



November 2, 2011

Subject 58

Andrea Barbery
U.S. Environmental Protection Agency
Office of Underground Storage Tanks
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Response to EPA Compatibility Questions for UL58 Tanks Listings

Dear Andrea,

In response to questions related to the compatibility of UL58 Listed Tanks in your July 28 e-mail, we have the following reply:

The UL Listing Marks on Steel Tanks, such as UL58 and UL142, cover "Flammable and Combustible Liquids". These Listings are intended to include petroleum and biofuel blends, which are commercially dispensed and in compliance with an ASTM Fuel Specification, such as:

- a) ASTM D975 - Standard Specification for Diesel Fuel Oils, which includes biodiesel blends up to 5% (B5);
- b) ASTM D7467 - Standard Specification for Diesel Fuel Oils, Biodiesel Blends, which includes biodiesel blends in the 6%-20% range (B6-B20);
- c) ASTM D4814 - Standard Specification for Automotive Spark-Ignition Engine Fuel, which includes gasoline or oxygenated gasoline, with ethanol blends up to 10% (E10);
- d) ASTM D5798 - Standard Specification for Ethanol Fuel Blends for Flexible-Fuel Automotive Spark-Ignition Engines, which includes ethanol-gasoline blends in the 51%-83% range (E51-E83); and
- e) Mid Range Ethanol Blends in the 11%-50% range (E11-E50) using variable mixtures of ASTM D4814 low blend ethanol and ASTM D5798 high blend ethanol

Based on the combination of required metal types, grades, thicknesses and established engineering principles of steel compatibility with flammable and combustible liquids, which are also recognized by Fire Codes, such as NFPA 30 and NFPA 30A, certification to the appropriate standard is one factor in determining compatibility with fuels. However, as with any component that contains fuel in a typical fuel storage or dispensing system, additional factors of compatibility are highly dependent upon site preparation and installation, local soil and environmental conditions, fuel type(s), blend level(s) and additives, potential fuel contaminants, component or system monitoring, and mitigation methods used to resist fuel and material changes.

However, it is important to note these critical use factors are the same, regardless of the component material (metallic, nonmetallic or composite) and Certification requirements.

In addition, regular inspection and maintenance to assess acceptable compatibility by the owner/operator and local authority having jurisdiction must be conducted in accordance with recommended practices and/or regulations, and if necessary, appropriately address the root problem(s) of reduced compatibility, as defined by the State and/or Federal regulations, and/or repair/replace the component prior to a loss of containment.

Finally, UL Standards represent the minimum construction and/or performance requirements that a product must comply with for a Listing, and is not a guarantee or warrantee.

Should you have any questions related to this Bulletin, please contact the undersigned.

Sincerely,



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