



**PETROLEUM
MARKETERS
ASSOCIATION OF
AMERICA**

March 25, 2016

Coordinating Research Council
Diesel Performance Group
5755 North Point Parkway
Suite 265
Alpharetta, GA 30022

RE: PMAA ULSD Corrosion Task Force Comments – Preventative Maintenance Guide for Diesel Storage and Dispensing Systems.

The PMAA ULSD Corrosion Task Force would like to thank the CRC for the opportunity to comment on the draft *Preventative Maintenance Guidance for Diesel Storage and Dispensing Systems*. The Task Force agrees that the guidelines contain good tank management practices that all tank owners should follow to minimize diesel fuel contamination, maximize fuel system cleanliness and reduce the risk of ULSD corrosion downstream.

However, in order for the guideline to be effective at ensuring diesel fuel cleanliness throughout the petroleum distribution system, the same best management practices must be required for infrastructure above the terminal rack. Such practices should include a 1 inch water standard for terminal and refinery ASTs along with a requirement for 30 micron filters for product moving from the terminal tank to the rack, or in the alternative, for product moving between the rack and cargo tank trucks pulling product. Members of the Task Force have all experienced problems with diesel fuel quality coming over the terminal rack.

Members of the Task Force are concerned that recent studies by the EPA and other groups have not adequately addressed diesel fuel quality issues above the terminal rack. The presence of water and sediment in pipelines; marine vessels and terminal storage tanks; the lack of adequate filtration systems to remove impurities from product moving over the rack; and diminishing levels of corrosion additive as product moves through the distribution system all have an impact on diesel fuel quality and ULSD corrosion occurring downstream. The Task Force recommends that above the rack diesel fuel quality issues be thoroughly vetted before drawing any general conclusions on the source of diesel fuel contamination. Diesel fuel cleanliness should be the responsibility of all parties along the distribution chain to ensure maximum environmental benefits and engine performance.

The PMAA ULSD Corrosion Task Force thanks you for the opportunity to comment on this important issue. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Underwood', written over a white background.

Rob Underwood
PMAA President