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John L. Conley
President
National Tank Truck Carriers Inc.
950 N. Glebe Rd. Suite 520
Arlington VA 22203-4183

Reference: Wet lines 2009

Dear John,

Civacon, part of the OPW Fluid Transfer Group, a market leading manufacturer of valves and fittings and electronic Overfill detection equipment for DOT 406 transports would like to offer our comments regarding a possible move to mandate the removal of flammable materials from cargo tank loading and unloading lines, i.e. the wet line issue.

Civacon has looked at this proposal several times in the past and our opinions have not changed in that we believe it will not offer any additional operational benefits to the industry and any increase in operational safety in an accident environment would be marginal at best.

We are concerned however regarding the overall cost to the industry in terms of cost of equipment and installation and possible recalibration of each compartment. We also have a safety concern if the mandate is made to retrofit to existing trailers due to a requirement for welding, grinding and drilling on each compartment and run-off line.

We also have environmental concerns as current technology will result in additional increases in VOC releases to the atmosphere.

Cost

Looking at available technology and future product developments we consider a cost per new trailer built would be in the region of \$4,000 to \$7,000. In a "typical" year this would increase the cost to the industry by \$7 to \$10 million in equipment costs alone.

If wet lines were mandated to retrofit to existing trailers we estimate a labor cost of approximately \$3,000 per trailer plus equipment cost of \$4,000 to \$7,000. This means a total cost to retrofit fleets of >\$168 million.



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Safety

We share the opinion of many people that performing this much additional welding on existing fleets of trailers would in itself be a significant safety concern across the country in all the R Stamp repair and maintenance facilities.

Additional concerns

- If the only solution available is to remove the product from the run-off line and introduce it to the compartment then operational changes will be needed to account for the additional liquid being put in to each compartment. Ulage's may need to be recalibrated and existing Overfill Sensors may need to be repositioned or replaced. It could mean a reduction in the carrying capacity of compartments in order to maintain the correct ulage.
- In the case of a "probe out" or overfill at the rack, when the compartment is now "over full," how will the product be removed from the run-off line and processed back to the terminal before the trailer can be moved? The product at this point has already gone past the terminal meter and "belongs" to the trailer.

Current technology

To our knowledge the only commercially available system to purge the wet line uses compressed air to displace the liquid in the run-off lines in to the compartment. Civacon does not agree with this practice because the pressure created by extra liquid being forced in to the compartment will probably result in the Pressure Vacuum vent lifting and releasing additional VOC's in to the atmosphere.

New Product Development

OPW has over 50 year's experience of designing valves and systems for the safe controlling of hazardous liquids and gases in the road and rail transportation industry globally. Civacon already has a patented system capable of solving the issues raised above. We also have continuing product development programs that could provide solutions at a lower cost. However, because of the nature of this problem Civacon's approach would be for lengthy and costly field testing program before we could mass release a product to the market.



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Conclusions

- Civacon believe this proposal would be very costly to the industry with no real proven benefits to anyone
- The data does not support there is a safety issue to be addressed
- There would be a potential increase in VOC releases if wet lines were mandated using current technologies.
- If mandated for new trailers only, new product development costs will be difficult to recover.

If you have any further questions or comments please do not hesitate to contact us.

Sincerely

Simon Hill

Director – Global Cargo Tank Business Unit

Civacon Knappco

Kansas City MO