



December 17, 2010

EPA Docket Center  
Environmental Protection Agency  
Underground Storage Tank (UST) Docket  
Mail Code 2822T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: Docket ID No. EPA-HQ-UST-2010-0651

To Whom It May Concern:

On behalf of the NAFA Fleet Management Association (NAFA), we welcome the opportunity to comment on the Proposed Guidance: Compatibility of Underground Storage Tank Systems with Biofuel Blends.

NAFA is the world's premier fleet professional organization, representing members from all facets of the fleet industry including public and private fleets. The 2100 vehicle fleets managed by NAFA's 3,000 members collectively tally more than 3.5 million vehicles, of which more than 1.1 million are trucks, and of those over 350,000 are medium and heavy-duty trucks.

A significant segment of NAFA's members are responsible for the management of central fueling facilities, including both underground and aboveground storage tank systems. While compatibility of UST systems with Biofuels is a valid concern and needs to be addressed, a recent survey of NAFA members reported no compatibility problems associated with the storage of either biodiesel or ethanol. There were a few operational problems reported, but unrelated to the system and compatibility, such as the gelling of biodiesel during cold weather.

NAFA appreciates the flexibility provided in the Proposed Guidance and offers the following comments.

*Options for Meeting the Compatibility Requirements:* We support both proposed options as acceptable for demonstrating compatibility – use of components certified or listed by an independent test laboratory or approved by the manufacturer. With respect to manufacturer approval, we agree that manufacturer approval should be in writing; indicate an affirmative

statement of compatibility; and be from the equipment manufacturer, not another entity (such as the installer or distributor).

We urge the EPA to consider very carefully the need to provide flexibility to the states who wish to take a different approach for demonstrating compatibility. A state should not be able to supplant EPA's determination that certification by an independent test laboratory or approval by the manufacturer is sufficient to protect human health and the environment. Many NAFA Members are responsible for UST systems in multiple states. Creating a scenario where a fleet manager would have to comply with conflicting state compatibility requirements, rather than EPA's requirements, would be burdensome, costly and unnecessary. We also note that components of UST systems that are certified by a national laboratory or approved by a manufacturer are distributed into many states, if not nationally, and, thus, compatibility requirements should be applied nationally.

*Applicability to Biodiesel Blends:* We strongly believe that EPA should include biodiesel blends in the guidance. Fleets are using hundreds of thousands of gallons of biodiesel blends annually. The use of B20, for example, directly displaces use of petroleum fuels and substantially lowers diesel related vehicle emissions. State and utility fleets rely upon use of B20 in order to meet federally mandated alternative fuel vehicle requirements codified in the Energy Policy Act of 1992 (EPAct).

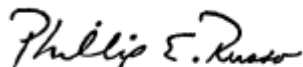
We recommend that the guidance set the biodiesel blend threshold at B20, and allow higher percentage blend if certified to the higher level by a national laboratory or approved by the manufacturer.

*Ability to Demonstrate Compatibility Using the Proposed Guidance:* It may be difficult for some UST owners to demonstrate compatibility for each of the covered components in the UST system. NAFA recommends that the Guidance provide for a reasonable phase-in of the requirements, but on a case-by-case basis.

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Thank you for consideration of these comments.

Sincerely,



Phillip E. Russo, CAE  
Executive Director.