



July 11, 2019

Bill Striejewski  
Chairman  
Fuels and Lubricants Subcommittee  
National Conference on Weights and Measures  
Sent via email: [wstrijewski@agri.nv.gov](mailto:wstrijewski@agri.nv.gov)

**Subject: Proposed Modification to Definition of Premium Diesel**

Dear Mr. Striejewski:

The Fuel Additives Task Group<sup>1</sup> (FATG) of the American Chemistry Council would like to provide the following feedback ahead of the NCWM Annual Meeting on July 14-18, 2019. The FATG works on behalf of its members to address fuel additive performance issues, such as product specification and third-party standard setting.

The FATG has reviewed the *Letter of Support from Industry* included in the meeting materials for the NCWM Annual Meeting. The FATG supports the spirit of industry coordination demonstrated by the signatories to that letter: the American Petroleum Institute, the Petroleum Marketers Association of America, NATSO, CQA and TOP TIER, the Truck & Engine Manufacturers Association, and the Alliance of Automobile Manufacturers.

The FATG is in favor of performance standards, such as those contained in the revised NCWM Premium Diesel Definition, that allow fuel marketers to exceed minimum specification requirements. The addition of additives to diesel fuel allows fuel marketers to meet fuel specifications as well as provide fuels that offer enhanced performance to consumers.

FATG believes the suggested text of *2.2.2 Use of Other Diesel Terminology* as detailed in the *Letter of Support from Industry* provides important clarifications to the definition, as it allows fuel marketers the flexibility to use appropriate descriptive terms based on the functional benefit provided. FATG supports performance claims based on sound data derived from using industry standard tests.

The FATG would like to offer itself as a technical resource on additive issues to the NCWM in the future. If you have any questions about this letter please contact the ACC FATG manager, [Colleen Stevens](#).

Sincerely,

A handwritten signature in black ink that reads "Andrew McKnight".

Andrew McKnight  
FATG Chair  
Innospec Fuel Specialties

A handwritten signature in black ink that reads "Colleen Stevens".

Colleen Stevens  
FATG Manager  
American Chemistry Council

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<sup>1</sup> Members of the FATG include: Afton Chemical, BASF, Chevron Oronite, Infineum USA, Innospec Fuel Specialties, and The Lubrizol Corporation.

