

## *Fuel Quality*

The DOD requires carriers to have processes that ensure the quality of fuel dispensed into their aircraft is acceptable. Most do an outstanding job of this at primary operating bases and regularly scheduled locations; it's the non-routine or ad hoc locations (where carriers often operate for the DOD) that are sometimes overlooked. Here are three questions that, if answered by your written policies and procedures, should remove all doubt as to whether or not you are meeting the requirement.

1. How do your aircrews and maintenance personnel know that there has been no oversight at non-routine locations and when extra actions (ad hoc procedures) on their part are required?

Regardless of whether you expect maintenance or operations to verify fuel quality, there must be some means by which your personnel know these extra actions are necessary. This could be a note on the dispatch release, a mandatory review of an approved fuel vendor list, or notification through maintenance control, among others.

2. What steps need to be taken to ensure fuel is contaminant free?

One reliable method to ensure the fuel is clear is to ask the vendor to pour a sample. A typical white-bucket test is a widely accepted procedure; however, personnel must be trained to judge the fuel quality. As an alternative to visually inspecting the fuel, a review of the vehicle/equipment inspection log and a check of the equipment filter change date could give an adequate indication of the quality of fuel being provided.

3. How is compliance with this procedure documented?

There must be an audit trail. This could be something as simple as annotating compliance on the fuel receipt, in the logbook, or on some specially developed form. Some companies have the crews verbally pass the information back to their operation center and track compliance in a dispatch log. How you document this is your call, we just need to be able to verify its accomplishment.

The DOD has into-plane contracts at many locations where they are already providing oversight of fuel vendors. The DOD utilizes Military Standard 1548G, which is standard practice for into-plane servicing of fuels at commercial airports. Mil-Std-1548G is a compilation of Air Transport Association Specification 103, augmented with additional DOD requirements. These documents provide guidance for inspections of fueling facilities/equipment and periodic sampling of fuel.

\*\*Use of these contract fuel providers meets the DOD requirement for fuel quality oversight/verification as long as the carrier proactively ensures the provider is listed as currently approved on the Defense Logistics Agency Energy website at <http://www.energy.dla.mil/Pages/default.aspx>.

Bottom line, we require a documented process to ensure the fuel you dispense into your aircraft is contaminant free. If you have any questions please contact one of our maintenance evaluators at (618) 229-4343.

### ***Uploading fuel at DOD bases***

Conducting oversight of fueling activities at DOD facilities can be a challenge, if not impossible. There have been instances when PMIs have expressed that uploading fuel at a DOD facility does not relieve the carrier of the responsibility to provide CFR required oversight and fuel quality verification. We understand both positions on this subject and have discussed this with the FAA. Under certain circumstances, there is an avenue for exemption/deviation from a CFR requirement. You may want to discuss such an exemption with your principals if this situation is raising a question of regulatory compliance. Our office cannot direct an installation to allow a carrier to perform an audit of a fuel facility. We have been able to provide carriers and principals the inspection guidance used at the military installations to provide at least some assurance that there are policies and procedures in place to ensure fuel quality at DOD facilities. DOD into-plane requirements are derived from MIL-STD-1548G, Air Transport Association Specification 103, and augmented with each department's additional criteria. In most cases, the DOD performs more lab testing on their fuel than the commercial industry requires. We are confident you are receiving quality fuel at our facilities and understand that most often, with the exception of ad hoc testing, you will not be permitted to conduct an audit of those fueling operations.