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From:

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Sent from the Internet ([Details](#))

ITG INNOVATIVE TECHNOLOGY GROUP

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Mr. Rick Weston,

Thank you for this opportunity to make comments regarding the Working Group and RAP document.

We would suggest that statements be included which allow cost effective aftermarket products like ours, to compete with manufacturer's new engines. There are thousands of existing diesel standby generators which can be retrofitted to lower emissions and to operate at prime power ratings. Manufacturers want to sell new 'iron' so care should be taken to not set all standards to their exclusive specifications. Hopefully emission levels

can be established slightly above manufacturer's claims. This will promote more competition and allow older, existing engines to participate.

The ITG natural gas/diesel dual fuel technology achieves up to 70% reductions in emissions on older diesel engines. Additional reductions can be achieved by combining dual fuel with other alternative fuel technologies. The ITG system was CARB certified in 1993 and has engines presently operating in the USA and elsewhere. Applications include all type of vehicles and generators of all sizes.

The ITG web site at www.innotechgroup.com gives a good overview and brochures can be provided for further details.

Respectfully,

Larry Reinhart

ITG Sales Manager

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