CODE BULLETIN C-42

American Chemistry Council
Product Approval Code of Practice
December 2010 Edition

To: **Practitioners of the American Chemistry Council Product Approval Code of Practice and Interested Parties**

Original Issue date: **April 13, 2011**

Effective Date: **May 11, 2011**

Re: **Inclusion of Information Request to Tab 4 of the Product Approval Code of Practice – December 2010 Edition**

The American Chemistry Council's (ACC) Product Approval Code of Practice (Code) includes information requests and responses in Tab 4 of the Code. Information requests and responses are generally not released to Code Practitioners on an interim basis, but are incorporated at the time the Code is revised and a new version released. Given the scope of a recent request regarding Appendices H, the Product Approval Protocol Task Group (PAPTG) reached consensus to release the information request and PAPTG's responses in advance of the release of the next edition of the Code. This information request and PAPTG responses will also be included in Tab 4 of the next edition of the Code.

The Code is available online at http://www.americanchemistry.com/paptg. Comments to this Code Bulletin (C-42) should be sent to the PAPTG Manager, W.D. (Doug) Anderson prior to May 9, 2011.

March 25, 2011

Mr. Richard P. Leach
Global Industry Advocacy Advisor
ExxonMobil Lubricants & Specialties
3225 Gallows Road
Fairfax, VA 22037

Dear Richard,

The American Chemistry Council's Product Approval Protocol Task Group (ACC PAPTG) has reviewed your letter dated February 9, 2011, which requested clarification on several points related to minor formulation modifications described in Appendix H of the ACC Code of Practice. ACC PAPTG's responses to the three questions asked in your letter, which is included with this letter, are provided below.

(1) Is there an element of time / sequencing associated with the use of minor formulation modifications during the development of a program?

There is no time / sequencing associated with the use of minor formulation modifications during the development of a program. The Modification part of the Formulation/Stand Code (described in ACC Code, Appendix B) is intended to differentiate minor modification of a formulation used in a core program. In the Formulation/Stand Code, the combination of ID, Sponsor Code, and Modification identifies a unique blend formula. The Modification (letter) designation of the Formulation/Stand Code is independent of time/sequencing. The underlying guidance is that the DI/VM chemistry for all test formulations must be able to reach the final formulation in a Core Program using the guidelines of Appendix H and that the final formulation contains all minor formulation modifications used during the conduct of the engine test program. Additionally, if the core program is a matrix core program, then API 1509 Appendix E (Base Oil Interchange Guidelines) and/or API 1509 Viscosity Grade Read Across Guidelines (Appendix F) are also followed.

(2) If there are no time related limitations, is it permissible to create and test minor formulation modifications containing lower levels of additive than oils that have previously passed other engine tests? For example, is it acceptable to make a Level 1 reduction in the antioxidant concentration of a formulation that passed the Sequence IIIG, then run the resulting formulation with the lower additive level in one of the other Sequence tests?

Since there are no time related limitations, it is permissible to create an alternate formulation for the program at any time as long as the performance additive package commercialized for sale includes all minor modifications used to support the final formulation. Please note, the Code does not contain the term "level 1 reduction".

(3) If it is permissible to create and test minor formulation modifications containing lower levels of additive than oils that have previously passed other engine tests, is it intended that any formulation created via a reduction in additive levels during a program be less robust than previous formulations in the completed and remaining engine tests? In other words, additive reductions during a program are intended to create a more severe testing scenario compared to the final formulation, correct?

It would be difficult to determine the intent of formulation changes; however, the expectation is the final formulation will pass all engine tests. It is the intent that minor modifications will not deteriorate performance in the final formulation.

Please do not hesitate to contact me if you have any questions with the responses provided by ACC PAPTG. Thank you.

Regards,

W.D. Anderson

W.D. Anderson
Petroleum Additives Panel Manager

ExxonMobil Lubricants &
Petroleum Specialties Company
3225 Gallows Road
Fairfax, VA 22037

February 9, 2011

Mr. Doug Anderson
Petroleum Additives Panel Manager
American Chemistry Council
700 2nd Street, NE
Washington, DC 20002

Dear Mr. Anderson:

This letter is to request clarification on several points related to the application of the minor formulation modifications described in Appendix H of the Code of Practice. Although it is clear that all minor modifications must be included in the final formulation, and data supporting technical integrity of the modifications used during a program is required, clarification on interpreting timing and relative composition requirements for formulations with minor modifications is being requested.

(1) Is there an element of time / sequencing associated with the use of minor formulation modifications during a development program?

(2) If there are no time related limitations, is it permissible to create and test minor formulation modifications containing lower levels of additive than oils that have previously passed other engine tests? For example, is it acceptable to make a Level 1 reduction in the antioxidant concentration of a formulation that passed the Sequence IIIG, then run the resulting formulation with the lower additive level in one of the other Sequence tests?

(3) If it is permissible to create and test minor formulation modifications containing lower levels of additive than oils that have previously passed other engine tests, is it intended that any formulation created via a reduction in additive levels during a program be less robust than previous formulations in the completed and remaining engine tests? In other words, additive reductions during a program are intended to create a more severe testing scenario compared to the final formulation, correct?

I look forward to your answers to the above questions and appreciate your help with the interpretation of the ACC Code of Practice.

Sincerely,

Richard P. Leach
Global Industry Advocacy Advisor