



## OMSTAR ENVIRONMENTAL PRODUCTS

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Dr Ralph G. Appy, Ph.D.  
Director of Environmental Management  
Port of Los Angeles  
425 S. Palos Verdes Street  
San Pedro, CA 90731

January 19, 2005

**RE: "No Net Increase"**

Dear Dr. Appy,

It was a pleasure to meet with you and Commissioner James Acevedo last week. Thank you for making time to speak with me.

D-1280X, Inc. is a small business California Corporation located in **Wilmington, CA** since 1986. D-1280X is the Trade Mark name of our fuel reformulator which is an exclusive blend of synthetic esters registered with the US EPA and in use since 1988. Certified laboratory tests reveal D-1280X to be **99.977% free from** toxins and **proven** to reduce **harmful** emissions up to **89%**, with an increase in fuel economy with no toxic offsets as those found in **Lubrizol's PuriNOx**.

D-1280X **has** been tested over **and over again** – always reducing harmful emissions in diesel, bunker and gasoline fuels. The City of Los Angeles Department of Airports tested and **used** D-1280X fuel reformulator in their diesel shuttle buses, monitored by Hudson General Aviation Services, Inc. for more than 8 years and millions of **cumulative** miles until CNG, LP, Electric, Methanol and MTBE became the California Air Resources Board's (CARB) **recommended** choice for alternate fuels use. Currently CARB is promoting Lubrizol's PuriNOx as **an alternate** fuel even **though** CARB is aware **that** PuriNOx emits unregulated carcinogenic and mutagenic emission offsets into our environment, (1-21-04 EPA Office of Environmental Health Hazard Assessment Report date attached.)

As a native San Pedro resident I have witnessed the rapid growth of business in the Port with a visible increase of diesel emissions in **the** environment from ships, **tug** boats, **trucks**, **locomotives**, and dock equipment. **When** a **Cruise** ship enters the Port it's like a small floating **city with** its own power plant. I am aware of Mayor Hahn's **directive** of "No Net Increase in Pollution" in **the** Port which **seems** unattainable under the conditions and circumstances of continued Port growth.

A suggestion to assist the Port **Administration** to work **towards** attaining the "No Net Increase" goal would be to authorize the Port Police and Harbor **Patrol** to cite any diesel operator **suspected** of producing excessive black diesel smoke. The suspected violator could be directed to **CalTest Instruments, Inc.**, (a sister company of D-1280X) or any certified diesel smoke testing company for an official smoke opacity test with a printed report to **verify** a pass or fail **status** using a similar protocol as CARB's Regulation for California's Heavy-Duty Diesel Inspection Program. In the case of suspected violations from stationary equipment or **from** a **vessel** on the waterway in or near Los Angeles Harbor, **if requested**, **CalTest** would go to the site of the **suspected** violation **and measure** the smoke opacity **and provide** an immediate **printed** report showing **the percent** of smoke **opacity** measured from the suspect **equipment**.

## Table of Contents

1. Jan. 21, 2004, EPA Office of Environmental Health Hazard Assessment of PuriNox Generation I & 2.
2. Frequently Asked Questions **about Omstar D-1280X.**
3. Omstar **D-1280X: A Problem Solver for Right Now-**
4. May 6, 1988 Correspondence **from former** Councilman Richard **Alatorre** to former L.A. City Mayor Tom Bradley asking the **City** to supply diesel **trucks** to the ARB for testing **D-1280X.**
5. June 9, 1988 letter **from** Mayor Tom Bradley requesting Maria Hummer, President **L.A. Airport Commission** give Hudson General permission to begin using **D-1280X** in the LAX Shuttle **buses** as **soon as possible.**
6. **July 4, 1988,** American President Lines receives commendation for pollution reduction using **D-1280X.**
7. July 25, 1988 Letter from Brad Sales, Deputy Air Quality reporting laboratory results indicate there is nothing the **D-1280X** that would be **detrimental** to **the** equipment.
8. Sept. 9, 1988 letter **from** Mayor **Bradley** to **Clifton Moore, Executive Director L.A. Dept. of Airports.**
9. Sept. 9, 1988, letter **from** Mayor Bradley to **Gordana Swanson, President Board of Directors, Southern California Rapid Transit District** asking the RTD to **begin** a **D-1280X** testing program of its own.
10. **July 30, 1988, letter from** CEE Testing **Laboratory** to Fred Shepherd, **Equipment Maintenance Manager** for APL Oakland, reporting smoke opacity **reductions** after using **D-1280X** in Ottawa Trailer Jockeys and Generator Sets.
11. **August 23, 1988, letter from** CEE Testing **Laboratory** to **Bob Alexander, Vice President AFL, Oakland** reporting **overall** emission reductions of **50.3% in** Trailer Jockey Tractors with Detroit Diesel 453 and **Catapillar 3208 engines and Generator Sets at APL's Seattle, Washington terminal.**
12. July 26, 1989, Final **Report** on results of **opacity testing and** engine temperature conducted on **the vessel, Condor, using D-1280X, from** CEE Testing **Laboratory** to **Lillian Kawasaki, Director of Environmental Management, Harbor Dept, Port of L.A.** Opacity reduction -74%, engine temp. -46%.
13. **January; 3, 1990, CEE Testing Laboratory report** to Joseph Clair, Manager Landside Operations, L.A. City Dept. of Airports -18 month LAX Shuttle Bus **Test Study** on **the** Effects of Omstar **D-1280X fuel reformulator** used in 30 **shuttle buses** with 11 **"heavy Smokers."** **Test period** June 1988 – December 1989 reported a 90% opacity reduction.
14. **July 9, 1990, City of Los Angeles, Harbor Dept. Office Memorandum re: Omstar Fuel Additive.**
15. November 2, 1992, CEE Testing **Laboratory study of the City of L.A. Dept. of Airports,** 4 year -3 million mile use of **D-1280X** on LAX Shuttle bus **exhaust smoke** opacity **from June 1988 – August 1992.**
16. September 5, 1996, letter from Hudson **General Maintenance Manager** Walter Schwarz to Richard Skaggs Omstar President reporting that **after 8 years and 8 million cumulative miles using D-1280X in the LAX Shuttle Bus Fleet,** a routine **engine inspection that included a complete engine disassembling** revealed an **unusual** sub-normal wear **pattern** in the upper cylinder walls, **valve stems and upper firing rings.**
17. September 23, 1988, **letter from Tom Stolnack, General Manager for Hudson Aviation Service** to Councilman Richard **Alatorre** , stating based on the **favorable** results **using D-1280X in the LAX Shuttle buses** they planned to **continue and** expand the use of **D-1280X to their Canadian operation** and at **JFK International Airport in New York.**
18. June 1, 1989, CEE Testing **Laboratory Forecast of Annual Emission Reductions from the LAX Shuttle Buses** based on **the 30 buses tested using D-1280X – to Tom Stolnack Hudson Services General Manager. .**

CalTest Instruments, Inc., manufactures SAE J1667 specification digital diesel smoke opacity meters used by State, County and Private Fleet operators, and Federal, Military, and Regulatory Agencies nation-wide and in countries outside the United States. CalTest engineers are members of the SAE 51667 Committee team that worked for 6 years to developed SAE J1667 smoke opacity meter specifications and test procedures. The CalTest Model 1000 proved to be the most consistent and accurate meter of **all** the meters tested in the SAE 51667 - ARB Accuracy and Correlation Test conducted in 1996, between all meter manufacturers world-wide, *(copy attached)* CalTest Instruments, Inc. is available at your request to measure diesel smoke opacity emissions from diesel buses, trucks, ships, tug boats, locomotives, boilers and any type of stationary, mobile land or off-road equipment.

D-1280-X, Inc, dba Omstar Environmental Products would like the D-1280X fuel reformulator product to be included as an alternate fuel in the Port's environmental projects and in the challenge to meet Mayor Hahn's directive of "No Net Increase in Pollution." **D-1280X is cost-effective, and has been proven over and over again to be an environmentally safe alternative fuel that reduces harmful toxic emissions from diesel, bunker and gasoline fuels without the danger of adding un-regulated carcinogenic unknown mutagenic toxic offsets into our environment as those toxics found in PuriNox. See the January 21, 2004. EPA Environmental Health Hazard Assessment Report. *(copy attached)*** Many concerned citizens question why CARB continues to support the entrance of PuriNox into our community and into the world marketplace - seeming to blatantly ignore the toxic findings in the US Environmental Health Hazard Report.

A Table of Contents **attached**, lists documents for your review. **No. 1 is the EPA Office of Environmental Health Hazard Assessment of PuriNox, then D-1280X Q & A, 1988 -1989** correspondence from our **former** Mayor Tom Bradley recommending the use of D-1280X in all city vehicles after the City laboratory studies proved D-1280X to be non-toxic to the environment and could be **used** without harm to City equipment. Certified test results from the Harbor Department's test of D-1280X in the Vessel-Condor in 1989, the LAX 18 Month and 4 Year - 3 Million Mile LAX Shuttle **Bus** Test Reports, a Costa Rica 3 year test using bunker fuel reformulated with D-1280X in boilers, and other certified tests performed by California **State** accredited laboratories are included for your review.

Please call me at 310-835-6909 if you have any **questions** about the documents provided. I look forward to your reply.

Sincerely,



Roberta Landon Skaggs

D-1280X, Inc. / CalTest Instruments, Inc.

WBE/DBA Certified

cc: Governor **Schwarzenegger**  
City of Los Angeles Mayor Hahn  
Commissioner James Acevedo