

## Webinar Q&A

### Acquiring Low Greenhouse Gas-Emitting Vehicles for Federal Fleets: Meeting EISA Section 141 Requirements through Successful Acquisition and Reporting

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Wednesday, October 24, 2012, 1:30-3:00 EDT

#### Presenters

- Kristin Kenausis and Susan Burke, Environmental Protection Agency (EPA)
- Ron Stewart, Idaho National Laboratory (INL)/Federal Automotive Statistical Tool (FAST)
- Sean Seymour, General Services Administration (GSA)
- Mark Reichhardt, U.S. Department of Energy (DOE)

**Q:** Am I correct in understanding that the compliance level will change from year to year? Will the compliance level information for a particular year be maintained on the website for purchases of used vehicles?

**A:** [From EPA] Yes, the compliance levels are likely to change from year to year. EPA will annually determine the maximum allowable tailpipe carbon dioxide (CO<sub>2</sub>) emissions in grams per mile for cars and trucks based on an analysis of the fleet for the prior model year. Our goal is to designate approximately 25% of cars and 25% of light-duty trucks/medium-duty passenger vehicles (MDPVs) as low greenhouse gas (GHG)-emitting vehicles.

EPA plans to issue Energy Independence and Security Act (EISA) Section (§) 141 criteria in January prior to the start of the model year; i.e., Model Year (MY) 2014 thresholds will be released in January 2013. Thresholds for previous model years will be maintained on the website.

**Q:** How will our legacy fleet (pre-2013) be judged with respect to EISA § 141? Will these vehicles count against us?

**Q:** When is a district/office responsible for compliance if we still have 2009–2012 vehicles?

**A:** [From EPA] EISA § 141 applies to motor vehicles acquired after the original guidance document was issued on February 22, 2010. For all covered vehicles acquired after that date, EPA recommends that each agency maintain data or information demonstrating compliance with EISA § 141, including vehicles acquired under each exception, for at least five years and/or in accordance with agency-specific recordkeeping requirements. For more information on recordkeeping and reporting, see Sections X, XVIII, and XIX of the [EISA Sect. 141 Guidance](#) document. (Note: The criteria for determining which vehicles qualify as low GHG-emitting are specific to the model year. Applicable criteria for past model years will be maintained on EPA's website.)

EPA does not plan to publicize FAST data on EISA § 141 compliance for MY 2011 and earlier vehicle acquisitions.

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**Q:** What vehicle type acquisition options are available for medium-duty alternative fuel trucks, preferably electric?

**A:** [From GSA] The various alternative fuel vehicle (AFV) offerings can be found using the GSA Automotive [Alternative Fuel Vehicle Purchasing Guide](#). Leasing customers can use the GSA [Alternative Fuel Vehicle Leasing Guide](#).

**Q:** How does one go about determining the CO<sub>2</sub> emissions of a foreign vehicle acquired for use in a foreign country?

**Q:** Does GSA have an AFV Leasing Guide for foreign vehicles to help identify EISA § 141 compliant vehicles?

**A:** [From EPA] Vehicles manufactured for sale outside the U.S. are beyond the scope of EISA § 141. Automakers are not required to submit emissions data to EPA for vehicles that will not be sold in the U.S. market.

**Q:** Although only newly acquired vehicles need to report for low GHG compliance, do all gas vehicles need to specify between GAS and GAS alternative fuel (AF) (which means it's a low GHG vehicle)?

**A:** [From INL/FAST] From the standpoint of consistency across the different slices of data reported to FAST (acquisitions, inventory, and disposals), we recommend that any vehicle reported as an acquisition which qualifies for the use of the "AF" fuel type also be reported in inventory in the same manner. (Note: The AF fuel type is used to denote dedicated petroleum-fueled low GHG (LGHG) vehicles operating in locations where DOE would approve them for Energy Policy Act (EPA) 2005 § 701 waivers based on lack of alternative fuel availability). From the same standpoint of consistency, these vehicles should be reported with the AF fuel configuration for as long as it remains appropriate based on availability of alternative fuel in the location where the vehicles are operating, up through and including the year in which they are disposed.

**Q:** When will FAST have the choices for EISA?

**A:** [From INL/FAST] The data entry forms and import capability for reporting vehicle acquisitions currently have all of the logic in place to support EISA § 141 reporting as shown in the slides during the webinar. EISA § 141 reporting was originally implemented in support of the Fiscal Year (FY) 2010 annual data call. The changes made this year have been primarily to "tune" the characterization of the different sets of choices for designating how vehicles are characterized in terms of compliance versus exceptions versus nonapplicability.

**Q:** When are these charts/graphs/comparisons going to be added to the Data Quality & Consistency Report?

**A:** [From INL/FAST] The additional data views covering EISA § 141 reporting for the FAST Data Quality & Consistency report are slated for deployment during the week of October 29, 2012.

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**Q:** If you buy a car that has a CO<sub>2</sub> score of 100, for example, which is 230 CO<sub>2</sub> grams under the EISA threshold of 330, can you use that extra “credit” of 230 CO<sub>2</sub> grams to buy vehicles that are over the 330 CO<sub>2</sub> threshold, up to the point where the noncompliant CO<sub>2</sub> score would match the 230?

**A:** [From EPA] The alternative measures exception allows an agency to acquire a vehicle that is not low GHG-emitting if the agency offsets the incremental increase of petroleum consumption and GHG emissions. One way to offset this increase is to acquire one or more vehicles with lower tailpipe CO<sub>2</sub> emissions than the applicable EISA § 141 compliance threshold. For example, if an agency acquired a MY 2013 passenger vehicle with a tailpipe CO<sub>2</sub> emissions rate of 230 grams/mile (100 grams/mile under the compliance threshold), it could also obtain a MY 2013 passenger vehicle that emits 430 grams of CO<sub>2</sub> per mile, or two MY 2013 passenger vehicles that emit 380 grams/mile.

To most effectively use the alternative measures exception and determine the necessary offsets, EPA encourages agencies to assess the aggregate GHG emissions from their light-duty motor vehicle and MDPV acquisitions annually. EPA’s [Regulations & Standards: Federal Fleets](#) website contains an [EISA Sect. 141 Vehicle GHG Assessment Tool](#) that can be used for this purpose.

**Q:** Why is diesel not talked about; would diesel-fueled vehicles be more compliant or less?

**A:** [From EPA] As for other types of MY 2013 and later vehicles, agency fleet managers can determine if a particular diesel-fueled vehicle qualifies as low GHG-emitting by comparing its tailpipe CO<sub>2</sub> emissions to the applicable EISA § 141 compliance threshold, i.e., 330 grams/mile for MY 2013 passenger cars and 415 grams/mile for MY 2013 light-duty trucks and MDPVs. You can find a vehicle’s tailpipe CO<sub>2</sub> emissions rate on the [FuelEconomy.gov](#) website.

Alternately, you can find out if a particular vehicle has been designated as low GHG-emitting by checking EPA’s [Model Year 2013 Low Greenhouse Gas Emitting Vehicles](#) list. This list is updated on a monthly basis, as new vehicles enter the market throughout the model year.

Of note: Diesel fuel has a higher carbon content per gallon than gasoline so for two vehicles with the same fuel economy, the diesel-fueled vehicle would have higher tailpipe CO<sub>2</sub> emissions. However, diesel-fueled vehicles tend to have higher fuel economy (which reduces CO<sub>2</sub> emissions) than comparable gasoline vehicles. Agencies should check to see if the specific diesel-fueled vehicle they intend to acquire qualifies as low GHG-emitting.

**Q:** Can we still purchase diesel-fueled GSA vehicles?

**A:** [From GSA] Diesel- and biodiesel-capable vehicles are available for both purchase and lease through GSA Automotive and Fleet. You may consult the Alternative Fuel Purchasing or Leasing Guide for biodiesel offerings, or contact your local fleet service representative or CARS (703-605-2277) line representative for further information.

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**Q:** Are long-term vehicle leases from GSA considered acquisitions with regards to meeting EISA § 141 compliance?

**A:** [From EPA] EISA §141 prohibits Federal agencies from acquiring—defined as purchasing, leasing, or acquiring through transfer, including replacement vehicles—light-duty motor vehicles and MDPVs that are not low GHG-emitting vehicles. So, yes, it would apply to vehicle leases from GSA. EISA § 141 does not, however, apply to short-term rental vehicles.

**Q:** Why aren't most vehicle attributes tied to year/make/model on FAST's back end so that a fleet manager can simply state they acquired X number of Chevy Cruz, and the type and attributes of vehicle are auto-populated? Seems that could help mitigate any manual data entry errors, in addition to the quality checks already in place.

**A:** [From INL/FAST] There are several reasons such an approach is not currently implemented in FAST:

- The FAST management team tends to take a conservative approach to interpreting the data collection mandates from the various sources of requirements such as legislation and executive orders. None of those requirements that underpin FAST have been interpreted at present in such a way that would necessitate agencies to submit that level of detail.
- Make and model, in the example given, would not be sufficient to determine all of the required attributes as most vehicles are offered with a variety of drive trains, engine sizes, fuel configurations, and other options. These would also have to be provided by the agencies in order to infer all of the corresponding attributes such as tailpipe emissions, and all of that data changes from year to year. Populating and maintaining that dataset for all available vehicles that might appear in the Federal fleet is simply not feasible.

**Q:** If we have E85 flex-fuel vehicles but are unable to access E85 to fuel the vehicle, how do we report this?

**Q:** E85 fuel is unavailable in our area, is this okay?

**A:** [From EPA] In locations where E85 fuel is not available, agencies should determine if a flex-fuel vehicle qualifies as low GHG-emitting based on its emissions while operating on gasoline. You can find the tailpipe CO<sub>2</sub> emissions for gasoline operation on the [FuelEconomy.gov](http://FuelEconomy.gov) website. For MY 2013 vehicles, passenger cars must emit less than 330 grams CO<sub>2</sub>/mile and light-duty trucks and MDPVs must emit less than 415 grams CO<sub>2</sub>/mile to be EISA § 141 compliant.

If an agency plans to acquire a flex-fuel vehicle that is not low GHG-emitting, the agency must take one of the two allowable exceptions (functional needs or alternative measures) and report it accordingly.

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**Q:** What is the definition of a light-duty truck? What is the gross vehicle weight rating (GVWR) limit?

**Q:** Does EISA § 141 only include light-duty Class 2 trucks (GVWR 6,001 to 10,000 lb), or larger-class trucks as well?

**Q:** Do EISA § 141 compliance requirements include all classes of trucks, or only light-duty trucks that are less than 10,000 lb GVWR? If yes, could a Federal agency receive credit toward its compliance if it were able to obtain medium-duty or heavy duty trucks that are low GHG-emitting vehicles?

**Q:** Will the 2013 acquisitions threshold take into consideration medium and heavy duty pickup trucks?

**A:** [From EPA] EISA § 141 applies to new acquisitions of light-duty motor vehicles and MDPVs. Section 301(11) of EPA Act 1992 (42 U.S.C. § 13211(11)) defines light-duty motor vehicles to include both light-duty vehicles and light-duty trucks as defined by 40 C.F.R. § 86.1803-01. Therefore, for the purposes of EISA § 141, the term light-duty motor vehicle includes passenger cars, and, depending on their GVWR, pickup trucks, minivans, passenger vans, and sport-utility vehicles. Vehicles with a GVWR between 8,500 lb and 10,000 lb designed to transport primarily persons are MDPVs as defined by 40 C.F.R. § 86.1803-01. Heavy-duty trucks (e.g., pickup trucks and nonpassenger vans over 8,500 lb GVWR or 6,000 lb curb weight) are outside the scope of EISA § 141.

**Q:** For GSA: With the introduction of more vehicles that are compliant, are the incremental costs for AFVs decreasing?

**A:** [From GSA] The incremental cost of a vehicle is defined under EPA Act 1992 and 2005 as the price difference between an AFV and the low cost comparable gasoline-fueled vehicle. The value of this incremental change is based on the awarded contract prices of vehicles from GSA's yearly open and competitive vehicle solicitation. Some vehicle classes, like GSA's SIN 9C four-door, five-passenger sedans have lower incremental prices today than they have in years past.

**Q:** I need some help with the requirements to order a compressed natural gas (CNG) vehicle through GSA. I have a CNG gas pump on station.

**A:** [From GSA] Purchase customers are able to procure CNG vehicles using the GSA AutoChoice program. Leasing customers will need to order vehicles through their local fleet service representative.

**Q:** Are you able to report low GHG-emitting vehicles already in inventory or just future acquisitions?

**A:** [From INL/FAST] Because the EISA § 141 requirement is focused on vehicles acquired by Federal fleets, FAST requires agencies to designate the EISA § 141 compliance of all acquisitions for the fiscal year that just ended. For all other sections of the FAST data submission covering the vehicles already in inventory, disposals, and projections for out-year acquisitions and disposals, the underlying acquisition requirement and the reporting requirement are not applicable.

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**Q:** Where can we find the current GSA alternative fuel and EISA § 141 complaint vehicle guide? Where can we find the list of EISA § 141 complaint vehicles for previous and current years?

**A:** [From EPA/GSA] The guidance document for EISA § 141 and the list of EISA § 141 compliant vehicles are available on EPA's [Regulations & Standards: Federal Fleets](#) website.

You can also access this information from DOE's [Sustainable Federal Fleets](#) website.

The GSA-provided alternative fuel vehicle offerings can be found using the GSA Automotive [Alternative Fuel Vehicle Purchasing Guide](#). Leasing customers can use the GSA [Alternative Fuel Vehicle Leasing Guide](#).

**Q:** If I have a vehicle that I know is ready to be picked up for 2013 and has a tailpipe CO<sub>2</sub> emissions rate of 286 grams/mile, can I ask GSA to replace it or do I take the hit and get no vehicle?

**A:** [From EPA] For MY 2013, passenger cars that emit 330 grams CO<sub>2</sub>/mile or less and light-duty trucks and MDPVs that emit 415 grams CO<sub>2</sub>/mile or less qualify as low GHG-emitting for the purposes of EISA § 141. Therefore, a MY 2013 vehicle with tailpipe CO<sub>2</sub> emissions of 286 grams/mile is EISA § 141 compliant.

**Q:** I thought GSA entered information into FAST for our leased vehicles. Is that correct or will I need to enter it?

**A:** [From GSA] GSA provides FAST information on a customer's GSA leased fleet through the [GSA Drive-thru](#) portal. This information is provided to the customer in a format that is ready for FAST upload. It is the responsibility of the customer, however, to verify and enter their own information into FAST.

**Q:** Would a 2013 Dodge Grand Caravan LD Passenger van, E85-capable, be compliant?

**A:** [From EPA] This vehicle would be EISA § 141 compliant only if operated on E85. See EPA's [Model Year 2013 Low Greenhouse Gas Emitting Vehicles](#) list—compliant FFVs (when operated on E85) can be found toward the bottom of the list.

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**Q:** There is a conversion factor for E85 to GGE, somewhere around 0.82 gallon of E85 = 1.00 gallon of gasoline. I assume that the CO<sub>2</sub> emissions factor for an E85 vehicle is greater than that of a gasoline gallon, since the fuel is cleaner. What is the breakeven point for this conversion, such that we'll know when consuming too much E85 begins to emit more emissions as a whole, because of the drop in efficiency?

**A:** [From EPA] The [FuelEconomy.gov](http://FuelEconomy.gov) website shows the tailpipe CO<sub>2</sub> emissions in grams per mile for flex-fuel vehicles separately for gasoline and E85 operation. You can compare these estimates for a specific vehicle to determine which fuel will result in lower emissions.

For the purpose of complying with EISA § 141, the maximum allowable CO<sub>2</sub> emissions threshold depends on the fuel on which you intend to operate the flex-fuel vehicle, i.e., 330 grams/mile for gasoline operation or 375 grams/mile for E85 operation in the case of passenger cars.

**Q:** When we come up with the [CO<sub>2</sub>] grams (i.e., 100), how do we know what the grams of our FY 2012 vehicles and earlier are to come up with our grand total of grams?

**A:** [From EPA] The applicable EISA § 141 compliance criteria are based on the model year of the vehicle. For MY 2012, passenger cars with a GHG rating of 7 or higher and light-duty trucks and MDPVs with a GHG rating of 6 or higher on EPA's [Green Vehicle Guide](http://GreenVehicleGuide) website are considered low GHG-emitting (flex-fuel vehicles operating on E85 qualify with a one-point lower score). See the Green Vehicle Guide website for more information on criteria for MY 2012 and earlier vehicles. A MY 2013 vehicle acquired in FY 2012 would be subject to the [criteria](#) for MY 2013, which are based directly on tailpipe CO<sub>2</sub> emissions.

EPA has developed the [EISA Sect. 141 Vehicle GHG Assessment Tool](#) to help agencies aggregate GHG emissions for MY 2012 and MY 2013 vehicles acquired in the same fiscal year, or other acquisition cycle, and determine overall EISA § 141 compliance.

**Q:** Are the Ford dedicated propane-fueled pickups still available from GSA? And how do they fit into the EISA guidelines?

**A:** [From GSA] These vehicles are currently available through GSA. You can check current vehicle availability using GSA's [Vehicle Availability Listing](#). The dedicated propane-fueled pickup trucks offered through GSA exceed the light-duty vehicle threshold, and so are not mandated to meet the grams of CO<sub>2</sub> per mile limit set by EPA.

[From EPA] As with other fuels, agencies can determine if a MY 2013 or later vehicle is low GHG-emitting by comparing its tailpipe CO<sub>2</sub> emissions in grams per mile (available at [FuelEconomy.gov](http://FuelEconomy.gov)) to the applicable EISA § 141 threshold. Heavy duty trucks (e.g., pickup trucks and nonpassenger vans over 8,500 lb GVWR or 6,000 lb curb weight) are outside the scope of EISA § 141. If propane pickup trucks under 8,500 lb GVWR become available, they would have to comply.

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**Q:** Are GSA fleet representatives steering Federal fleet managers toward low-GHG vehicles?

**A:** [From GSA] GSA fleet service representatives are working closely with customers to ensure that all fleets are aware of required mandates, and providing vehicle suggestions that will help customers comply with all of their requirements.

**Q:** Is GSA thinking of incorporating the incremental costs into the monthly lease costs?

**A:** GSA Fleet does offer full replacement lease rates on a limited number of vehicles. Please speak with your local fleet service representative to find out about availability.

**Q:** Are there still incremental costs for Army organizations?

**A:** Incremental cost is identified by vehicle, and is not specific to any agency. You can view the incremental cost of a vehicle using the GSA Automotive [Alternative Fuel Vehicle Purchasing Guide](#). Leasing customers can use the GSA [Alternative Fuel Vehicle Leasing Guide](#).

**Q:** How do I reconcile the model year versus the EPA emissions rating gap? Vehicle model year begins in September/October of the previous calendar year and the EPA rating guide is published in January; what if I purchase a vehicle in October? How will I obtain an emissions rating?

**A:** [From EPA] EPA plans to issue EISA § 141 criteria in January prior to the start of the model year (i.e., MY 2014 thresholds will be released in January 2013), so the applicable thresholds should be posted on EPA's [Regulations & Standards: Federal Fleets](#) website before vehicles are available for sale. If you intend to acquire a vehicle for which the tailpipe CO<sub>2</sub> emissions rate or the applicable EISA § 141 criteria are not available, please contact EPA.