USTs and Compatibility

Update 8/28/2020

Below is information about recent documents EPA developed about USTs and compatibility; US Department of Agriculture's (USDA) grant program for equipment compatibility; and background about the compatibility requirement in the 2015 federal UST regulation.

EPA's Recent Documents About USTs And Compatibility

In July 2020, we revised our plain language booklet, *UST System Compatibility With Biofuels* (<u>www.epa.gov/ust/ust-system-compatibility-biofuels</u>) to reflect the most current information we have about biofuels compatibility. The booklet now includes:

- Details about storing 100 percent biodiesel and pipe dope and sealants; previously this
 information was available only in our UST technical compendium about the 2015 regulation
 (www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ustregulation)
- An update on industry changes involving newer fuels, like renewable diesel, recently entering the market in larger volumes
- A revised compatibility demonstration checklist with clearer instructions and additional details; states may modify the checklist for their state-specific regulations

In January 2020, we developed *E15 Compatibility With UST Systems* (www.epa.gov/ust/e15compatibility-ust-systems-statement), a statement that focused on environmentally safe growth of E15 markets. In June 2019, we issued a compliance advisory about technical compatibility requirements for storing E15 per 40 CFR 280.32 (www.epa.gov/sites/production/files/2019-06/documents/complianceadvisory-ust-regs-06-2019.pdf). Both documents provide insights into compatibility, and we designed them to help owners and operators understand about compatibility of storing higher blends of fuels.

USDA's Grant Program For UST Equipment Compatibility

Interest of UST owners and operators in selling E15 fuel—commonly marketed as unleaded 88 continues to grow. Very few stations stored that fuel a few years ago, but now E15 is offered at a couple thousand stations nationwide. In order to compatibly store E15, many owners must change their UST system equipment to ensure the entire system is fully compatible.

To foster the change to E15 compatible UST systems, USDA created a 2020 Higher Blends Infrastructure Investment Partnership (HBIIP) grant program. The program, which accepted grant applications through mid-August, will award \$100 million—of which \$86 million is targeting ethanol systems—to fueling and fueling distribution facilities for equipment upgrades. Grant recipients may use the money to convert their facilities through upgrade or installation of equipment required to ensure all equipment is fully compatible with higher blends of ethanol and biodiesel. Our collaboration with USDA during the grant program design ensured they understood compatibility requirements for UST systems. As a result, the HBIIP grant program included all UST system components as eligible equipment to receive money for upgrades, and this is critical to ensuring full system compatibility.

About Compatibility In UST Systems

As you know, in the 1988 federal UST regulation, EPA required systems to be compatible with fuels stored. Since then, the fuel supply in the United States changed, and we saw unintended UST system consequences that cause equipment to break or increases in releases. As a result, we confirmed the compatibility requirement in the 2015 federal UST regulation and required additional notification,

demonstration, and record keeping actions of owners wishing to store some fuel blends, such as those with more than 10 percent ethanol or more than 20 percent biodiesel.

Ensuring compatibility prior to storing a regulated substance in an existing or new UST system is important. Some UST systems may have been built with components that were not intended for use with fuels owners or operators wish to store today. EPA, state and tribal partners, and UST owners and operators share an interest in keeping UST systems working properly. That helps keeps fuel in tanks and out of the ground, and that's a win for everyone.

I greatly appreciate the continued dedication and efforts of all in the UST community in meeting regulatory compliance requirements as our fuel supply changes. As always, I thank you for all that you do to help keep our environment safe from UST releases, which are a leading source of soil and groundwater contamination.

If you have questions about UST compliance, thoughts on how we can help ensure systems are compatible with changing fuels, or feedback on what we can do to assist in achieving compliance, please contact me or Tony Raia (<u>raia.anthony@epa.gov</u>; 202-566-1021).

Thanks! - Carolyn

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