

POSITION: NEUTRAL

Truck and Bus 08-11-3 Mathew Cohen

Over the past decade the fuel additive industry has offered up products to ARB to consider for diesel emission reductions. We lost out to natural gas first, then to biodiesel, now to VDECS. ARB determined that VDECS technology was superior to fuel additives in reducing emissions. Still, our industry has kept California's fleets, even the biodiesel ones, moving.

In August 2008, ARB sent out Advisory #379, which states that aftermarket fuel additives that make performance claims are prohibited, or, they can ask (Pay?) a VDEC manufacturer to list them on the VDEC verification application and be subjected to the EO's approval. The TDS is the foundation of this regulation.

The Advisory states that additives "may" adversely affect VDECS. There is no such reference in the TSD. Is there support or research documents ARB has compiled that have not been made public addressing which types of additives may damage VDECS? There are over 6,000 legally registered additives in the US, and hundreds of major brands that prevent fuel failures from water, rust, biological growth, oxidation, formation of corrosive peroxides and acids, that without these additives, fleets (and VDECS) will fail periodically, including first responders and emergency vehicles.

The TSD does not state how or which fuel additives are damaging. It does state that some additives can reduce PM by up to 50%. That would reduce maintenance on VDECS, not harm them. TSD states that fuel additives and engine oil contribute to ash, yet, it says that most ash comes from engine oil additive packages.

1. 2006 World Fuel Charter, of which all OEMs are signatory too, ban additives that form ash,
2. EPA also prohibits fuel additives that contain metals or inorganics that leave ash
3. Both California and the EPA already have laws that prohibit additives that can damage engines, emissions control devices, or raise emissions, so this regulation is redundant.

Why are aftermarket additives that make claims to reduce emissions banned, unless our former competing technology, VDECS manufacturers, say it's okay? Why are other additives, such as biocides, which contain toxic chemicals to kill fuel born microbes, allowed simply because they don't improve emissions?

The ARB could easily put in an additive registration program that expands over the EPA registration program which would consider the elemental composition, chemical class, and function, to accept an additive for use, rather than let the VDECS industry decide who gets to play. ARB still maintains the authority to ban any additive that causes damage or raises emissions with existing law, should any evidence of that arise. It can also use the Health and Safety Code to eliminate additives that make claims they can't support. Then the additive industry can continue to protect billions of dollars of equipment from fuel failures, as it has done for years.

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