April 16, 2012

Ms. Elizabeth McDermott
Office of Underground Storage Tanks
Mail Code 2822T
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC  20460
Via email: medermott.elizabeth@epa.gov

Docket ID No. EPA-HQ-UST-2011-0301

Dear Ms. McDermott,

The Renewable Fuels Association (“RFA”) appreciates the opportunity to comment in support of the Environmental Protection Agency’s (“EPA”) Proposed Rule: Revising Underground Storage Tank Regulations- Revisions to Existing Requirements and New Requirements for Secondary Containment and Operator Training, Proposed Rule 76 Fed. Reg. 71,708. RFA is the national trade association for the domestic ethanol industry. Our membership includes ethanol producers and suppliers, gasoline marketers, agricultural organizations and state agencies dedicated to the continued expansion and promotion of fuel ethanol.

RFA supports the proposed rule. Specifically, RFA believes EPA’s modification to the definition of motor fuel and the inclusion of a detailed and stringent equivalency program for determining materials compatibility of UST systems is necessary to safely but efficiently accommodate new fuels coming into the marketplace. The Energy Independence and Security Act of 2007 encourages new renewable fuels and fuel blends to be commercialized. This rulemaking provides a sound, technical process to determine “fit for purpose” criteria with existing fueling infrastructure.

RFA also supports the proposed pathways for demonstrating UST and associated equipment compatibility: certification or listing by an independent test laboratory, equipment manufacturer approval, or another method determined by the implementing agency to sufficiently protect human health and the environment. RFA believes it beneficial to allow the proposed flexibility to state level regulating agencies to develop and implement suitable protocols that demonstrate compatibility. An alternate certification procedure for UST and associated equipment is necessary and provides cost-effective options for retailers desiring an expansion of their fuel offerings. UST manufacturers are uniquely qualified to demonstrate compatibility of their equipment.
with new fuel blends. Equipment manufacturers dictate the specifications and materials used in the production of US equipment which are required for determining compatibility. Further, allowance of a professional engineering review and compatibility determination is in line with other important environmental programs such as the Spill Prevention Control and Countermeasures (SPCC) and Renewable Fuels Standard 2 (RFS2).

Thank you in advance for the opportunity to comment on this important matter. If you have any specific questions, please contact Kristy Moore, RFA Vice President for Technical Services at 309-830-6154.

Respectfully,

Bob Dinneen
President & CEO