



Steel Tank Institute Steel Plate Fabricators Association

December 15, 2010

Andrea Barbery
Office of Underground Storage Tanks
Mail Code 5402P
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460
barbery.andrea@epa.gov

Re: Compatibility of Underground Storage Tank Systems With Biofuel Blends,
Docket ID No.EPA-HQ-UST-2010- 0651

Dear Andrea :

I am writing in response to the request for comments on the proposed guidance issued on November 17, 2010.

Factory fabricated steel tanks are compatible with all blends of ethanol . As with all fuels, STI recommends that tank owners implement a maintenance program for all tanks and associated equipment. If converting a storage system to E85 from another use, it is important to thoroughly clean the system prior to use as ethanol is an excellent cleaning agent.

Testing has been done proving compatibility of steel by several sources including STI (through Battelle), SwRI and DNV.

- DNV data is posted at,
<http://www.steeltank.com/Publications/NewsUpdates/Details/tabid/368/ArticleId/6/Ethanol-Test-Results.aspx>
- STI's test report, "Corrosion Analysis of Methanol/Fuel Blends on Carbon Steel", is available at:
<https://www.steeltank.com/Publications/PublicationsIndex/tabid/108/Default.aspx>
- STI's test report for biodiesel is available at:
<https://www.steeltank.com/Publications/PublicationsIndex/tabid/108/Default.aspx>
and a summary of the report is available at:
http://www.steeltank.com/Portals/0/~/_Portals/Biodiesel_Study_PR_04.25.08.pdf

UL standards for steel tanks do not include testing for biofuels. UL has stated in the past that because steel is used throughout the entire fuel infrastructure, that steel is considered to be compatible with all transportation fuels. The UL standard for home heating oil tanks, UL 80, does include a provision for fuels up to 20% biodiesel.



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Some of the advantages of steel as a material of choice for use with biofuels are that steel does not permeate, it does not change shape, swell or otherwise transform. Also steel as a material does not change, and is highly unlikely, to change over time. The steel you buy today will be nearly identical to the steel you buy ten years from now.

The bottom line is steel tanks are now and will always be compatible with fuels meeting ASTM fuel standards.

Sincerely,

Lorri Grainawi

Lorri Grainawi
Director of Technical Services