



# Franklin Fuelling Systems

Greg Roberts  
Carbontech Engineering  
1138 Big Pine Lane  
Norco, CA 92860

04/11/11

Dear Mr. Roberts,

Thank you for your request for a certification that our products, Philtite models 500-FS-NPR-GRY and 501-FS-NPR-GRY containing 85000-1 & 85001-1, are compatible with biodiesel blends up to B20. We have considered your request, and based upon the facts presented in your request and our own independent review of the product, any applicable regulations or guidelines, and our general knowledge of the applicable technology and chemistry, we are aware of no reason why these Philtite/EBW products should not be used with B20 biofuel.

According to the fourth edition (revised December 2009) of the NREL/TP-540-43672, Biodiesel Handling and Use Guide, "dispensing equipment does not need to be modified for blends of 20% biodiesel or lower, unless there is an issue with specific elastomers that are not compatible with B20." For these assemblies, none of the seals are of a composition listed as not recommended by NREL for use with up to B20. Most of seals used in the fuel path are either fluorocarbon seals which are acceptable for compatibility with biodiesel per this NREL document. The remaining seals that are not fluorocarbon or mentioned for biodiesel compatibility in the NREL document have been specifically tested for biodiesel service by their suppliers and in one case our own in-house verification testing. This information and testing suggests chemical compatibility for biodiesel blends up to B20.

However, we are unable to make an unqualified, affirmative statement that these products are compatible with B20 biofuel based solely on these references. We anticipate pursuing certification for these products with B20 as UL and other certification agencies develop means for certification testing. In addition, nothing said herein shall be construed as a warranty with respect to the performance of the listed products, or be construed as a modification of existing warranties, or as an addition of new warranties beyond the warranties specifically applicable to these Philtite/EBW products or which accompanied the shipment.

As always, we appreciate your business and look forward to continuing our relationship.

Best Regards,

Lorraine Sabo,  
Engineering Manager