

From: Jake
To: ARB Fuels Program
Subject: Feedback from ADF Additive Testing meeting
Date: Friday, December 20, 2019 7:16:50 AM

Our company has invested significant resources and time over the past two years developing an additive for NOx mitigation in B20 blends. We have followed the protocol exactly including the chain of custody as newly proposed. Our experience shows there are many variables that already exist in the testing protocol. We would support what Best Corp suggested at the meeting about fuels for testing potentially being sourced at a single time for every company wanting to test. This would mean one standard fuel sourced from California meeting protocol specifications. We would add that a lab be chosen to preform the testing. As was mentioned by CARB at the meeting, round robin testing of engines or fuels in the past has produced differing results. We fully understand the reasoning behind the meeting and proposed changes to protocol due to what has transpired between the two competitors as well as the follow up testing. However, by adding additional fuels and secondary testing many more variables factor into the results which in turn has great potential to produce inconsistency. We believe we have a product which can pass the protocol, but wanted to add our thoughts based on experiences with the testing over the past two years.

We appreciate the opportunity and ability to make comments and suggestions.

Thank-you,

Jake Frank