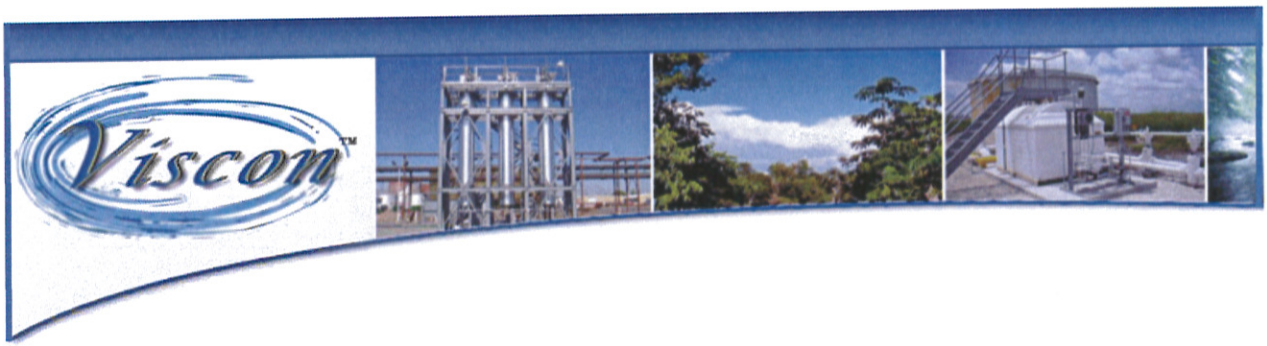

Border Crossings

In review of CARBS web post on the issue of excess Particulate Matter in the Imperial Valley Air District a readily available and CARB verified technology does exist. The Office of Environmental Health Hazard Assessment cited that "The use of Viscon diesel fuel may reduce morbidity and mortality due to pulmonary diseases, including lung cancer in adults and allergic asthma in children, caused by substances and particles contained in diesel exhaust."

The completion of CARBS Multimedia requirement after years of testing and four years of review at a cost of millions of dollars is evidence of our commitment to a cleaner environment with a safe and easy to implement product. The U.S. EPA has approved Viscon in the TxLed program in Texas for emission reductions. Adding Viscon as a contingency measure should not be a Herculean effort.

Cross – Border Impacts of Particulate Matter could be greatly reduced due to significant Particulate Matter reductions during idling. The long lines and lengthy waits of trucks crossing can be visibly observed to evidence huge amounts of Particulate Matter. Testing in the idle mode has shown as much as 63% reductions (See TDS #1113).

The cost of implementing the use of Viscon would have no negative effect on budgets. Tests performed at CARBS own lab in Stockton California by CARB employees can verify this claim. The savings in fuel consumption more than cover the cost of Viscon.

There is no reason not to attempt to utilize this approach to Particulate Matter reduction on both sides of the border. I would greatly appreciate the opportunity to discuss this before December 13th if needed.

Respectfully,

Michael J. Porter

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Cleaning Tomorrow's Air Today

VISCON **Technical Data Sheet #1113**

Emissions Reduction From Diesel Engine at Idle

Olson Ecologic testing laboratories of Fullerton, California conducted a series of emissions related tests in an off-road Caterpillar engine with and without Viscon treatment of the fuel. One element of the test series was a comparison of PM and NOx emissions at idle. The test program was carried out using a California Air Resources Board test protocol which includes EPA's Steady State Test cycle. The average of nine data points is given below.

Grams per Hour

	NOx	PM
Diesel	157.533	25.764
Diesel + Viscon	141.022	9.542
% Difference	-10.5%	-63%

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