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March 8, 2000



Ms. Joann Lee Freeborn Kansas House Republican District 107 Chairman, House Environment Committee

Dear Ms. Freeborn:

This letter is to express support for Kansas House Concurrent Resolution No. 5069 which encourages the use of biodiesel in low blend levels in the State of Kansas.

As an introduction, I am Quality Systems Manager at Stanadyne Automotive Corp., the leading independent U.S. manufacturer of diesel fuel injection equipment. Also, I serve as chairman of the Society of Automotive Engineers (SAE) diesel fuel injection equipment standards committee and chairman of the International Organization for Standardization (ISO) working group on diesel fuel lubricity. In supporting the above mentioned resolution, I am speaking not only for Stanadyne, but for the entire worldwide diesel fuel injection equipment community.

All diesel fuel injection equipment has some reliance on diesel fuel as a lubricant. Wear due to excessive friction resulting in shortened life of diesel injection pumps and injectors, has sometimes been ascribed to lack of lubricity in the fuel. For many years, the lubricity of the diesel fuel was sufficient to provide the protection needed to maintain adequate performance. Recent changes in the composition of diesel fuel, primarily the need to reduce the sulfur level, have inadvertently caused the removal of some of the compounds that provide lubricity to the fuel. This has, in turn, given rise to concerns that today's diesel fuels do not have sufficient lubricity to protect certain fuel injection equipment. There have been numerous examples from the field where lack of lubricity in the fuel has caused premature equipment breakdown and in some cases, catastrophic failures. This problem will be more dramatic as EPA moves to further reduce the sulfur levels in petrodiesel fuel.

Through cooperation with the National Biodiesel Board, we have tested biodiesel at Stanadyne and results indicate that the inclusion of 2% biodiesel into any conventional diesel fuel will be sufficient to address the lubricity concerns that we have with these existing diesel fuels. From our standpoint, inclusion of 2% biodiesel is desirable for two reasons. First, it would eliminate the inherent variability associated with the use of other additives and whether sufficient additive was used to make the fuel fully lubricious. Second, we consider biodiesel a fuel or a fuel component--not an additive. It is possible to burn pure biodiesel in conventional diesel engines. Thus, if more biodiesel is added than required to increase lubricity, there will not be the adverse consequences that might be seen if other lubricity additives are dosed at too high a level.

For the reasons above, we fully support and encourage the adoption of House Concurrent Resolution No. 5069.

Sincerely,

P.T. Hender

Paul Henderson Manager, Quality Management Systems

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