

TURNING TANKS OVER TO ULSD

In order to make certain storage tanks are in compliance with ULSD requirements, active management of diesel fuel inventories and deliveries is essential as the October 15th compliance deadline draws near. Manage tank turnover by using a mixture of three parts delivery volume of ULSD to one part existing tank inventory. A turnover can be achieved by making a minimum of five “three-to-one deliveries” into each tank.

Three to One Inventory Management

	STARTING INVENTORY		DELIVERY		ENDING INVENTORY	
	Gallons	Sulfur ppm	Gallons	Sulfur ppm	Gallons	Sulfur ppm
Delivery # 1	1000	500	3000	15	4000	136
Delivery # 2	1200	136	3800	15	4800	46
Delivery # 3	800	45	2400	15	3200	33
Delivery # 4	1050	23	3150	15	4200	17
Delivery # 5	700	17	2100	15	2800	15

Receive five three-to-one ULSD deliveries after September 1 and then change dispenser labels to ULSD 15-ppm.

If you want to label your dispensers with ULSD sooner, a more aggressive tank turnover is necessary.

Jobbers should not receive deliveries less than “three-to-one” because doing so will result in insufficient mixing of delivery and heel. Good mixing is required for proper tank turning.

Tanks turned in less than three deliveries will require testing for compliance.

You may want to test all tanks to determine if turnover has been achieved, regardless of the turnover formula used.

**GOT QUESTIONS? CONTACT MARK S. MORGAN ESQ. at (202) 364-6767 or
mmorganpsa@cox.net**