



**PETROLEUM
MARKETERS
ASSOCIATION OF
AMERICA**

1001 N. FORT MYER DRIVE • SUITE 500 • ARLINGTON, VA 22209-1604 • 703-351-8000 • FAX 703-351-0160

The Honorable Bill Shuster
Chairman
Transportation and Infrastructure Committee
US House of Representatives
Washington, DC 20015

The Honorable Peter DeFazio
Ranking Member
Transportation and Infrastructure Committee
US House of Representatives
Washington, DC 20015

The Honorable Sam Graves
Chairman
Highways and Transit Subcommittee
US House of Representatives
Washington, DC 20015

The Honorable Eleanor Holmes Norton
Ranking Member
Highways and Transit Subcommittee
US House of Representatives
Washington, DC 20015

The Honorable Jeff Denham
Chairman
Railroads, Pipelines, and Hazardous Materials
Subcommittee
US House of Representatives
Washington, DC 20015

The Honorable Michael Capuano
Ranking Member
Railroads, Pipelines, and Hazardous Materials
Subcommittee
US House of Representatives
Washington, DC 20015

Dear Chairman Shuster and Ranking Member DeFazio:

On behalf of the Petroleum Marketers Association of America (PMAA), a federation of 47 state and regional trade associations representing approximately 8,000 independent petroleum marketers nationwide, I am pleased to support Section 7005 in the "Surface Transportation Reauthorization and Reform Act of 2015" that withdraws the Pipeline and Hazardous Materials Safety Administration's (PHMSA) "wetlines" proposed rule pending since January 27, 2011.

PMAA member companies own 96 percent of all retail gasoline stations operating in the United States. PMAA members are engaged in the transport, storage and sale of petroleum products including gasoline, diesel fuels, kerosene, jet fuel, aviation gasoline, propane, racing fuel, lubricating oils, and home heating oil at both the wholesale and retail level. PMAA members are the primary conduit for bringing petroleum products from the terminal rack to retail locations and represent a vital and indispensable link in the nation's petroleum distribution chain.

On January 27, 2011, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a rule regarding the transportation of gasoline in the external product piping "wetlines" on cargo tanks transporting flammable liquids. The rule was similar to a rule PHMSA proposed in 2004 and then withdrew in 2006 after determining the costs would exceed the benefits by 5 percent. The rule limited the amount of gasoline in each wetline to one liter. Transports usually have four wetlines – one per compartment. The rule gave tank truck operators 12 years to retrofit existing tanks with bottom protection like steel rails or install purging equipment, and any trailer manufactured two years after the date of regulation would have to be equipped with in line purging devices or steel guard rails to shield the wet lines from impact.

PMAA argued that the wetlines mandate would weaken our existing, very efficient, fuel transportation system. There are over 15,000 gasoline cargo tank trailers in the U.S. and less than 100 are equipped with purging equipment. Retrofitting existing transport trailers with bottom mounted steel guard rails to protect against impact is virtually impossible due to trailer design limitations. PMAA also argued that the rule would unfairly burden thousands of small businesses who cannot afford to retrofit trucks. The cost to retrofit a truck is as much as \$8,000. The annual cost to maintain the purging equipment is \$400 per unit. The cost to replace a transport trailer can run as high as \$100,000. Additionally, it could not be justified as sound public policy. Those who supported the wetlines retrofit mandate were understating costs and overstating benefits.

Again, we commend you for this bipartisan effort and support your hard work during the markup of this bill on October 22, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Underwood". The signature is fluid and cursive, with a large initial "R" and "U".

Rob Underwood
PMAA President