Comment 1 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Neil
Last Name: Prescott
Email Address: klsengr2@gmail.com
Affiliation: KLS Engineering Co. Inc.

Subject: Proposed Amendments to Alt. Fuel Conversion Procedures for Vehicles and Engines
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/com-attach/1-altfuel2013-Uz0HZFw0VWoGX1Ag.pdf

Original File Name: Neil Prescott.pdf

Date and Time Comment Was Submitted: 2013-08-16 09:11:53

No Duplicates.

Comment 2 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Neil
Last Name: Prescott
Email Address: klsengr2@gmail.com
Affiliation:

Subject: email from Neil Prescott
Comment:

Attachment: www.arb.ca.gov/lists/com-attach/2-altfuel2013-AWwAY1UxByBWOVM9.pdf

Original File Name: MEETING - 8_22_2013, MITCHELL, RIORDAN.pdf

Date and Time Comment Was Submitted: 2013-08-20 09:09:36

No Duplicates.

Comment 3 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: George
Last Name: Malouf
Email Address: georgemalouf76@gmail.com
Affiliation: California Environmental Engineering

Subject: HD Diesel Conversions
Comment:

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For certification, ARB currently requires multiple tests for
heavy-duty diesel conversions to alternative fuels. This is true
for either dedicated alt fuel or dual-fuel (diesel-alt fuel
mixture) conversions. These test cycles are run on a HD engine
dynamometer and include Federal Test Procedure (FTP), European
Stationary Cycle (ESC), Not-to-exceed (NTE) and Supplemental
Emission Test (SET). US EPA requires only the FTP. CEE believes
that this additional cost, up to four times, is a significant
barrier to companies who wish to certify their systems in
California.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-08-27 10:10:53

No Duplicates.

Comment 4 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Todd
Last Name: Trauman
Email Address: TODD.TRAUMAN@CARBONBLU.COM
Affiliation:

Subject: ARB Alternative Fuel Proposal Comments from CarbonBlu, LLC.
Comment:

See Attachment

Attachment: www.arb.ca.gov/lists/com-attach/5-altfuel2013-AmNWIgBjWVVWMQRo.pdf

Original File Name: ARB Alternative Fuel Proposal Comments from CarbonBlu, LLC..pdf

Date and Time Comment Was Submitted: 2013-09-10 14:31:49

No Duplicates.

Comment 5 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 6 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Mark Gordon
Last Name: Cooper
Email Address: marksman954@aol.com
Affiliation: Chief Science Officer for "CAFE"

Subject: "CAFE" is Clear Air and Fuel Efficiency, we have solved Zero Emissions
Comment:

In the field of accomplishing "Zero Emissions" many companies, just accomplish only so much, I am CSO, for the "CAFE Package Cortel" which is a group of companies, which I am the Nucleus, which have joined together to bring a "100% Solution For Zero Emissions" in all internal combustion engines. One of our contributor, has the CARB Certification and a US Patent. We combine our expertise to address all aspect of the equation of internal combustion engines, so that all six elements are addressed with all individual components of each company which is part of the "CAFE PACKAGE Cortel". We have a Package of devices, chemicals, lubricates and computer calibration programs which can accomplish over 100 MPG in vehicles, decrease emissions to 99% and calibrate the ECM in the vehicles to continuously monitor the emssions to get to "Zero Emissions" over time and keep it there. This is not a "Magic Wand" type solution, it is various companies which inject a piece from each of their solutions, combine together in the "CAFE Package" which stands for "Clear Air and Fuel Efficiency" package. If your board is going to accomplish "Zero Emissions" and "Reduce Fuel Consumption" which all contribute to the issue while increasing commerce within your City at the same time, it is a complex problem and will take a concentrated solution.
I, Mark Gordon Cooper, have the complete package of devices and elements to accomplish the complete solution.
I live in Phoenix, Arizona and would consider reporting to the committee, for the reimbursement of gasoline from Phoenix to your location in CA. If over night should need to occur, it would be the board's responsibility to over night my stay.
We have some of our devices in the LA Yellow Car system, we have many elements installed in Winabago County New Jersey and we have US Senate support for the US Patented Smart Emission Reducer which carries your own CARB certification.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-09-17 09:47:11

No Duplicates.

Comment 7 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 8 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Kenny
Last Name: Kerstiens
Email Address: kennyk@cftglobal.com
Affiliation:

Subject: Alternative fuel
Comment:

The addition of our alternative fuel system; the Pressure Induced Gas Generator, has proven to reduce diesel fuel consumption, CO, and NOX emissions. The volume of gas fed into the engine is less than 1% of the total stock air-fuel combination. The system has proven to reduce or completely eliminate the need for DPF regenerations, and has also eliminated imminent service from DPF and High NOX warning lights were illuminated. The system has been installed on heavy use trucks with loads as high as 100,000lbs for periods of over 1year and 100,000 miles with 0 DPF forced regenerations or EGR service required. Help us get this implemented in CA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-09-23 11:37:22

No Duplicates.

Comment 9 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: Karen
Last Name: Szabo
Email Address: KSzabo@ImpcoTechnologies.com
Affiliation: IMPCO Technologies

Subject: Comments re: the Proposed Amendments to the Alt Fuel Cert Procedures (IMPCO Technologies)
Comment:

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See the attached.
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Attachment: www.arb.ca.gov/lists/com-attach/11-altfuel2013-Un8CW1VlUzNSZFNq.pdf

Original File Name: - 130923 Comments re ARB Proposed Amendments to the Aftermarket Cert Procedures.pdf

Date and Time Comment Was Submitted: 2013-09-24 07:58:46

No Duplicates.

Comment 10 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 45 Day.

First Name: TODD
Last Name: LAPANT
Email Address: TLAPANT@TRANSFERFLOW.COM
Affiliation: TRANSFER FLOW INC

Subject: Comments on Amendments to the Alternative Fuel Vehicle Conversion Certification Procedures
Comment:

25 September 2013
Mr. Craig Duehring
California Air Resources Board
1001 I Street
Sacramento, CA 95814
RE: Comments to the Amendments to the Alternative Fuel Vehicle Conversion Certification Procedures for On-Road Motor Vehicles and Engines.
Mr. Duehring,
Transfer Flow Incorporated appreciates that the California Air Resources Board has listened to the suggestions from industry and is willing to work with industry to increase the availability of Alternative Fuel Vehicles in California. Transfer Flow Inc. has and will continue to work with CARB to ensure that regulatory actions keep pace with technology while maintaining feasibility for businesses.
Transfer Flow Inc. supports CARB's efforts to streamline the certification process for AFV's in California however Transfer Flow Inc. disagrees with some of CARB staffs assertions. To continue to require durability testing on vehicles and components that are past their useful life is an overreach regulatory action. If a vehicle is past its expected useful life and is able to pass the State approved testing at a Bureau of Automotive Repair licensed state inspection facility then such a vehicle should be able to be converted without any further regulatory intervention. Similarly, the requirement that any credit generating converted vehicle must be inspected by a BAR Referee prior to releasing the vehicle to the consumer is not feasible.
While Transfer Flow Inc. agrees that technologies are continuously advancing, the justification for the use of a sunset provision to eliminate many of the proposed streamlining measures due to lower emissions standards taking effect in the 2018 Model Year is not true streamlining. Since lower emissions standards will be the new requirement in 2018, AFV's will continue to have to meet the new lower standards for newer model year vehicles. Requiring more stringent certification measures in 2018 for AFV's will not change the emissions standards that the converted vehicles have to meet, but rather will cause the same situation we currently find ourselves in where conversion manufacturers are unable to meet certification requirements in a timely cost effective manner.
Transfer Flow proposes the elimination of the sunset provision as a "safety net to contain potential emissions impacts". Any such emissions impacts would be discovered by the safety net already in

place through emissions inspection and testing at the biannual vehicle testing at BAR licensed state emissions testing facilities.
Furthermore Transfer Flow Inc. proposes the ability to use aggregate durability testing for certification. Data from multiple converted vehicles that have like systems installed with similar initial miles prior to conversion with different driving use, and therefore different accumulated mileage after conversion, would adequately prove the required durability testing.

Transfer Flow Inc. looks forward to the outcome of CARB's consideration of the amendments to the certification requirement for AFV's in California and appreciates the opportunity to comment on the proposed changes.

Sincerely,

Todd LaPant P.E.
Director of Engineering
Transfer Flow Incorporated
1444 Fortress St.
Chico CA 95973

Attachment: www.arb.ca.gov/lists/com-attach/12-altfuel2013-BmVUPQRoWGZRMgln.docx

Original File Name: Comments to Proposed CARB AFV Changes.docx

Date and Time Comment Was Submitted: 2013-09-25 11:25:17

No Duplicates.

Comment 1 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013). (At Hearing)

First Name: David
Last Name: Cox
Email Address: david@RNGCoalition.com
Affiliation:

Subject: The Coalition for Renewable Natural Gas
Comment:

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Please see attached comment.
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Attachment: www.arb.ca.gov/lists/com-attach/13-altfuel2013-BnRRMgBvUWcEdVIz.pdf

Original File Name: Renewable Natural Gas David Cox.pdf

Date and Time Comment Was Submitted: 2013-09-27 09:07:27

No Duplicates.

Comment 2 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013). (At Hearing)

First Name: John
Last Name: Reed
Email Address: jreed@northamericanrepower.com
Affiliation:

Subject: North American Repower
Comment:

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Please see attached comment.
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Attachment: www.arb.ca.gov/lists/com-attach/14-altfuel2013-UD5TOlAjUXYCbAdY.pdf

Original File Name: North American Repower John Reed.pdf

Date and Time Comment Was Submitted: 2013-09-27 09:07:27

No Duplicates.

Comment 1 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 15-1.

First Name: Peter
Last Name: Ward
Email Address: peterfward@att.net
Affiliation: Alternative Fuels Advocates, LLC

Subject: Alternative Fuel Conversion Certification Procedures
Comment:

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See attachment.
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Attachment: www.arb.ca.gov/lists/com-attach/15-altfuel2013-VDYHbgBgWHkFZ1QL.pdf

Original File Name: Board letter-Cert of AFVs101113final.pdf

Date and Time Comment Was Submitted: 2013-12-09 10:37:49

No Duplicates.

Comment 2 for Alternate Fuel Conversion Certification Procedures for On-Road Vehicles (altfuel2013) - 15-1.

First Name: Gary
Last Name: Fanger
Email Address:
Affiliation: Cenergy Solutions

Subject: Public Comment for the Approved Amendments
Comment:

See Attachment.

Attachment: www.arb.ca.gov/lists/com-attach/17-altfuel2013-WjkCYVM8VGIGclI1.pdf

Original File Name: cenergy15daycomment.pdf

Date and Time Comment Was Submitted: 2013-12-09 10:42:20

No Duplicates.