

National Renewable Energy Laboratory

1617 Cole Boulevard
Golden, Colorado 80401-3393
(303) 231-1000



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FHWA Docket No. MC 92-4
Room 4232
HCC- 10
Office of Chief Counsel
Federal Highway Administration
400 Seventh Street SW
Washington, DC 20590

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FHWA-97-2180-23

Subject: Federal Motor Carrier Safety Regulations; Transportation of Hazardous Materials, Federal Register Vol 58, No. 115, Thursday, June 17, 1993, pages 33418-33425 (Proposed Rules)

Dear Chief Counselor:

Regarding the subject proposed rules including regulation of liquefied natural gas (LNG), it is our professional opinion that LNG should not be included within the same regulatory requirements as explosives, toxic gasses, and radioactive materials. LNG should be regulated under the same criteria that are used for other transportation fuels such as gasoline and diesel fuel.

As Field Manager for the U.S. Department of Energy Alternative Fuel Utilization Program (AFUP), the National Renewable Energy Laboratory considers LNG as a viable candidate for replacing conventional fuels such as gasoline and diesel fuel. There are several demonstration projects now underway in the country where LNG is effectively being used. LNG offers a great potential for improved air quality and reduced dependence on foreign oil supplies.

Including LNG in a category requiring additional transportation control would unduly hamper its further development. LNG has a lower energy density than gasoline or diesel fuel and can be transported as safely as other transportation fuels. Therefore we strongly recommend that LNG be considered under a transportation fuel category and not under the currently proposed rule.

Yours truly,

Brent K. Bailey
Brent K. Bailey
Fuels Utilization Program
Alternative Fuels Division

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