fleets using RDB50 infrastructure, thus latent energy of car won’t be lost)

3. The percentage of trust funds, if any, that DEQ should devote to Light Duty Zero Emission Vehicle Supply Equipment?
Base number on current growth of industry and then double it.

4. What is the anticipated demand for specific types of diesel emission reduction projects not eligible under the VW settlement but otherwise eligible under DERA or other state programs?
High

5. Should a certain percentage of available VW funds be allocated to each eligible project type and if so how should the percentage be determined?
Env. Mit. 50%, EV 40%, BB 10%

6. Should a certain percentage of available Mitigation Trust funds be reserved for government projects?
Only if they meet highest lifecycle impact and can be leveraged

7. Should funds be geographically distributed, and if so how?
Non-attainment areas should be given priority

8. Should governmental entities be required to provide matching funds and if so, how much?
Yes 50%
9. Should DEQ establish a minimum project size and if so, what size?
Whatever makes sense from a review time and likely number of submissions, if it’s a ten year program
then projects with ten year timelines would be good? Small is not a measure of impact. Projects that
can scale or replicate easily should be prioritized.

10. In addition to evaluating a proposed project’s total cost effectiveness ($/ton), what other key factors
should DEQ consider when evaluating projects?
Social justice and social cost of pollution are key, low income communities are being hurt at a much
higher rate than others from pollution, money spent should also be used to attack the income and voting
inequality gaps which kills people due to denial of service, public transportation

11. What other feedback do you have on project evaluation and/or scoring criteria?
Get a diverse review team, simplify the process of submission and metrics

12. What publicly available tool(s) should be used to quantify anticipated emission reductions/offsets
for eligible mitigation projects? What, if any, additional resources should be provided and made
available?
NREL, EPA and UNC have some new modeling tools, not sure how user friendly they are.

13. What methods could DEQ employ to reduce barriers and increase participation in future
solicitations for projects?
Standardized form submission, make sure people of color list serves are notified. Suggest partnerships
of similar projects or participants

14. What information/resources would be most valuable for stakeholders interested in submitting
projects and what is the best way to communicate these?
Stats. on relative risk, lifecycle analyses of impacts, cost benefit versus precautionary principle, help
find additional funding sources as well as risk reduction insurance and interest rate reduction systems
for other capital lending entities. We need a model that will show human health cost reductions for
each gallon of diesel, or other fossil fuels, displaced. Market failure/externalities are poorly modeled.

Section 3 – Applicable Eligible Mitigation Project Category:
We are wanting to install a Renewable Diesel/Biodiesel Production and Distribution Terminal and will
distribute fuel to all categories below, but operate a fleet of buses out of the same site and already
distribute to a cooperative of small business fleet trucks.

1. Class 8 Local Freight Trucks and Port Drayage Trucks with 1992-2009 model year engines and
a Gross Vehicle Weight Rating (GVWR) greater than 33,000 pounds (lbs.)

2. Class 4-8 School, Shuttle, or Transit Buses with model year 2009 or older engines and a GVWR
greater than 14,001 lbs. and used for transporting people.

3. Class 4-7 Local Freight Trucks with 1992-2009 model year engines and a GVWR between 14,001
and 33,000 lbs.
4. Freight Switchers with pre-tier 4 engines and operating more than 1,000 hours per year.
7. Airport Ground-Support Equipment with Tier 0 - Tier 2 diesel engines,
8. Forklifts with greater than 8,000 lbs. lift capacity and/or Port Cargo Handling Equipment.
Section 4 Project Summary:

This RFI is an introduction to our waste-to-fuel-to-transportation project in Durham, called The GOAL Site. We are wanting to use this old BP Petroleum Terminal, Brownfield site to increase rail, tanker and short truck distribution of renewable diesel/biodiesel (RDB50) blend. The site currently supplies B100/B70 products to a fleet of 13 charter, transit and shuttle buses and a cooperative of a half a dozen small business fleet trucks, roll backs, delivery trucks and rigs. The geographic area where vehicles/vessels/engines are operated will be primarily the Triangle, but we envision the impact may be broader depending on the number of fuel adopters. The fleet type will be geared primarily toward school buses due to the public health benefits of reduced air toxics exposure to children during child development. The mitigation action is the replacement of 100% of current fleet fuel of diesel, on and off road, with a renewable diesel and local biodiesel blend. This blend will allow existing diesel equipment with no modifications and only slightly increased maintenance costs (i.e. storage tank cleaning or replacement, fuel filter change) to greatly reduce particulates and other carcinogens by up to 70%, NOx by 20%, and carbon by half. At the same time locally produced biodiesel will keep money in the community and help support a Hope VI community in east Durham, and help remediate a Brownfield site. The socio-economic multipliers of locally produced energy are significant.

Initially the number of engines/vehicles/vessels/equipment targeted for emission reductions will be roughly several dozen, but if price points for the blended fuel are close to Greensboro rack price, the fuel will have a comparative advantage in transportation cost and gain users. If demonstrations of the fuel blend, which the current fleet users are, prove successful, (and there should be no reason they aren’t), and political pressure is placed on the fleet managers and procurement system, then the volume is projected to be several million gallons per year. This equates to tons of air toxics and carbon footprint reduction for the Triangle. Most importantly, if school fleets in the area adopt the blend, then asthma and a range of other physical and mental health costs will be reduced over the lives of the children, which could equate to millions of dollars saved by individuals and communities. The mission reduction/offset technology to be used is displacement of diesel with a RDB blend, as well as idle reduction and driver efficiency training.

The estimated cost of project is approximately $1 million over 5 years, to purchase property and install rail and distribution and storage infrastructure and increase production and distribution of RDB50. It will take approximately a year to build out the site, with tanker shipments starting immediately and rail cars within 10 months. Most of the funds will be recouped in sales within 5 years, and can be reused to support the development of other similar projects, such as a Triangle Pollution Mitigation Fund, that would provide long-term, alternative capital to local carbon and pollution mitigation projects. The funds could also be used to replicate the GOAL Model in other communities. This proposal is a “plug-and-play” solution until electrification by renewables can be scaled, and municipalities have the funds to convert fleets to electric.
Section 5 Project Detail:

Provide information on specific engines/vehicles/vessels/equipment targeted for emission reductions, including (where applicable):]

<table>
<thead>
<tr>
<th>Year</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of vehicles:</td>
<td>36</td>
<td>72</td>
<td>144</td>
<td>288</td>
<td>576</td>
</tr>
</tbody>
</table>

**Class or equipment type:**
(Class 1-4, 7,8 from Section 3)

<table>
<thead>
<tr>
<th></th>
<th>12 C1/12 C2</th>
<th>12/36</th>
<th>36/66</th>
<th>50/196</th>
<th>150/320</th>
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<tbody>
<tr>
<td>12 C3/ 0 C4</td>
<td>12/6</td>
<td>24/6</td>
<td>24/6</td>
<td>24/12</td>
<td></td>
</tr>
<tr>
<td>0 C7/ 0 C8</td>
<td>6/6</td>
<td>6/6</td>
<td>6/6</td>
<td>12/12</td>
<td></td>
</tr>
</tbody>
</table>

**amount of fuel used(gals):**

- 30-50K
- 180-200K
- 350-400K
- 740-800K
- 1-1,600K

**annual miles traveled/hours:**

- 150k/50k

**annual idling hours:**

- 10k

**Engine makes:**

- Detroit Series 50, 60; Cummins L, ISC; International; Catepillar; Ford; Mercedes

**Engine model years:** (1990-2016)

**Current tier level or emission standards:** ?

**fuel type:** renewable diesel/biodiesel

Provide information on the new eligible verified and/or certified diesel emission reduction technology(s) to be implemented under the proposed project, including (where applicable):}

Depending on providers and contractors equipment and service terms, the option exists to outfit vehicles with sensors that can monitor drivers and help improve idling and drive efficiency. The challenge is in the cost of simply managing the system, working the data and training the drivers. Larger fleets may make the investment and operations numbers more viable, but small fleets, less so.

Distribution from the GOAL Site will comply with the desire to reduce emissions from areas that have been the most greatly impacted by dirty fossil fuel addiction. Customer locations and vehicle usage/routes can be mapped and will likely be within the EPA’s non-attainment area for the Triangle.

Nearly all the workers at GOAL are exoffenders or chronically under-employed. 95% of the drivers are minorities, single parents or veterans. For 4 years we have run a Green Jobs training program, called “Green Tracks” out of our site, partnered with a number of community development organizations. We have also provided entry level and first job experiences for over hundred inner city kids, giving them a “leg up” on the growing Green Economy.

This project would directly benefit communities impacted by NOx and a broad range of other air toxics. If we can get school systems to adopt the fuel blend in school buses, the benefits will be greatly amplified by the reduction in exposure during child development, which research shows having enormous long term public health benefits in reduced asthma, a wide range of cardio-vascular disease, and mental health problems of schizophrenia, bi-polar and autism.
**Capital and Project Costs:**

Calculate and provide projected capital cost ($/unit) and total project cost.

Note calculations should include operation and maintenance cost.

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Petroleum brownfield site purchase</td>
<td>$800,000</td>
</tr>
<tr>
<td>Storage Tanks: 40K gals</td>
<td>$40,000</td>
</tr>
<tr>
<td>Tanker Trailer 7300 gals</td>
<td>$20,000</td>
</tr>
<tr>
<td>Short Truck 2500 gals</td>
<td>$20,000</td>
</tr>
<tr>
<td>Pipes 3in</td>
<td>$10,000</td>
</tr>
<tr>
<td>Transfer Pumps</td>
<td>$10,000</td>
</tr>
<tr>
<td>Installation</td>
<td></td>
</tr>
<tr>
<td>Containment</td>
<td>$30,000</td>
</tr>
<tr>
<td>Oil/water separator</td>
<td>$20,000</td>
</tr>
<tr>
<td>Electrical</td>
<td>$10,000</td>
</tr>
<tr>
<td>Permits</td>
<td>$20,000</td>
</tr>
<tr>
<td>Cash Flow</td>
<td>$200,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$1.18 Million</strong></td>
</tr>
</tbody>
</table>

Additional capital would be needed to expand local waste veggie oil collection and biodiesel production on the order of $200K. Matching funds would come from the companies that share the GOAL Site, the fuel distribution company, cooperative fleet companies and local municipalities, as well as traditional sources of funding from banks, foundations and donations.

**Expected Proposed Project Benefits:**

<table>
<thead>
<tr>
<th>Emission</th>
<th>RDB50</th>
</tr>
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<tbody>
<tr>
<td>THC</td>
<td>85%</td>
</tr>
<tr>
<td>PM</td>
<td>50%</td>
</tr>
<tr>
<td>CO</td>
<td>23%</td>
</tr>
<tr>
<td>NOx</td>
<td>15%</td>
</tr>
<tr>
<td>CH4</td>
<td>85%</td>
</tr>
<tr>
<td>CO2</td>
<td>50-85% (higher if depending on lifecycle of RD, local waste B100 has very low &gt;80%)</td>
</tr>
</tbody>
</table>

**The amount of fuel used (gals):**

30-50K 180-200K 350-400K 740-800K 1-1,600K

Total hydrocarbons (THC) is defined as VOC (volatile organic compounds) emissions are total hydrocarbon emissions (THC), or unburned hydrocarbons (UHC), excluding methane and ethane.

Based on the above fuel volume calculations,
Heavy Duty diesel vehicles average 5 miles per gallon, Medium Duty closer to 10 and Light Duty may be 15-20. Newer vehicles have better emissions profiles, but the goal of this project is to target older fleets in non-attainment and low income communities to achieve higher reductions and benefits.

The biggest challenge will be adoption by fleets and this will hinge on the “plug and play” adaptability of a RDB50 fuel, particularly to its ability to work with existing NOx reduction and storage and distribution pump systems. A year long trial of this blend in the area will start in February of 2018 and testimonials will be key to adoption. RDB20 has been used already in many markets with no problems reported in adoption.

Though electrification and “zero emission” vehicles would have a more localized effect on air toxics, the emissions are simply displaced to power plants, and dispersed over a wider area or targeted on power plant fuel and production communities. Based on their lifecycle foot prints and environmental justice impacts, the actual emissions and impacts maybe greater than RD and local waste biodiesel. This will also allow immediate air emissions reductions on older fleets with little cost, allowing the utilization of existing systems and vehicles until newer, lower emissions systems are affordable.
November 30, 2017

North Carolina Department of Environmental Quality
217 West Jones Street
Raleigh, NC 27603

RE: Development of North Carolina’s Volkswagen Settlement Spending Plan

Dear Director Abraczinskas,

We, the undersigned, are a group of public and private sector stakeholders united by a common desire to see North Carolina develop the most environmentally effective and equitable spending that achieves the greatest NOx emissions reduction per dollar for the funds spent pursuant to the Volkswagen Settlement (settlement). Under the eligible designations, natural gas vehicles (NGVs) should play a key role in the enacted plan given their ability to achieve a significant reduction in NOx emissions, which is evidenced by their eligibility demonstrated in each vehicle class. Also, an appropriate consideration when deciding how to invest settlement funds is that $2 billion has been designated separately for the purposes of Zero Emission Vehicles.

Recommendations

- Aim for the Greatest Environmental Impact for Public Health by Separating the Funds – Private & Public Sectors Respectively, 70-30
- Allow All Low NOx, Near-Zero and Zero Emission Vehicles to be Eligible for Grants in the Amount of 25 Percent of the Total Vehicle Cost
- Public Sector Vehicle Grants Should Require a 50 Percent Match
- Grant Prioritization

Aim for the Greatest Environmental Impact for Public Health by Separating the Funds – Public & Private Sectors Respectively

Under the terms of the settlement, there are eleven categories eligible for funding. Four of these represent medium and heavy-duty on-road vehicles, which are also the greatest contributors of NOx emissions of the categories listed. Focusing the settlement funds on these applications will target the greatest emitters, and therefore provide the greatest environmental benefit through their reduced emissions.

Furthermore, on-road vehicles travel in all North Carolina communities, thereby insuring the air quality benefits are shared by all citizens, especially those in urban areas where heavy truck traffic yields health risks for our most vulnerable populations. Conversely, other funding categories, such as those for rail and marine applications, are location specific and proportionally higher cost investments, compared with trucks or buses.

By sharing the funds between the public and private sectors, North Carolina serves to benefit from cleaner mass transit, school buses, refuse, regional and short-haul trucking. A structured plan should account for the greater miles travelled by private fleets and allow the state to show it takes air pollution seriously, by targeting investment where NOx emissions are greatest – while also improving the emissions of government owned vehicles.
We propose a 70-30 split, whereby proportionally, industry is incentivized to upgrade fleets and achieve the highest emissions reduction possible.

Allow All Low NOx, Near-Zero and Zero Emission Vehicles to be Eligible for Grants in the Amount of 25 Percent of the Total Vehicle Cost

Advancements in alternative fuel vehicle technology have made drastic reductions in emissions possible. In North Carolina, Cummins-Westport has begun production of near-zero natural gas engines that produce 90 percent fewer NOx emissions than a new diesel engine. A California Energy Commission report indicates that the near-zero natural gas engine can reduce the life-cycle emissions of medium and heavy duty vehicles to levels near or equal to those of zero emission electric vehicles. The South Coast Air Quality Management District of California views the near-zero NOx standard to be zero emission equivalent based on the district’s mix of electric generation supplying their grid. Moreover, their electric generation mix is one of the cleanest in the country, and therefore North Carolina would experience a greater benefit.

While comparable with regard to NOx emissions, natural gas and electric vehicles (EVs) are miles apart on cost. An all-electric medium or heavy duty vehicle can cost twice the amount or more of a similar vehicle powered by a near-zero natural gas engine. Yet, under the terms of the settlement, EVs may receive a grant up to 75 percent of the total vehicle cost, while NGVs and all other alternative fueled vehicles may only receive a grant for up to 25 percent of the total vehicle cost. Therefore, funding the more expensive EV, and at a greater percentage, will result in fewer vehicles being deployed and fewer reductions in NOx emissions. Our recommendation establishes a rational and equitable arrangement, as EVs under this approach will receive close to twice as much funding per vehicle as an NGV.

Below is a chart illustrating these points by showing the benefits of a $7.5 million investment in NGVs versus that same investment in EVs.

![VW Funding $7.5 Million Short Haul Truck Example](source: NGV America compiled from Gladstien, Neandross and Associates Game Changer Report Data)

Due to the NOx emissions reductions NGV’s provide a benefit to the environment, especially in urban and industrialized area. The use of natural gas as a transportation fuel is a proven

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technology that enables companies and organizations to reduce emissions, provide a sustainability message, and lower operating costs.

Public Sector Vehicle Grants Should Require a 50 Percent Match

The Settlement allows for a 100 percent funding level for government vehicles, which provides a great opportunity for public fleets to reduce their emissions. However, the allure of “free vehicles for the government” should not be permitted to dissipate the otherwise greater potential for a more positive environmental impact, through grants to industry too in the deployment of cleaner vehicles.

The full funding of government vehicles results in fewer vehicles being deployed per dollar, and therefore a reasonable cap must be put in place. A proper balance can be achieved by requiring matching funds in the amount of 50 percent of the vehicle cost, which will not only ensure a larger deployment of vehicles but also encourage judicious decision making regarding new vehicles. This approach sets a financially sustainable trajectory over the long-term, rather than a one-time proposition that does not account for future replacement costs.

Grant Prioritization

These grants should be used to leverage as many benefits for the Tar Heel state as possible. Therefore, priority should be given to those applications which:

(a) Result in the use of alternative fueled vehicles, engines, and parts that are manufactured or assembled in this State;

(b) Will attract new employers to the State or will encourage job growth;

(c) Benefits small businesses

Conclusion

North Carolina has a great opportunity to improve air quality and public health, while further transforming the transportation fleets that have a tremendous impact.

Thank you for considering our recommendations, and we look forward to working with you as this plan continues to be developed and finalized.

Representing nearly 4,000 North Carolina vehicles,

Susan Alt
Senior Vice President, Public Affairs
Volvo Group North America

Brett Barry
Senior Policy Advisor
Clean Energy
Anne W. Butler  
Director of Sales  
U.S Gain, a Division of U.S Venture, Inc.

Crystal Collins  
President  
North Carolina Trucking Association

Randall Essick  
Director, Business Development & Gov’t Affairs  
Waste Management, Inc.

Chip Gifford  
Manager of CNG Business Development  
Piedmont Natural Gas

Joseph L. Gordon  
President  
e-Energy Alternatives, LLC

Drew Isenhour  
Area President  
Republic Services Mid-Atlantic Area

Ian MacDonald  
Director of North American Sales  
Agility Fuel Sales

Bill McAulay  
VP, Economic Development & Government Affairs  
PSNC Energy

Sherrie Merrow  
Chair, State Government Advocacy Committee  
NGVAmerica

Frank Morris  
Vice President/UPS Corporate Public Affairs  
UPS

Ven Poole  
Chairman/CEO  
Waste Industries

F. Durward Tyson, Jr.  
Gas Systems Engineer  
Greenville Utilities
December 30, 2017

Agility Fuel Solutions, Powertrain Systems

Corporate Headquarters Fuel systems and engine assembly
3335 Susan Street, Suite 100 1010 Corporate Center Drive
Costa Mesa, CA 92626 Salisbury, NC 28146

Contact: Curtis Donaldson, General Mgr. Business Development
curtis.donaldson@agilityfs.com
512-789-8527

Wayne Moore, Programs Mgr.
wayne.moore@agilityfs.com
941-730-3320

Reference: North Carolina Department of Environmental Quality RFI

Agility Fuel Solutions operates in six countries providing alternative fuel vehicle solutions; fuel storage solutions, engine solutions, fuel system solutions and much more. Supporting fleet customers and vehicle OEM’s, Agility Fuel Solutions delivers CNG, LNG, Hydrogen, LPG (propane) & Hybrid Electric products. Our more than 200,000 sq. ft. state of the art manufacturing facility in Salisbury, NC is just one example of our commitment to manufacturing quality products. For more information please visit our website at http://www.agilityfuelsolutions.com.

Our comments below:

1. Prioritizing projects
   o School buses are an important segment to make a priority
     ▪ Our children ride these buses for 12 years
     ▪ Replacing the diesel engine with an LPG engine repower package would provide years of operation using an environmentally cleaner, quieter and more reliable product in comparison to the diesel engine
     ▪ Running a clean LPG engine provides many social, economic and environmental benefits
       • All required vendors are located in North Carolina which brings jobs and prosperity to the State
       • Lower cost fuel, lower operating cost per mile driven
       • Lower maintenance costs
2. Anticipated demand for an eligible project
   o A repower of one of the older diesel engines could be a large demand due to a number of factors.
     ▪ Inherent mechanical problems require engine replacement long before the expected life expectancy of the vehicle.
     ▪ There are > 11,000 school buses using this engine and every shop has had trouble.
     ▪ In North Carolina this engine is currently used in ~1,000 school buses that could all be easily converted to operate on clean burning LPG using proven OEM products. Replacing diesel engines would enable North Carolina to meet the goal of the VW mitigation trust.

3. Should DEQ devote funds to Light Duty Zero Emission Vehicle supply equipment?
   o All clean air plans should include support of all forms of clean power vehicles.
   o The key to successful deployment that achieves desired near and long-term results is to assess and balance the overall cost of implementation and emission reduction benefit across the fleet.
   o Near term, the total cost of zero emission vehicle deployment is quite high resulting in displacing fewer diesel vehicles per dollar invested when compared to near zero clean fuel vehicles. So, while funds should be devoted to zero emission vehicles, successful growth of a clean fuel vehicle market requires balanced seeding and support. The VW settlement provides the opportunity for developing the foundation for clean fuel vehicles by also promoting abundant domestic produced energy.

4. What is the anticipated demand for specific types of diesel emission reduction projects not eligible under the VW settlement but otherwise eligible under DERA or other state programs?
   o The demand for clean diesel emission reduction projects is high.
   o The challenge remains though that diesel emission reduction technology continues to add significant cost to the engine and exhaust after treatment including the inconvenience of adding DEF to a separate tank.
   o Where the VT365 engine has a diesel particulate filter, regeneration has performed poorly due to the duty cycle of a school bus and many larger school districts have purchased expensive equipment to clean these filters, taking more maintenance time as well.
   o Put as much or more funding into engine combustion efficiencies/technology as exhaust after treatment for diesel.

5. Should a certain percentage of available VW funds be allocated to each project type and if so how should the percentages be determined?
   o Yes, VW funds should be allocated to numerous project types. A balanced approach to advance all forms of clean fuel vehicles near term should be employed. The percentages should be determined based on emission reduction impact. Maximizing the number of aged diesel vehicles that are replaced with low emission vehicles thus growing the overall clean fuel vehicle fleet in the State is also a good measure.

6. Should a certain percentage of available Mitigation Trust funds be reserved for government projects?
At least 50% should be reserved for school buses alone. Our future scholars are riding a school bus and this needs to have a major priority.

7. Should funds be geographically distributed and if so, how?
   ○ By the most populated or polluted cities/counties first.

8. Should governmental entities be required to provide matching funds and if so, how much?
   ○ To be eligible for funds from the VW settlement, matching funds shouldn’t be required.

9. Should DEQ establish a minimum project size and if so, what size?
   ○ Yes, creating critical mass of clean fuel vehicles and attracting the sustained interest of innovative companies and individuals requires a fair and balanced approach of funding sizable projects that can then grow into self-sustaining clean air vehicle market segments.

10. In addition to evaluating a proposed project’s total cost effectiveness ($/ton), what other key factors should DEQ consider when evaluating projects?
    ○ Start to finish timing of implementation and benefit.
    ○ Life cycle vehicle cost and benefit to the consumer.
    ○ The number of diesel vehicles/engines removed from service.
    ○ Projected fleet operating cost reductions.

11. What other feedback do you have on project evaluation and/or scoring criteria?
    ○ Where engines are removed from service a way to track and confirm they are destroyed so there’s no chance for anyone to rebuild or re-cycle for profit.
    ○ Leverage this funding opportunity to make it mandatory that fleets in the State acquire a certain percentage of clean fuel vehicles.

12. What public available tools should be used to quantify anticipated emissions reductions/offsets for eligible mitigation projects? What, if any, additional resources should be provided and made available?
    ○ In North Carolina, the EPA has emissions testing capabilities and could offer some testing support.
    ○ PEMS, portable emissions measurement system, is light weight and effective to measure the emissions. Available to the public from a number of suppliers.
    ○ The project could also include the costs of this equipment but also could be shared in a geographic area.
    ○ The need to confirm effectiveness of the project is crucial.

13. What methods could DEQ employ to reduce barriers and increase participation in future solicitations for projects?
    ○ Invest in education and awareness programs promoting the benefits and attributes of clean air vehicles.
    ○ Identifying where and what is emitting the most emissions and providing attractive solutions. Technology will catch up but not without the pressure of regulations and the first adopters to implementation.
    ○ Operating cost is always the bottom line influence, so providing real life examples of how to reduce emissions.
    ○ Provide incentive programs direct to end users that promote the acquisition of clean air vehicles.
Keeping up with technology and the DEQ can announce new technologies that are coming before the public actually hears about it. Providing funding channels to help attract participation.

14. What information/resources would be most valuable for stakeholders interested in submitting projects and what is the best way to communicate those?
   - Publish the State vision, priorities and timing plans to increase the number of clean fuel vehicles on the road
   - Training workshops. Go direct to the interested/proposed stakeholders to encourage participation by providing information and direction.

As a supplier of alternative fuel solutions, Agility Fuel Solutions is and has been supporting the growth and technology for more than 20 years. We will submit a school bus repower project that will reduce NOx emissions from a diesel engine popular in school buses prior to 2007. Our data shows that reductions could be as much as 200% reduction.

We appreciate the opportunity to provide this information and the continued participation with NC DEQ.

Best regards

Wayne Moore
Programs Mgr.
Agility Fuel Solutions
Response to State of North Carolina Department of Environmental Quality Request for Information regarding the Volkswagen Consent Decree Environmental Mitigation Trust Project Ideas

Blue Gas Marine, Inc.

December 2017
Summary of Proposed Concepts to be Incorporated into the Mitigation Plan

The following is a summary of Blue Gas Marine’s (BGM) response to the North Carolina Department of Environmental Quality (DEQ) Request for Information (RFI) regarding the VW Consent Decree (VW Settlement) Environmental Mitigation Trust Project Ideas. BGM proposes the following concepts be integrated into the final plan:

- DEQ should prioritize project selection based as follows:
  1) What projects will reduce the most emissions for the money. This “Bang for the Buck” approach should ensure that the projects that can most efficiently achieve the goals of the settlement will get funded.
  2) Cost-efficient projects that benefit taxpayers by providing savings in state operating costs.
  3) Projects in non-attainment areas as a way of addressing the most pressing emissions issues.

- Due to the fact that marine vessels account for a disproportionately large percentage of emissions, DEQ should ensure that marine applications are as broadly eligible as possible for VW Settlement:
  - Marine vessels, especially commercial diesels, emit much larger quantities of pollutants per gallon burned than on road, due to less stringent mitigation requirements, the burning of dirty diesel and gasoline fuel blends and the average age of marine engines (especially diesel) vs. on-road engines.

- DEQ should allow infrastructure to be eligible to receive funding.
  - The availability of Compressed Natural Gas and electricity will be critical to adoption of natural gas as an on-water fuel and electric vehicles (EV).
  - As with EV charging stations, available on-water natural gas stations will increase awareness and demand for natural gas fueling systems, creating a “snowball” effect that will help to further reduce emissions because of the cost savings of natural gas vs. liquid fuels
  - It will grow the overall availability of natural gas, benefiting local natural gas utilities, increasing the overall availability of natural gas to all industries.

- DEQ needs to ensure that retro-fitting of existing engines, as well as new build or repowers, is eligible for funding. Having said that, where it states in Appendix D-2 to the Partial Consent Decree in paragraph 4(c) “Eligible Ferries and/or Tugs may be Repowered with any new Tier 3 or Tier 4 diesel or Alternate Fueled engines, or with All-Electric engines, or may be upgraded with an EPA Certified Remanufacture System or an EPA Verified Engine Upgrade.”, BGM believes “upgraded” includes retrofitting of existing engine. This is the most economical way of installing natural gas fueling and it would not make sense for it to be deemed ineligible due merely to wording in the drafting of the legislation.

- DEQ should require that the new technologies reduce emissions, instead of bringing vessels up to Tier 4 status.
o Marine engines have a long operating life. If they had to be brought up to Tier 4 status, fewer would be up-fitted to improve emissions and thus these long-lived assets will remain in operations as higher polluting engines.

o If DEQ focuses on the cost-efficiency of emissions reduction when evaluating the proposals, this should not be an issue.

- The requirement of EPA certification should be prior to distribution of funds and not prior to the award.
  o Marine engines are far more varied than on road engines, and thus, seeking out EPA certification for engine modification technologies generally only happens once an order is received, and the engine type has been identified. To require this to prior to just the award being made, vs. prior to actual distribution of funds, would place a significant burden on the makers of add-on engine technologies.
    - As an example, to perform EPA certification testing will require not only the cost of the testing, but the acquisition of an engine. All in this could be upwards of $250,000 before even knowing if the buyer was going to be able to purchase it. Considering some operators can have 4-5 or more different types of engines in their fleet, in order to propose a project to up-fit the engines on an entire fleet, the add-on equipment manufacturer could incur over $1 million in costs.
  o If the technology had to be EPA approved prior to awarding of the funds, it would likely result in the only option being the installation of new engines that are EPA approved. Engine manufacturers don’t have the same issue, due to the fact they only need to go through EPA approval one time and they know they will have to do this before any sales are made. This would be at a huge additional cost vs the addon technologies. As an example, a new dedicated natural gas engine for a large tug could be as much as $4-5 million.

Questions

As requested, the following are responses to the relevant question proposed by DEQ in the RFI.

1. How should DEQ prioritize projects?
   1) See first bullet point above

2. What is the anticipated demand for each eligible project type?
   a. For the conversion of marine engines, the demand should be significant, given the +20 times improvement in emissions per dollar spent vs. on road trucks.

3. The percentage of trust funds, if any, that DEQ should devote to Light Duty Zero Emission Vehicle Supply Equipment?
   a. BGM believe that the best projects should win. Therefore, allocating amounts of money to each project type would have the greatest benefit to the overall goal of the settlement, which is to reduce emissions.

4. Should a certain percentage of available VW funds be allocated to each eligible project type and if so how should the percentage be determined?
   a. As stated above, BGM believe the best projects should get the funding regardless of type.

5. Should a certain percentage of available Mitigation Trust funds be reserved for government projects?
   a. Yes, as stated above, to the extent these projects can reduce costs, that benefit should accrue to the taxpayers of NC

6. Should funds be geographically distributed, and if so how?
   a. DEQ should focus on delivering the greatest benefit for the funds deployed. To the extent that a specific geographic distribution would enable this, then this should be taken into consideration. For example, as it relates to refueling/recharging infrastructure. This is important for projects that
require infrastructure to be successful. For example, electric vehicles, or natural gas fuel marine vessels, will need a network of refueling/recharging stations in order to be viable. However, to the extent this infrastructure develops, it will benefit many other operators in these respective spaces, helping boost the industry as a whole.

7. Should governmental entities be required to provide matching funds and if so, how much?
   a. In the case where the funds will also go to reduce operating costs, no, as these will benefit all taxpayers in NC.

8. Should DEQ establish a minimum project size and if so, what size?
   a. No, to the extent they can be reasonable administered, all projects should be considered.

9. In addition to evaluating a proposed project’s total cost effectiveness ($/ton), what other key factors should DEQ consider when evaluating projects?
   a. DEQ should consider: 1) What if any operational savings they will generate; 2) if these saving accrue to the benefit of taxpayers or only one municipality or private industry; and 3) the prospects for helping establish and grow a new industry in NC.

10. What other feedback do you have on project evaluation and/or scoring criteria?
   a. See Summary Above

11. What publicly available tool(s) should be used to quantify anticipated emission reductions/offsets for eligible mitigation projects? What, if any, additional resources should be provided and made available?
   a. North Carolina State University has emissions testing facilities that have already been used to measure emissions from new combustion technologies.

12. What methods could DEQ employ to reduce barriers and increase participation in future solicitations for projects?
   a. Allow for fast tracking of similar previously approved and implemented projects.

13. What information/resources would be most valuable for stakeholders interested in submitting projects and what is the best way to communicate those?
   a. Identify any areas the state government could be a project partner.

Summary of Natural Gas as a Marine Fuel

When compared with on-road vehicles, marine vessels are extremely large consumers of fuel. A typical recreational boat may get 1-2 miles per gallon, while large work boats and tugs can burn through hundreds of gallons an hour. Emissions requirements for boats are also not as stringent as on-road, resulting in significantly more emissions per mile traveled as on-road. In addition, some vessels, such as commercial tugs, burn a low grade dirtier form of diesel, which results in even more emissions per gallon consumed than on-road diesel trucks.

As such, finding a solution to reduce or eliminate emissions from marine vessels would have an outsized benefit to the environment and operating costs, when compared with typical on-road vehicles. Natural gas as a fuel represents an excellent solution to this problem for the following reasons:

- Replacing diesel commercial marine vessels with natural gas offer the yearly emissions reduction benefit of replacing 275x buses and/or trucks with all electric vehicles at less than 0.5% of the cost.
- Burning natural gas can reduce fuel costs per mile by as much as 70%, and reduce emissions by as much as 90% vs. conventional marine fuels.
- Natural gas can reduce the maintenance costs and downtime for operators because it is cleaner burning and, therefore, results in less carbon deposits in the engine.

There are also a number of reasons the marine environment is very well suited to take advantage of natural gas as a fuel:
1) frequently more systems are being run than just the propulsion system (e.g., larger boats often have critical onboard generators, which can run on natural gas);

2) boats use and take on much more fuel at a time, unlike on-road;

3) there are far fewer refueling locations to retrofit with natural gas due to vast majority of boats exhibit “fleet” behavior, characterized as departing and returning to the same location each night, as well as refueling at the same location;

4) boat construction often allows for excess storage space to store natural gas, which is less energy dense than liquid fuels; and

5) unlike on-road vehicles, converting to electricity is not an option due to the much greater loads placed on marine engines vs. on-road.

Emissions

The following table illustrates the emission differences between all cars and all boats (gasoline and diesel), total and on a per unit basis.

**Table 1.**

<table>
<thead>
<tr>
<th>YE 2005</th>
<th>Marine Vessels*</th>
<th>HWY Vehicles*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tons / yr</td>
<td>Tons / yr</td>
</tr>
<tr>
<td>NOx</td>
<td>2,821,352</td>
<td>6,491,821</td>
</tr>
<tr>
<td>CO</td>
<td>3,007,285</td>
<td>48,544,438</td>
</tr>
<tr>
<td>PM</td>
<td>387,637</td>
<td>329,342</td>
</tr>
<tr>
<td>VOC</td>
<td>990,625</td>
<td>4,112,147</td>
</tr>
<tr>
<td>Registered</td>
<td>12,951,621</td>
<td>247,421,120</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Tons / year per boat</th>
<th>Tons / year per vehicle</th>
<th>% Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>0.2178</td>
<td>0.0262</td>
<td>730%</td>
</tr>
<tr>
<td>CO</td>
<td>0.2322</td>
<td>0.1962</td>
<td>18%</td>
</tr>
<tr>
<td>PM</td>
<td>0.0299</td>
<td>0.0254</td>
<td>18%</td>
</tr>
<tr>
<td>VOC</td>
<td>0.0765</td>
<td>0.3175</td>
<td>-76%</td>
</tr>
</tbody>
</table>


Due to the quantity of fuel and the reduced emissions mitigation requirements of boats vs. on-road vehicles, boats emit significantly greater quantities of pollutants per unit. This is even more true of work boats, especially diesel.

**Overview of BGM**

BGM has developed an end-to-end solution for fueling, storing and combusting natural gas for marine engines. The technology uses the latest supply and storage technology to minimize the space, as well as BGM’s proprietary computerized combustion management system that ensures efficient combustion, even with multiple engines. The result is a technology that:

- Allows a boat owner to burn cheaper domestically-sourced natural gas;
- Increases the miles per gallon equivalent by up to 40% due to improved combustion efficiency;
- Reduces emissions by up to 90% vs conventional fuels;
- Dramatically reduces emission exposure for vessel passengers and workers, which are exposed to very elevated levels of pollutants given their proximity to the emissions source.
- Reduces engine wear;
• Can be installed on existing engines without major engine modifications;
• Reduces engine noise; and
• Allows for hybrid optionality, allowing the operator to burn natural gas, liquid fuels, or both, eliminating concerns about fuel availability.

The BGM technology can economically be installed in a new boat under construction, or in an existing boat as a retrofit. In the case of a hybrid solution, BGM works with the end-user to determine the usage patterns and refueling availability. This allows BGM to design a solution that can meet 99% of the users’ needs, without having to duplicate the fuel storage capacity, thereby reducing cost and storage needs.

Because of the per unit emissions impact of boats vs. on-road vehicles, the BGM system is able to generate a very compelling cost of emission reduction. When compared with, for example, an electric bus, replacing gasoline or diesel/MGO with natural gas is clearly a better use of capital. The following table illustrates the cost of emission reduction for natural gas vs. electric, using the BGM system on commercial harbor tug boats.

**Table 2.**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Gasoline to BGM CNG</th>
<th>Diesel/MGO to BGM CNG</th>
<th>Diesel Bus to EV Bus</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>$17/lb reduced</td>
<td>$15/lb reduced</td>
<td>$4,209/lb reduced</td>
</tr>
<tr>
<td>PM</td>
<td></td>
<td>$106/lb reduced</td>
<td>$252,994/lb reduced</td>
</tr>
<tr>
<td>CO</td>
<td>$2/lb reduced</td>
<td></td>
<td>$5,126/lb reduced</td>
</tr>
</tbody>
</table>

To illustrate the table in another way, taking the Diesel/MGO example, in order to generate the NOx emissions reduction on one harbor tug using the BGM system, you would need to replace 275 city buses with all-electric bus at a cost of $82.5 million vs. $0.35 million for the tug. To generate the same PM emissions reduction, you would need to replace 2,339 city buses with all-electric bus at a cost of $716.6 million!

**Conclusion**

BGM encourages DEQ to adopt the proposed suggestion to the Mitigation Plan, which will facilitate the adoption of natural gas as a marine fuel. Not only does natural gas present the greatest “bang for its buck” from an emissions reduction standpoint, but natural gas in the marine environment also accomplishes the following:

• Is applicable to gasoline and diesel boats;
• Is the only real alternative fuel solution, as electric is not able to provide the horsepower needed;
• Lowers operating costs through reduce per gallon fuel costs, greater efficiency and reduced downtime and maintenance costs;
• Facilitates the adoption of natural gas by other private and recreational boat operators, further reducing emissions;
• Can have an immediate and significant impact on state-owned boats, benefiting all taxpayers;
• Impacts highly populated areas with greater emissions problems on average.
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

As a member of North Carolina's propane industry, I urge you to consider propane-powered vehicles in North Carolina's Volkswagen Environmental Mitigation Plan. The Volkswagen settlement presents a unique opportunity for our state to accelerate the adoption of environmentally-friendly alternative fueled vehicles. Propane marketers in North Carolina are ready to engage in your efforts to offset Volkswagen's excess emissions.

Propane has a proven track record as a transportation fuel in fleets across the country. Right now, the Propane Education and Research Council (PERC) estimates that there are nearly 200,000 propane-powered vehicles on the road in the U.S. One of the most successful adoptions of propane vehicles has been school bus fleets. With the ability to install refueling apparatus cost effectively and easily on site, propane marketers have worked with school districts across the country to switch over to propane models. More than 14,000 propane-powered school buses transport 700,000 students safely every day. In North Carolina, 8 propane-powered buses are already on the road, serving the communities in the counties of Davidson, Mecklenburg, and Randolph. Neighboring states are also embracing propane buses. GA has 301, SC-103, TN -22, and VA with 176 buses. It is important to highlight that as part of the Volkswagen Settlement, propane school buses are eligible for 100 percent of the replacement costs. This makes their adoption using these funds very attractive to school districts in North Carolina.

When considering the use of the Volkswagen settlement dollars, it is important to highlight potential NOx reductions. This is where propane-powered school buses are a winning choice for North Carolina. According to data from Argonne National Laboratory, if North Carolina were to replace all 13,538 eligible for this settlement with new, clean-burning propane models, there would be a 93 percent reduction in NOx. As an additional benefit, there would be a 99 percent reduction in particulate matter (PM) and a 91 percent reduction in tailpipe Volatile Organic Compounds (VOC).

Already in North Carolina, there are 3 school districts that have buses running on clean burning propane. Students on these buses are experiencing these clean air benefits. There is also the added advantage that propane buses are quieter than their diesel counterparts. When factoring in all of the benefits, there is no doubt that investing Volkswagen Settlement funds into propane powered school buses would be one of the most cost effective ways of reducing the excess NOx caused by Volkswagen.

In order to get this large propane supply to the consumer transportation market, the industry relies on a network of public and private refueling stations. Nationwide, there are more than 3,600 stations ready to supply consumers with propane. In North Carolina, there are already 106 public and private stations. NC is the 3rd largest user of propane in the country and we have more bulk plants and retail locations than any other state. There are propane dealers in all 100 counites in NC.

Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
ROBERT MASHBURN
CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov.

Helen Stilley
258 Stilley Road
Trenton, NC 28585
December 22, 2017

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Sincerely,
Helen Stilley
John Norwood  
1626 Peace St  
Henderson, NC 27536  

December 22, 2017  

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John Norwood
Daren Parker
767 Timberlake Drive
Clinton, NC 28328

December 22, 2017

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JAMIE JONES
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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
Robert M. Willis, CPA
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Sincerely,
Julius Cherry
CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov.

Scott Eggers
209 Jacob-Sarah Drive
Vilas, NC 28692

December 21, 2017

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Allan Staten
3200 Carey Rd
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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
David Donahue
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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GEORGE LEWIS
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CHARLES TART
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Sincerely,
Yvonne Jones
Dear North Carolina VW Settlement RFI

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Sincerely,
Brian Yow
Jerry D Bullock
3310 Harrisburg Drive
Fayetteville, NC 28306

December 21, 2017

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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Audrey Shearin
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610 Jordan Road
Fleetwood, NC 28626

December 21, 2017
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Sincerely,
David Parker
CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov.

David Johnson
106 Copeland dr
Elizabeth city, NC 27909

December 21, 2017

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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
David Johnson
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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shelton simpson
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Justin Brown
207 Run Swamp rd
Camden, NC 27921

December 19, 2017
Sincerely,
Justin Brown
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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Sincerely,
Philip DeTore
Bob Moore
4815 Brown rd.
Rougemont, NC 27572

December 19, 2017

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jay cherry
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Donnie Bullock
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Mac Hudgins
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Sincerely,
Donald Young
From: Milton Howard
To: daq.NC_VWGrants
Subject: [External] Response to NC VW RFI
Date: Thursday, December 14, 2017 5:48:43 PM

Milton Howard
735 US Hwy 158 W
Warrenton, NC 27589

December 14, 2017

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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Sincerely,
Milton Howard
From: John Wicker  
To: daq.NC_VWGrants  
Subject: [External] Response to NC VW RFI  
Date: Thursday, December 14, 2017 4:58:33 PM

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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John Wicker
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As a member of North Carolina's propane industry, I urge you to consider propane-powered vehicles in North Carolina's Volkswagen Environmental Mitigation Plan. The Volkswagen settlement presents a unique opportunity for our state to accelerate the adoption of environmentally-friendly alternative fueled vehicles. Propane marketers in North Carolina are ready to engage in your efforts to offset Volkswagen's excess emissions.

Propane has a proven track record as a transportation fuel in fleets across the country. Right now, the Propane Education and Research Council (PERC) estimates that there are nearly 200,000 propane-powered vehicles on the road in the U.S. One of the most successful adoptions of propane vehicles has been school bus fleets. With the ability to install refueling apparatus cost effectively and easily on site, propane marketers have worked with school districts across the country to switch over to propane models. More than 14,000 propane-powered school buses transport 700,000 students safely every day. In North Carolina, 8 propane-powered buses are already on the road, serving the communities in the counties of Davidson, Mecklenburg, and Randolph. Neighboring states are also embracing propane buses. GA has 301, SC-103, TN -22, and VA with 176 buses. It is important to highlight that as part of the Volkswagen Settlement, propane school buses are eligible for 100 percent of the replacement costs. This makes their adoption using these funds very attractive to school districts in North Carolina.

When considering the use of the Volkswagen settlement dollars, it is important to highlight potential NOx reductions. This is where propane-powered school buses are a winning choice for North Carolina. According to data from Argonne National Laboratory, if North Carolina were to replace all 13,538 eligible for this settlement with new, clean-burning propane models, there would be a 93 percent reduction in NOx. As an additional benefit, there would be a 99 percent reduction in particulate matter (PM) and a 91 percent reduction in tailpipe Volatile Organic Compounds (VOC).

Already in North Carolina, there are 3 school districts that have buses running on clean burning propane. Students on these buses are experiencing these clean air benefits. There is also the added advantage that propane buses are quieter than their diesel counterparts. When factoring in all of the benefits, there is no doubt that investing Volkswagen Settlement funds into propane powered school buses would be one of the most cost effective ways of reducing the excess NOx caused by Volkswagen.

In order to get this large propane supply to the consumer transportation market, the industry relies on a network of public and private refueling stations. Nationwide, there are more than 3,600 stations ready to supply consumers with propane. In North Carolina, there are already 106 public and private stations. NC is the 3rd largest user of propane in the country and we have more bulk plants and retail locations than any other state. There are propane dealers in all 100 counties in NC.

Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
JEFF HAYNES
Robert White
P.O. Box 40
Shallotte, NC 28459

December 14, 2017

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Sincerely,
Sherry Johnson
CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov.

Louise Williams
910 N Marine Blvd
Jacksonville, NC 28540

December 14, 2017

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Sincerely,
Louise Williams
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Keith Thompson
140 Bitmore Rd.
Whiteville, NC 28472

December 14, 2017

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Sincerely,
Keith Thompson
Kimberly Snyder
170 Sweeten Creek Road
Asheville, NC 28803

December 14, 2017

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BRENDA MCGREGOR
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Jay Little
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Sincerely,
Tammala Parris
Larry Mizell
703 S. George St.
Goldsboro, NC 27530

December 14, 2017

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Sincerely,
Larry Mizell
Daphanie Turner
4630 Hillsborough Rd
Durham, NC 27705

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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
Ed Hayes
Mike Gibney
1503 W Garner Rd
Garner, NC 27529

December 14, 2017

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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Sincerely,
Mike Gibney
Marsha Atwood
5301 High Street
Morehead City, NC 28557

December 14, 2017

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Sincerely,
Brad Loflin
James Piver  
1401 Kelly Place  
Newport, NC 28570

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Jeff Wade
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Lynn Cochran
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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,

tim rice
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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Ted Newton
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Sincerely,
Scott Prewitt
From: David Lipe
to: daq.NC_VWGrants
Subject: [External] Response to NC VW RFI
date: Wednesday, December 13, 2017 4:24:11 PM

David Lipe
170 Sweeten Creek Road
Asheville, NC 28803

December 13, 2017

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

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David Lipe
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Adam Wooten
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Sincerely,
michael obrien
From: Brenda Hall
To: daq.NC_VWGrants
Subject: [External] Response to NC VW RFI
Date: Wednesday, December 13, 2017 3:47:17 PM

Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

As a member of North Carolina's propane industry, I urge you to consider propane-powered vehicles in North Carolina's Volkswagen Environmental Mitigation Plan. The Volkswagen settlement presents a unique opportunity for our state to accelerate the adoption of environmentally-friendly alternative fueled vehicles. Propane marketers in North Carolina are ready to engage in your efforts to offset Volkswagen's excess emissions.

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Scott Hinkle
Scott Eggers
209 Jacob-Sarah Drive
Vilas, NC 28692

December 13, 2017

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Kenneth Green
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Ray Kazakewich
Dear North Carolina VW Settlement RFI North Carolina VW Settlement RFI,

As a member of North Carolina's propane industry, I urge you to consider propane-powered vehicles in North Carolina's Volkswagen Environmental Mitigation Plan. The Volkswagen settlement presents a unique opportunity for our state to accelerate the adoption of environmentally-friendly alternative fueled vehicles. Propane marketers in North Carolina are ready to engage in your efforts to offset Volkswagen's excess emissions.

Propane has a proven track record as a transportation fuel in fleets across the country. Right now, the Propane Education and Research Council (PERC) estimates that there are nearly 200,000 propane-powered vehicles on the road in the U.S. One of the most successful adoptions of propane vehicles has been school bus fleets. With the ability to install refueling apparatus cost effectively and easily on site, propane marketers have worked with school districts across the country to switch over to propane models. More than 14,000 propane-powered school buses transport 700,000 students safely every day. In North Carolina, 8 propane-powered buses are already on the road, serving the communities in the counties of Davidson, Mecklenburg, and Randolph. Neighboring states are also embracing propane buses. GA has 301, SC-103, TN -22, and VA with 176 buses. It is important to highlight that as part of the Volkswagen Settlement, propane school buses are eligible for 100 percent of the replacement costs. This makes their adoption using these funds very attractive to school districts in North Carolina.

When considering the use of the Volkswagen settlement dollars, it is important to highlight potential NOx reductions. This is where propane-powered school buses are a winning choice for North Carolina. According to data from Argonne National Laboratory, if North Carolina were to replace all 13,538 eligible for this settlement with new, clean-burning propane models, there would be a 93 percent reduction in NOx. As an additional benefit, there would be a 99 percent reduction in particulate matter (PM) and a 91 percent reduction in tailpipe Volatile Organic Compounds (VOC).

Already in North Carolina, there are 3 school districts that have buses running on clean burning propane. Students on these buses are experiencing these clean air benefits. There is also the added advantage that propane buses are quieter than their diesel counterparts. When factoring in all of the benefits, there is no doubt that investing Volkswagen Settlement funds into propane powered school buses would be one of the most cost effective ways of reducing the excess NOx caused by Volkswagen.

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Thank you for your consideration. If you have additional questions, you can contact the North Carolina Propane Gas Association at 919-787-8485.
Sincerely,
Phyllis Brown
jamie stokes  
682 haw branch church rd  
chocowinity, NC 27817  

December 13, 2017  

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Sincerely,
jamie stokes
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Sincerely,
Johnny Mabe
Anthony Sebastian
143 Thornecliffe Drive
State Road, NC 28697

December 13, 2017

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Sincerely,
Anthony Sebastian
CAUTION: External email. Do not click links or open attachments unless verified. Send all suspicious email as an attachment to report.spam@nc.gov.

Melinda Leonard  
388 Ridge Rd  
Mocksville, NC 27028  

December 13, 2017  

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Sincerely,
Melinda Leonard
Amy Dean  
PO Box 220  
Apex, NC 27502  

December 13, 2017  

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Sincerely,
Amy Dean, President L.G. Jordan Oil Co., Inc.
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Sincerely,
Brian Bertke
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Sincerely,
Darrin Shaffer
Charles Brown
303 W Veterans Drive
Goldsboro, NC 27530

December 13, 2017

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Charles Brown
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Jeff Ruffner
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John Jessup