

July 28, 2011

Secretary Linda S. Adams, Chair
Environmental Policy Council
1001 I Street PO Box 2815
Sacramento, CA 95812

RE: Comments For August 15, 2011 CEPC Hearing

Viscon may or may not have a significant adverse impact on public health. The carcinogenic chemical 1,3 butadiene was reported as "essentially eliminated" in a SAE paper authored by Donel Olson of Olson-Ecological Laboratories, using Viscon. (SAE 2007-01-3981). However, in the ARB Verification Application tests, Mr. Olson's data using the same Caterpillar 3306 engine shows a 1,640% increase in 1,3, butadiene. NOx was also reduced in the 2007 SAE test report, from 20% to 25%, but the Staff Report's data shows NOx up 2.9%. These 180 degree opposite test results in the same engine by the same laboratory cast some doubt over the accuracy of all the exhaust data. Perhaps another independent laboratory should conduct the identical emissions and toxins tests to verify reproducibility and repeatability of Mr. Olson's sampling and testing protocols, as is done during the ASTM's round robin lab test phase during Test Standards development.

Matt Cohen