

To: Tracy Babbidge
Planning & Standards
CT Department of Environmental Protection

Mr. Ariel Garcia
Air Pollution Control Engineer
CT Department of Environmental Protection

From: William D. Moore, CAE
Executive Director

Date: November 28, 2005

Re: School Bus Subcommittee Recommendations

The Board of Directors has met and reviewed the *Connecticut Clean Diesel Plan School Bus Sector Report* and has the following comments:

- The Connecticut School Transportation Association strongly urges the State DEP to follow the timelines and standards of the U.S. Environmental Protection Agency regarding the standards to be set for diesel engines, particularly as they apply to school buses.
- Members of the Connecticut School Transportation Association have expressed concerns that accelerating the standards may be a burden on manufacturers who may not yet have been able to engineer solutions to the new federal requirements. Additionally, some COSTA members have expressed concerns that retro-fitting vehicles may void manufacturers' warranties. This is an area that needs to be more fully explored by the DEP. Finally, the use of ULSD without the proper additives could affect vehicles' fuel pumps due to the lack of sufficient lubricity in ULSD.
- The Connecticut School Transportation Association believes that in the normal course of fleet turnover, the majority of the school bus fleet will attain the desired effect of the recommendations by 2012, and that the remainder will attain compliance by 2019.
- The Connecticut School Transportation Association strongly believes that the costs for upgrading and/or retro-fitting the fleets should not be borne by the carriers. Any mandated changes to contracts must allow for a pass-through (of the cost to meet state standards) to the school districts.
- The Connecticut School Transportation Association strongly believes that there should be incentives offered to school districts and carriers to turn over existing fleets.

- The Connecticut School Transportation Association strongly believes that consideration must be given to the impact that the use of ultra low sulfur diesel (ULSD) will have on the towns. Town tanks are used to fuel entire town-wide fleets including fire trucks, town trucks, emergency vehicles, etc. Will these vehicles now have to use ULSD? If so, who will be responsible for the additional costs to fuel these fleets? If not, there may be a problem with the cost of purchasing additional tanks to hold the ULSD. Additionally, there may be site problems, i.e., a lack of available space to hold the new tanks.

Thank you very much for allowing us the opportunity to review and comment on the Report.

Please feel free to contact me if you have any questions or concerns.