



Air Resources Board

Mary D. Nichols, Chairman

1001 I Street • P.O. Box 2815

Sacramento, California 95812 • www.arb.ca.gov



Matthew Rodriguez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

April 7, 2014

Mr. Michael J. Porter, President
Viscon California, LLC
3121 Standard Street
Bakersfield, California 93308

Dear Mr. Porter:

Thank you for your letter requesting further clarification of Executive Order DE-11-007 issued on October 19, 2011.

I once again congratulate you on successfully completing the Air Resources Board (ARB) verification program for diesel emission control strategies (Verification Program). The Verification Program includes a thorough and comprehensive technical evaluation. Your diligent efforts resulted in approval for Viscon fuel additive as a verified Level 1 diesel emission control strategy (DECS) under the Verification Program, for use in off-road, heavy-duty, model year 1985 to 1995 compression-ignition engines in California.

In your letter, you requested further clarification of the scope of your Executive Order for Viscon, under the Verification Program. Your letter mentioned that sales in Texas and Chile could appear to be in violation and voiced your concern that the Executive Order may hinder these sales outside of California. Please be assured that the limitations cited in the Executive Order apply to usage in California and applicability to California's in-use fleet regulations. In general, an Executive Order specifies the legal requirements for each verified DECS under the *Regulation for the Verification Procedure for In-Use Strategies to Control Emissions from Diesel Engines* (title 13, California Code of Regulations, sections 2700-2711). Once an Executive Order is issued, the verified DECS becomes an additional compliance option for regulated parties subject to ARB fleet regulations.

Therefore, the verification requirements, terms, and conditions specified in Executive Order DE-11-007 apply only to Viscon use as a Level 1 verified DECS in compliance with ARB fleet regulations in California. All other sales of Viscon outside of California would not be subject to Executive Order DE-11-007.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

Mr. Michael J. Porter, President
April 7, 2017
Page 2

We hope this letter has addressed all of your concerns and we wish you success in marketing your additive product.

If you have any additional questions, please contact me at (916) 322-6312 or escheehl@arb.ca.gov, or Ms. Aubrey Gonzalez, Air Resources Engineer, Substance Evaluation Section at (916) 324-3334 or agonzale@arb.ca.gov.

Sincerely,



Elizabeth Scheehle, Chief
Alternative Fuels Branch

cc: Aubrey Gonzalez
Air Resources Engineer
Substance Evaluation Section