

June 16, 2020

Ms. Rajinda Sahota
California Air Resources Board
1001 I ST
Sacramento, CA 95814

Subject: Public Comment Submission in Response to CARB's June 4, 2020 Webinar

Dear Rajinder:

CARB's "Single-Engine Certification Testing" proposal, based on our viewpoint, will not provide the basis to "...ensure the efficacy of NOx-mitigating additives ..." for a number of reasons. This public comment submission is intended to identify our reasoning, but more importantly to propose an alternate method whereby CARB can better achieve the desired outcome as it pertains to VESTA®.

Locating three (3) Cummins ISM370 engines at facilities with adequate experience, available for immediate access and subsequent testing (especially in light of the COVID-19 pandemic) will prove difficult and take considerable time, far longer than the proposed regulation implementation date. As CARB knows, some have struggled to obtain CARB ISM. All ADF data developed to date has been based on the Detroit Diesel Series 60 and before any engine change is required by CARB, there should be a better understanding as to the underlying science behind NOx emissions variations from facility to facility. It's important to do so for many reasons but one in particular that stands out is CARB's sound science requirement.

We are also troubled by the incongruity between CARB's overall mission and the proposed particulate matter (PM) triggers. Use of particulate matter (PM) emissions as a criteria to evaluate engine repeatability, "... within 2 percent of the PM emissions from their acceptability testing or the certification would not be considered valid", means that any favorable impact VESTA® has on PM may in fact work to its detriment but should be allowed. By way of example, when testing VESTA®, up to an additional 6% PM reduction was achieved versus an unadditized B20. CE-CERT's March 2020 Report supports this favorable PM impact wherein VESTA® improved unadditized B20 PM 2.3-3.3%. Oppositely, CARB's testing of DTBP indicated that DTBP provided 8% less PM benefit than unadditized B20 which should not be allowed.

California Fueling has EPA registration of VESTA® 2000, a DTBP based product. Our EPA approved treat is 2500 ppm, which has been capped by the EPA. While CARB has maintained its approval of DTBP, it is not a practical solution. 100% DTBP cannot be shipped in tank trucks, which at the CARB approved level of 1% in B20 or 5% in B100, would be required. Accordingly,

