

Subject: Biodiesel Research Study
From: "Kimura, Ken" <Ken.Kimura@bp.com>
Date: Tue, 16 Jan 2007 00:33:26 +0000
To: Gary Yee <gyee@arb.ca.gov>

Hi Gary, I have a few comments and questions for you on this study.

- 1) How will you select the vehicles/engines to be tested?
- 2) Will the off-road vehicles be tested using the same duty cycles as the on-road vehicles? If so, that may not be appropriate due to significant difference between on-road and off-road.
- 3) As one of the biodiesel blend stocks, I would suggest considering a biodiesel produced from a mixture of feedstocks which is what is currently being produced in California. May want to consider the societal implications of the production of Palm Oil as that will be an imported product.
- 4) Suggested engine choices for HD On-road: A 2007 model year engine should be one of the engine choices and should be tested with the aftertreatment system intact as manufactured. A second engine should have EGR. The third engine can be any pre-EGR engine preferably not the 1990's DDC Series 60.
- 5) Recommend speciating the PM and performing a full particle size distribution for both the biodiesels and the ULSD.
- 6) Given the fact the B5 will likely be more prevalent due to OEM acceptance, it is still important to test B5 for it's emissions impact. BP would like CARB to reconsider doing B5. If funding is limited, B5 would still be preferred over a B50
- 7) How and when will operability and analytical issues be addressed? Will they be addressed in this study as well?

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