

2004
19 May 2004

Mr. Richard Skaggs
Inspection and Maintenance Review Committee
400 R Street, Suite 1080
Sacramento, CA 95814

Dear Richard,

It was a pleasure meeting with you on Monday, 17 May, for the IMRC meeting, and our meetings with Jim Miwa, Commerce and Trade, and the staff of Assemblyman Ray Haynes. My concern addressed herein is specifically with our conversations with Mr. Tom Cackette of the Air Resources Board during the break of the IMRC meeting.

In regard to the "Evaluation of Omstar additive D-1280X" as posted on the website of the California Air Resources Board, Mr. Cackette's immediate response to your concerns as to the validity of the results provided under a test protocol questioned by peer review was an emphatic "You prove it!" I had followed with a short discussion with Mr. Cackette on my concerns with the validity of the protocol given the stated concerns of their own independent analysis, and the "insignificance" of the particulate reductions considering that Omstar's results during the same time period in fleet testing averaged a 52% reduction in opacity, and that a case could be made for drawing a correlation in using opacity as a surrogate measure of particulate reduction given the scale of these fleet tests, and like engine configurations. He had stated that he did not remember that ARB had tested for PM. I clarified this to be the case, and had stated that last year I had tested Omstar D-1280x with Pemex on mono-cylinder diesels and that PM had been reduced by 62%. I drew from this data my expectation that the ARB tests would have yielded much more than "insignificant" results. On my request to him of a follow up, Mr. Cackette was kind enough to send me an email the following day, to state that they did measure PM emissions, and concluded that "We stand by the data and analysis, and have nothing more to add on the subject."

The mission of Omstar Environmental Products, of Wilmington, California, has always been to offer a clean, economical, and easily implemented solution for emissions reduction in both Diesel and gasoline applications. The findings of the ARB have and continue to serve as the ultimate impediment to any success for a California company that is offering their product to California.

Something more meaningful than a retraction of the posted ARB findings would be in order. A retest by the ARB would be an appropriate approach. The outcome of this approach could then offer a California product to Californians as a real alternative solution that delivers economical emissions reduction. Additionally, the increased fuel efficiencies alone stand to offer an economical solution in greenhouse gas emissions. As it presently stands, Omstar continues to be prohibited from effectively marketing their product on a level playing field, in all markets both nationally and internationally given the great prestige and influence of the Air Resources Board and their findings.

Once again, California is now testing with another product: Lubrizol's PuriNOx, a product about which serious questions have been tabled by the scientific community as to the potential damage to California's aquatic life, and even likening the potential situation to that of MTBE. Fleet tests with PuriNOx are presently underway in California even while the scientists are requesting more comprehensive health effects studies. The additional situation of elevated air toxics being introduced does not appear to be an issue with this product. Following on MTBE, one could question why California would even be considering testing such a product at this time.

We do plan "to prove it", but with PM diesel reductions, along with significant NOx reductions in gasoline applications, and significant greenhouse gas emissions on both applications by delivering a seven to twelve percent reduction in specific fuel consumption, with the support of the ARB. We have nothing "to prove" with the past methodologies utilized to produce "insignificant" results. It is self evident, and does not lead to any solution. I am encouraged that a reasonable solution is possible. I understand that Omstar is seeking a solution whereby the past is the past, and seeks a proactive approach with the ARB where we could demonstrate the PM reductions under a new protocol, and would also seek to enlist the support from the ARB to deliver a demonstration of NOx reductions on gasoline applications, particularly addressing the 5.4 million vehicles that are posing the highest risk in maintenance reliability and is the targeted 27.4 tons per day in emissions reductions addressed by Mr. Tom Cackette at the February meeting of the IMRC. (please reference my letter to you of 01 March 2004).

Thank you for your valued time in assessing this matter, and wishing you and the IMRC the best in your continued success and great effort.

Sincerely,

Curtis Wolfe
Chief Engineer

In strategic alliance with Omstar Environmental Products, Wilmington, California, to provide global emissions reduction solutions.