

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

JUL 2 0 2007

OFFICE OF AIR AND RADIATION

Mr. Jeff Hove Regulatory Affairs Manager Petroleum Marketers and Convenience Stores of Iowa 1303 50th Street West Des Moines, IA 50266

Re: Approval of Alternate Product Transfer Document Wording and Correction to Previously Approved Language

Dear Mr. Hove,

This letter is to acknowledge that the Environmental Protection Agency (EPA) has reviewed and approved the alternate product transfer document wording that the Petroleum Marketers and Convenience Stores of Iowa (and the Petroleum Marketers Association of America) has requested for use.

For "High Sulfur Dyed Nonroad, Locomotive, or Marine Engine Diesel fuel—sulfur content may exceed 500 ppm sulfur. Not for use in highway vehicles or engines. Not for use in any nonroad engines requiring Ultra-Low Sulfur Diesel Fuel. Not for use in the Northeast/Mid-Atlantic Area.", per 40 CFR 80.590(a)(7)(v), either of the following alternative statements may be used on PTDs when product is transferred below the terminal (to retailers or wholesale purchaser-consumers) from June 1, 2007 through September 30, 2010:

- "High Sulfur Dyed Diesel. May Exceed 500 ppm Sulfur. Not for use in the NE/MA
  Area or in engines requiring ULSD. Nonroad, Locomotive, or Marine Use Only."

   OR
- "High Sulfur Dyed Diesel. May Exceed 500 ppm Sulfur. Not for use in: any highway engines, the NE/MA Area, or any engines requiring ULSD. NRLM Use Only."

Regarding the clarification requested for the alternate product transfer document language approved for use in place of the language at 40 CFR 80.590(a)(7)(iv) ("500 ppm sulfur (maximum) Dyed Low Sulfur Nonroad, Locomotive or Marine Diesel Fuel. Not for use in highway vehicles or engines except for use in Model Year 2006 and older highway diesel vehicles or engines for tax-exempt use in accordance with section 4082 of the Internal Revenue Code."), the following language may be used on PTDs when product is transferred below the terminal (to retailers or wholesale purchaser-consumers) from June

1, 2006 through September 30, 2010: "500 ppm sulfur Dyed LSD. Non-road or tax-exempt use only. Not for use in 2007 and later highway vehicles." (Note the addition of the word "highway" in the last sentence.)

If you should have any additional questions regarding this matter, please contact Ms. Tia Sutton at (734) 214-4018.

Sincerely,

David J. Kortum

Manager, Fuel Programs Support Group

cc: Mark S. Morgan, Petroleum Marketers Association of America