



# ACC Position on C13 Timing

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October 27, 2005



# C13 Assumptions

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- Ten C13 stands available in the industry
- One month per test → ten tests per month
- 30% to 50% pass rate

→ Three to five passes per month



# C13 Assumptions – Best Case

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- 36 passes required if full BOI/VGRA guidelines are granted
    - All BOI/VGRA guidelines roll over from the Cat 1R to the C13 by 1/1/2006
- Seven to twelve months to complete



# C13 Assumptions – Mid Case

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- 73 passes required if only C13 BOI guidelines are granted
    - Full BOI guidelines in place by 1/1/2006
    - No VGRA guidelines are granted for the C13
- ➔ Fifteen to twenty-four months to complete



# C13 Assumptions – Worst Case

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- 223 passes required without enabling C13 guidelines
  - No BOI guidelines are granted
  - No VGRA guidelines are granted

➔ Four to six years to complete



# Considerations

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- Without testing relief for the C13 test:
- The October 2006 deadline requested by EMA will be missed by several years
- All oil marketers will be affected



# A Proposed Solution

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- Agree Caterpillar C13 BOI/VGRA guidelines through the API BOI/VGRA Task Force
  - Perhaps in conjunction with existing Caterpillar 1P BOI/VGRA guidelines
- If this is not successful, seek Caterpillar C13 testing relief through the HDEOCP