

### Chemistry of Underground Storage Tank (UST) Compatibility with Biofuels

#### Amber Camarena, Environmental Scientist Tu-C2 February 27, 2024



**26th California Unified Program Annual Training Conference** February 26-29, 2024

### Introduction



#### Why? Mission critical December 31, 2025 Biofuel popularity rising

≻ What?≻ How?

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## Agenda

- > What?
- Statutes, regulations & violations
- Chemistry of motor vehicle fuels
  - Biofuel benefits and drawbacks
- Biofuel compatibility studies
- ≻ How?
  - Demonstrating compatibility









**"Compatible" –** The ability of two or more



substances to maintain their properties upon contact with one another for the design life of the tank system.

California Health and Safety Code (H&SC), div. 20, ch. 6.7, § 25281



### Definition

"Biofuel" –

CALIFORNI/

Liquid fuel produced by **renewable** sources of biomass. Animal waste





Oilseed crops

Wood



**Biomass** 



Municipal solid waste/ trash

www.climatehubs.usda.gov/hubs/international/topic/biomass-energy

Algae/ kelp

Crop waste

Food waste













### Agenda

### ≻Why?

- Biofuel popularity rising
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- Chemistry of motor vehicle fuels
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- Demonstrating compatibility





"Alternative Diesel Fuels Reporting Summaries." *California Air Resources Board* ww2.arb.ca.gov/resources/documents/alternative-diesel-fuels-reporting-summaries





20 percent domass-based diesel or biodiesel



Renewable Biodiesel B20

200

PUSH HERE





"Alternative Fueling Station Locator." U.S. Department of Energy, Alternative Fuels Data Center afdc.energy.gov/stations

#### FlexFuel E85

Cash Accepted

REMISES ARE PROTECTED BY

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-

Inside

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HexFueless Ethanol Mexical and Filt All Mexicas Conserve gener (Mexicas Trees are gener (Mexicas Trees are gener (Mexicas)

E85

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85%

E-bronza

Sale S Gations

E:85

-

E:03

E:85

Vehicles

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thanol

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xFuelE85

EVENEL VEHICU

E85

HIGH PERFORMANCE FUEL Increases power & acceleration High-octane performance Reduces emissions & pollution STOP

ETHANOL

STOPI

E485

E-85

85% Ethanol

-85

Sale S

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E085

100±

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ETHANOL

STOP!

LEXIBLE FUEL VEHICLES

High-Octane Performance

**Cleaner Emissions** 

Made in the USA

E-85

FLEXFUEL

FLEX FUEL

E-85

ANARMING )

START

TEXELEL

-

E485

PLEXFUEL

Internations.

For Flex Fuel

Vehicles High-Octane Performance Cleaner Emissions Made in the USA

### Agenda

#### ≻What?

- Biofuel popularity rising
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### "Primary containment shall be ... compatible with the substance stored."

H&SC §§ 25291(a)(1), 25290.2(C)(1), 25290.1(C)(1)







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### Regulations

§ 2631.1(a): Owners and operators must use a UST system made of or lined with materials that are compatible with the substance stored.



California Code of Regulations, tit. 23, div. 3, ch. 16 (UST Regulations)

### Regulations

§ 2660(m): Materials used in repairs and upgrades shall be compatible with existing materials and shall not be subject to deterioration...



CALIFORNIA

- UST Regulations

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### Violations



- UST Design/Construction Compatibility: UST system is not made of or lined with materials that are compatible with the substance stored in the UST system.
- 2. Compatibility records: Failure to submit and/or maintain documentation regarding compatibility for UST system components.



### Agenda



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# **Motor Vehicle Fuel Types**

### **Ethanol Fuel**

Made up of gasoline blended with >10% denatured ethanol

- E15: 10.5-15% ethanol
- **E85** aka flex fuel: 51-83% ethanol

![](_page_23_Picture_5.jpeg)

![](_page_23_Picture_6.jpeg)

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![](_page_23_Picture_8.jpeg)

![](_page_24_Picture_0.jpeg)

### **Motor Vehicle Fuel Types** Biodiesel

"Neat biodiesel" or B100 is pure biodiesel meeting the American Society of Testing and Materials International (ASTM) standard D6751

- B5 (regular diesel)
- B6 through B20
  - must meet ASTM standard D7467
  - Section Se

regulatory purposes

![](_page_25_Picture_6.jpeg)

![](_page_25_Picture_7.jpeg)

# Biodiesel

### is mono-alkyl esters of long chain fatty acids derived from veg oil and animal fats

"Chemistry of Biodiesel." YouTube, uploaded by Biodiesel Education, 13 Nov. 2017 www.youtube.com/watch?v=47tGa-iOtLU

# **Fatty Acids**

# Triglycerides

## **Esters**

"Chemistry of Biodiesel." YouTube, uploaded by Biodiesel Education, 13 Nov. 2017 www.youtube.com/watch?v=47tGa-iOtLU

# 

![](_page_27_Picture_5.jpeg)

# **Transesterification Reaction**

--->

triglycerides catalyst arcohol

fatty esters

![](_page_28_Picture_3.jpeg)

"Chemistry of Biodiesel." *YouTube*, uploaded by Biodiesel Education, 13 Nov. 2017 30 www.youtube.com/watch?v=47tGa-iOtLU

#### Average Emissions Impact of Biodiesel for Heavy-Duty Highway Engines

![](_page_29_Figure_1.jpeg)

"Biodiesel Vehicle Emissions." U.S. Department of Energy, Alternative Fuels Data Center afdc.energy.gov/vehicles/diesels\_emissions.html

### Agenda

![](_page_30_Picture_1.jpeg)

- Biofuel popularity rising
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![](_page_30_Picture_7.jpeg)

## **Compatibility Studies – Ethanol Blends**

> Sealants

![](_page_31_Picture_2.jpeg)

- > Plastics
  - Thermoplastics & Thermosets
- > Metals

#### > Elastomers

![](_page_31_Picture_7.jpeg)

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### **Compatibility Studies – Ethanol Blends**

![](_page_32_Figure_1.jpeg)

Kass, M. D., et al. "Intermediate Ethanol Blends Infrastructure Materials Compatibility Study: Elastomers, Metals, and Sealants." Oak Ridge National Lab., ORNL/TM-2010/326, Mar. 2011, pp. 19, 40, doi.org/10.2172/1007836

### **Compatibility Studies – Ethanol Blends**

### **Plastics**

![](_page_33_Picture_2.jpeg)

![](_page_33_Picture_3.jpeg)

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 9, doi.org/10.2172/1039968

### **Plastics Tested with Ethanol Fuel**

**Thermoplastics** 

![](_page_34_Picture_1.jpeg)

#### Thermosets

High-performance polymers Fluoropolymers: Polytetrafluoroethylene (PTFE aka Teflon) & Polyvinylidene fluoride (PVDF) Polyphenylene sulfide (PPS)	<b>Polyester resins</b> Isophthalic polyester (2 grades) Terephthalic polyester
Mid-range polymers Polyesters: Polyethylene terephthalate (PET), PETG (copolymer), Polybutylene terephthalate (PBT) Acetals: Polyoxymethylene (POM) (homopolymer & copolymer) Nylons: nylon 6, nylon 6/6, nylon 12, and nylon 11	Vinyl ester resin
Commodity (low-cost) polymers Polypropylene (PP) Polythiourea (PTU) High-density polyethylene (HDPE) & fluorinated (F-HDPE)	<b>Epoxy resins</b> (2 curing conditions)

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 4, doi.org/10.2172/1039968

### Thermoplastics – High-performance and mid-range polymers

![](_page_35_Figure_1.jpeg)

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, pp. 19, 24, doi.org/10.2172/1039968
# Thermoplastics – Mid-range and commodity polymers; Thermoset resins



Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, pp. 20, 24, doi.org/10.2172/1039968

## Thermoset resins



Both

epoxy resins

failed



#### All Bad w/out fiber reinforcement

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 21, doi.org/10.2172/1039968

## Plastics



#### swell & fuel retained after drying



Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 27, doi.org/10.2172/1039968



## Minor corrosion regardless of ethanol %Most corrosion E25Thin protective film formed

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, pp. 50-51, doi.org/10.2172/1039968

### **Bare Metals**





#### Carbon steel

#### Nickel



#### Very minor corrosion

Minor corrosion E50 & E85

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, pp. 51-52, doi.org/10.2172/1039968



#### Nickel-plated aluminum w/ partially exposed Al





#### Pitting but no corrosion

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 55, doi.org/10.2172/1039968



#### Zinc-plated steel plating intact



E85

#### Lead-plated steel plating intact





#### **Minor corrosion**

Kass, Michael D., et al. "Compatibility Study for Plastic, Elastomeric, and Metallic Fueling Infrastructure Materials Exposed to Aggressive Formulations of Ethanol-Blended Gasoline." Oak Ridge National Lab., ORNL/TM-2012/88, May 2012, p. 54, doi.org/10.2172/1039968

## **Biofuel Reactivity**



Acceptable	NOT Compatible		
<b>Metal</b> Steel (carbon & stainless) Bronze	Galvanized steel (zinc) Aluminum (constant contact) Terne-plated steel (lead-tin alloy coating) Lead & lead-based solder		
Nonmetal			
Teflon Polypropylene High-density polyethylene Some newer FRP (UL)	Natural & urethane rubber Polyurethane Polyvinyl chloride Polythiourea	Cork gasket material Epoxy resins Alcohol-based pipe dope Methyl-methacrylate plastics	

"Handbook for Handling, Storing, and Dispensing E85 and Other Ethanol-Gasoline Blends." U.S. Department of Energy, DOE/GO-102016-4854, Feb. 2016, p. 8, afdc.energy.gov/files/u/publication/ethanol\_handbook.pdf; "Fuel Ethanol Industry Guidelines, Specifications and Procedures." Renewable Fuels Association, July 2018, pp. 36-38, d35t1syewk4d42.cloudfront.net/file/1989/Fuel-Ethanol-Industry-Guidelines-Specifications-2018.pdf

## **Biofuel Reactivity**



	Acceptable	NOT Compatible
Metal	Aluminum Steel (carbon & stainless)	Lead & lead-based solder Tin Copper, brass, bronze Zinc, galvanized metal Terne-coated sheet metal
Nonmetal	Polytetrafluoroethylene (Teflon) Fluorinated plastics Nylon Fiberglass (tanks & piping)	Natural rubber Polypropylene Polyvinyl Polyethylene Neoprene Nitrile

McCormick, Robert. "Biodiesel Handling and Use Guide," 6<sup>th</sup> ed. *National Renewable Energy Lab.*, NREL/TP-4A00-86939, Sep. 2023, pp. 47-48, afdc.energy.gov/files/u/publication/biodiesel\_handling\_use\_guide.pdf

## Agenda

## ≻How?

- Biofuel popularity rising
- Compatibility statutes, regulations & violations
- Chemistry of motor vehicle fuels

   Biofuel benefits and drawbacks
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- Demonstrating compatibility



(1) A written approval from an **independent testing organization**;

(2) A written approval from a state registered professional engineer; or

(3) A written affirmative statement of compatibility from the manufacturer(s).

- UST Regulations § 2631(l)



## **Existing Tank Compatibility**

- USTs installed on or before January 1, 1984
- Tanks must be compatible.
- Not required to **demonstrate** compatibility until: 1) Making **repairs** or **upgrades**, or 2) Before **changing** the substance currently stored in the UST.

§ 2640.1: Thirty days before changing to a motor vehicle fuel containing a concentration greater than 10% ethanol or 5% biodiesel, owners or operators shall demonstrate compatibility by submitting written approval from an independent testing organization.

- UST Regulations

#### Acceptable Mechanisms to Demonstrate Compatibility for USTs

	Key
	Independent testing
	organization approval
E	California professional
	engineering statement
Μ	Manufacturer's statement
	of compatibility

	Construction Type	
Component Type	Single-Walled	Double-Walled Tank
Tank	Idin	Idin
Primary Containment		or & M
(includes any integral secondary containment)	§§ 2633(b) & 2640.1	§§ 2631(b) & (j)
Non-Integral Secondary Containment		Е
(vaults)		§ 2631(d)

"Upgrade, New Construction, and Compatibility Requirements." California Code of Regulations, Title 23, Division 3, Chapter 16. Appendix 1, p. 5, Jan. 2019, www.waterboards.ca.gov/ust/adm\_notices/fed\_rec\_regs/new\_con\_up\_compat\_v1\_0.pdf

### Acceptable Mechanisms to Demonstrate Compatibility for USTs

	Кеу
	Independent testing
	organization approval
E	California professional
	engineering statement
Μ	Manufacturer's statement
	of compatibility

	Construction Type	
Component Type	Single-Walled	Double-Walled
Piping	Turik	Turik
Primary Containment		or & M
(includes any integral secondary containment)	§§ 2633(b) & 2640.1	§§ 2631(b) & (j)
Non-Integral Secondary Containment	E	E
(under-dispenser containment and sumps)	§§ 2631(d) & 2666(b)(2)	§ 2631(d)

"Upgrade, New Construction, and Compatibility Requirements." California Code of Regulations, Title 23, Division 3, Chapter 16. Appendix 1, p. 5, Jan. 2019, www.waterboards.ca.gov/ust/adm\_notices/fed\_rec\_regs/new\_con\_up\_compat\_v1\_0.pdf

#### Acceptable Mechanisms to Demonstrate Compatibility for USTs

	Key
	Independent testing
	organization approval
E	California professional
	engineering statement
Μ	Manufacturer's statement
	of compatibility

	Construction Type	
Component Type	Single-Walled Tank	Double-Walled Tank
Spill Containers, Overfill Prevention Equipment, and Ancillary Equipment	<b>I, E, or M</b> §§ 2631(I) & 2665(b)	I, E, or M § 2631(I)
Leak Detection	<b>I Or I &amp; M</b> §§ 2630(d), 2638(a), & 2643(f)	<b>I or I &amp; M</b> §§ 2630(d) & 2638(a)

"Upgrade, New Construction, and Compatibility Requirements." California Code of Regulations, Title 23, Division 3, Chapter 16. Appendix 1, p. 5, Jan. 2019, www.waterboards.ca.gov/ust/adm\_notices/fed\_rec\_regs/new\_con\_up\_compat\_v1\_0.pdf



May 2, 2018

#### Bio Fuels Compatibility

Modern Welding Company, Inc., a trusted and experienced steel tank manufacturer for more than 85 years, asserts that this letter shall apply to all makes and models of steel tanks that we have manufactured during any time period including all:

- GLASTEEL<sup>™</sup> underground storage tanks
- GLASTEEL II<sup>™</sup> underground storage tanks
- Single-wall underground storage tanks
- · Double-wall underground storage tanks
- Sti-P3<sup>®</sup> underground storage tanks
- ACT-100<sup>®</sup> underground storage tanks
- ACT-100-U<sup>®</sup> underground storage tanks
- Non-UL storage vessels

All steel tanks are compatible and suitable for use with all fuel blends meeting ASTM standards, including ethanol blends from E10 to E100. All tanks are also compatible and suitable for use with all blends of biodiesel, from B2 to B100. Testing has been done proving compatibility of steel by several sources, including:

Oak Ridge National Lab sponsored by DOE in collaboration with Underwriters Laboratories; National Renewable Energy Laboratories; Southwest Research Institute; Steel Tank Institute (through Battelle). To access test reports and other information on biofuels: Visit <u>www.steeltank.com</u> for test data and information on biofuel testing and steel compatibility.

Tank maintenance is a critical component in any fuel storage and dispensing program. With new or different product blends being introduced to the storage tank system, proper cleaning of the tank should be accomplished. This and other pertinent maintenance may be found in the following publications:

Steel Tank Institute's Recommended Practice RP-R111, "Storage Tank Maintenance"

Petroleum Equipment Institute's, RP900-17, Recommended Practices for the Inspection and Maintenance of UST Systems.

Questions or comments you may have about our products or about this statement, please call 270-685-4400.

Sincerely,

Stephen L. Fort V.P. Sales and Marketing CORPORATE OFFICE: Owensboro, Kentucky (270) 685-4400

#### stispfa.org/resource/fuels-compatibility-statement/

"All steel tanks are compatible and suitable for use with all fuel blends meeting ASTM standards, including ethanol blends from E10 to E100. All tanks are also compatible and suitable for use with all blends of biodiesel, from B2 to B100. Testing has been done proving compatibility of steel by several sources..."

## Fiberglass UST Manufacturer Compatibility with biodiesel up to **B100**

AI IFORNI

Manufacturer	Compatibility Letter Available
<b>Containment Solutions</b>	$\checkmark$
Xerxes	$\checkmark$
Owens Corning	×

### Ethanol Compatibility Timeline for Fiber Reinforced Plastic USTs



	Кеу
	Underwriter Laboratories (UL)
	approval/listing for "Alcohol
	Mixtures" or "Alcohol"
Μ	Manufacturer's affirmative
	statement of compatibility

Tank Manufacturer: Owens Corning Fiberglas <sup>™</sup> Corp.			
	Applicable for use with Ethanol Concentrations of		
<b>Dates Manufactured</b>	1-10%	11-30%	31-100%
	(E1-E10)	(E11-E30)	(E31-E100)
Prior to Jan. 1981	None Available	None Available	None Available
Jan. 1981-Jan. 1984	_	None Available	None Available
Jan. 1984-Jun. 1990	l or M	None Available	None Available
Jul. 1990-Jul. 1991	l or M	l or M	l or M
Jul. 1991-Dec. 1994			

"Compatibility of Underground Storage Tanks Storing Gasoline with Ethanol." State Water Resources Control Board, 24 July 2015, p. 3 www.waterboards.ca.gov/ust/tech\_notices/docs/ethanol\_tank\_compatibility\_letter.pdf

### Ethanol Compatibility Timeline for Fiber Reinforced Plastic USTs



	Кеу
	Underwriter Laboratories (UL)
	approval/listing for "Alcohol
	Mixtures" or "Alcohol"
Μ	Manufacturer's affirmative
	statement of compatibility

Tank Manufacturer: ZCL   Xerxes Corporation				
	Applicable for use with Ethanol Concentrations of			
<b>Dates Manufactured</b>	1-10%	11-30%	31-100%	
	(E1-E10)	(E11-E30)	(E31-E100)	
Prior to Feb. 1981	None Available	None Available	None Available	
Feb. 1981-Jan. 1984		None Available	None Available	
Jan. 1984-Apr. 1990	l or M	None Available	None Available	
Apr. 1990-Jul. 1991	l or M	l or M	l or M	
Jul. 1991-Present				

"Compatibility of Underground Storage Tanks Storing Gasoline with Ethanol." State Water Resources Control Board, 24 July 2015, p. 3 www.waterboards.ca.gov/ust/tech\_notices/docs/ethanol\_tank\_compatibility\_letter.pdf

### Ethanol Compatibility Timeline for Fiber Reinforced Plastic USTs



Кеу				
	Underwriter Laboratories (UL)			
	approval/listing for "Alcohol			
	Mixtures" or "Alcohol"			
Μ	Manufacturer's affirmative			
	statement of compatibility			

Tank Manufacturer: Containment Solutions, Inc. (Fluid Containment Inc.)					
	Applicable for use with Ethanol Concentrations of				
<b>Dates Manufactured</b>	1-10%	11-30%	31-100%		
	(E1-E10)	(E11-E30)	(E31-E100)		
Jan. 1995 - Present					
Other Fiber Reinforced Plastic Tank Manufacturers					
Prior to Jul. 1991	l or M	l or M	l or M		
Jul. 1991 - Present					

"Compatibility of Underground Storage Tanks Storing Gasoline with Ethanol." State Water Resources Control Board, 24 July 2015, p. 3 www.waterboards.ca.gov/ust/tech\_notices/docs/ethanol\_tank\_compatibility\_letter.pdf

## **Online Sources**



## PEI

#### **UST Component Compatibility Library**

#### pei.org/resources/ust-component-compatibility-library/



### PEI Young Executives >> Career Resources

Library

Wiki

#### Compliance Letters by Manufacturer

## **Online Sources**

## **UL Solutions**



#### www.ul.com/resources/apps/ul-solutions-fuel-compatibility-tool



#### UL fuel compatibility tool

Fueling stations and components

Helping to meet EPA, state or authorities fuel compatibility requirements.

## **Online Sources**

## Product iQ

ALIFORNIA

productiq.ulprospector.com/en





#### Search Database



**Review Results** 

Enter a keyword to search certification information. Your keyword can be a company name, a model number or specific terms such as a category description (CCN) or a UL Solutions file number Search through the results. Your search term may appear anywhere within the associated full document, including portions that may not appear in this application.



#### **Certification Information**

Select and view the certification information for the items you find. Results may include products or components within products.

## **Online Sources** <u>flexfuelforward.com/toolkit/flexcheck/</u> Flex Forward – American Coalition for Ethanol

Flex Check features nearly the entire inventory of fueling infrastructure parts you'll need to consider when adding E15 or higher blends of ethanol.

Search components by manufacturer, model number, or component category (example: above ground equipment, above ground tank, overfill prevention, piping, pumping equipment, release detection, and others). For tips on how to search efficiently, skip down below. If you have questions, just give us a shout. We're here to help.

Source: National Renewable Energy Labs (NREL) reports and the American Coalition for Ethanol

List of All Compliance Letters E15 and Flex Fuel Roadmap



Manufacturer:

Model:

Model

Category:

Nothing selected

Clear filters

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## Conclusion

### December 31, 2025



## NO FUEL DELIVERY





# **Any Questions?**

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## Works Cited

"Alternative Diesel Fuels Reporting Summaries." California Air Resources Board, ww2.arb.ca.gov/resources/documents/alternative-diesel-fuels-reporting-summaries. Accessed Feb. 2024.

"Alternative Fueling Station Locator." U.S. Department of Energy, Alternative Fuels Data Center, afdc.energy.gov/stations. Accessed Jan. 2024.

"Biodiesel Vehicle Emissions." U.S. Department of Energy, Alternative Fuels Data Center, afdc.energy.gov/vehicles/diesels\_emissions.html. Accessed Jan. 2024.

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"Compatibility of Underground Storage Tanks Storing Gasoline with Ethanol." State Water Resources Control Board, 24 July 2015, p. 3, www.waterboards.ca.gov/ust/tech\_notices/docs/ethanol\_tank\_compatibility\_letter.pdf.

"Fuel Ethanol Industry Guidelines, Specifications and Procedures." Renewable Fuels Association, July 2018, pp. 36-38, d35t1syewk4d42.cloudfront.net/file/1989/Fuel-Ethanol-Industry-Guidelines-Specifications-2018.pdf.



## Works Cited (cont.)

"Handbook for Handling, Storing, and Dispensing E85 and Other Ethanol-Gasoline Blends." U.S. Department of Energy, DOE/GO-102016-4854, Feb. 2016, p. 8, afdc.energy.gov/files/u/publication/ethanol\_handbook.pdf.

Kass, M. D., et al. "Intermediate Ethanol Blends Infrastructure Materials Compatibility Study: Elastomers, Metals, and Sealants." Oak Ridge National Lab., ORNL/TM-2010/326, Mar. 2011, pp. 19, 40, doi.org/10.2172/1007836.

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McCormick, Robert. "Biodiesel Handling and Use Guide," 6th ed. National Renewable Energy Lab., NREL/TP-4A00-86939, Sep. 2023, pp. 47-48, afdc.energy.gov/files/u/publication/biodiesel\_handling\_use\_guide.pdf.

Roggelin, Ernest M. "Pipes and Sumps – As I See Them: Thoughts from a Florida UST Inspector." L.U.S.T.LINE, Bulletin 47, NEIWPCC, June 2004, Special Appendix, neiwpcc.org/wp-content/uploads/2020/07/supple\_47.pdf.

"Upgrade, New Construction, and Compatibility Requirements." California Code of Regulations, Title 23, Division 3, Chapter 16. Appendix 1, p. 5, Jan. 2019, www.waterboards.ca.gov/ust/adm\_notices/fed\_rec\_regs/new\_con\_up\_compat\_v1\_0.pdf.



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# Appendix



## **Design & Construction**

## USTs installed after July 1, 1991

§ 2631(b): The design and construction of all primary containment including any integral secondary containment system shall be approved by an independent testing organization.

- UST Regulations





## **Design & Construction**

§ 2631(d): A non-integral secondary containment system shall be designed and constructed according to an engineering specification... Materials used shall prevent structural weakening or damage.

- UST Regulations

§ 2631(j): If an independent testing organization approval does not include the compatibility of the hazardous substance stored, an owner or operator may submit a written, affirmative statement of compatibility from the manufacturer(s).

- UST Regulations

§ 2631(I): Owners or operators shall demonstrate compatibility 30 days before beginning to store or changing the hazardous substance, by submitting to the local agency one of the following...

- UST Regulations

§ 2631.1(b): For UST system components installed on or after July 1, 2004, the applicable approvals required shall include a list of the compatible products tested if such testing is required...

- UST Regulations

§ 2711(c): The owner or operator shall notify the local agency at least 30 days before changing the substance currently stored in the UST. The notification shall include compatibility documentation.

- UST Regulations
## **Compatibility Documentation**

§ 2712(b)(5): Documentation of the UST's compatibility with the stored substance shall be maintained for as long as the system is used to store the specific substance.

- UST Regulations

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