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Clerk of the Board
Air Resources Board
1001 "I" Street
Sacramento, CA 95814

VIA FAX SUBMITTAL ONLY

RE: **AB 32 Scoping plan comment - December 11, 2008 meeting**

Dear Board:

Scoping plan items 5 to 15, pages 46 to 63 can easily be accomplished by implementing orderly bi-fueling of vehicles with ON THE FLY produced Hydrogen **with a closed loop system supplementally designed to cooperate seamlessly with existing OEM system on most engines.** HOWEVER, some enforcement "teeth" need to be integrated to the law.

Some "EVIDENCE" exists before the Board of early but crude systems – one company who "makes" such a product of which even obtained a waiver to VC 27156(c) - though unlawful – because it is an "open loop system"; and hence one that lets VC 27156(c) actually be defeated, as issued to HydroLectricPower LLC, for the HH2 Hydrogen Generator Device, as EXECUTIVE ORDER D-643 shows this as proof. These "back yard" ill-informed "manufacturers" are dangerous sorts.

We make a true Clean Air Act compliant closed loop lawful system that does this. Currently engine certification requirements make production marketing of such a system impractical because of the individual cases of engine type cert costs as currently done. A more practical approach is certification "on the fly of closed loop systems" based on performance – which will be different for many engines. We are not a large business, our effort is to comply with law.

Companies entering this field of business can be tied to, and held liable for tuning and compliance and then securing the emissions system from customer tampering just like today's OEM systems are from for example large automakers.

Two conditions for qualification for such a Hydrogen fueling system could be low pressure tankless (safety issue) fueling and original fuelstock being a waste source such as waste waters or et cetera. That way there are no impacts on the fresh water (drinking – potable) water supply in Hydrogen production. It could also be in part recaptured waste or actually sewage water as well. Industry incentive is needed. Most fuel injection systems will not need over 100 PSI

The emissions from burning this form of on the fly created Hydrogen will decrease Greenhouse gas emissions as harmless steam would escape to the atmosphere at best, and would create a new and HUGE industry that California could lead the Nation and perhaps the World in. Properly regulated Hydrogen generator production and system installations –much like auto emissions testing, and even importing – as in DOT limitations, could assure jobs stay in California and at least in the United States. Visit <http://www.hydrogenpowercentral.com> for more detailed info.

Lastly and most importantly, "BOOTLEG" sellers – largely on the Internet -need to be attacked and shut down. Sites like <http://ewsews.com/cngprices.html> which promote and sell Non-EPA or CARB approved systems, dangerous to install, violate VC 27156(c) – and INTEND to do so should be gone after under CCP 415.40 if their ad appears on or through a California internet server – be it mail or web. This "BOOTLEG" industry is bad be it on eBay or wherever. Halt it.

Sincerely
Reginald P. Burgess CEO
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