

3199

Kathy Cooper

From: ecomment@pa.gov
Sent: Thursday, March 08, 2018 3:14 PM
To: Environment-Committee@pasenate.com; IRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; apankake@pasen.gov
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program



Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Administration of the Storage Tank and Spill Prevention Program.

Commenter Information:

Jonathan McNeely
Tank Tech Incorporated (jonathan@tanktech.com)
3975 State Hwy H.
Sikeston, MO 63801 US

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IRRC
2018 MAR -8 P 3:23

Comments entered:

Hello and thank you for giving us the opportunity to comment on the upcoming rules,

We respectively suggest that DEP consider a retroactive mandate that would require all single wall USTs be either replaced or upgraded with Double Wall Systems.

Because of the high economic and environmental benefits for PA UST owners/operations, we request that DEP consider adopting the UL1856 Standard into their Rules. A step that many other States have already taken.

The UL1856 Standard gives PA Fuel Marketers UST Upgrade options which will mitigate their environmental risk by upgrading to an Insitu Double Wall tank system without the costly necessity of tank removal.

This UL Standard covers tank replacement alternatives that offer significant financial and logistical benefits to tank owners and encourages increased environmental compliance.

We would greatly appreciate the opportunity to discuss this matter in person with DEP in the very near future.

I have copied and linked the standard outline below, thank you very much for your consideration, we look forward to hearing from you:

UL1856 Outline for Underground Fuel Tank Internal Retrofit Systems

1 Scope

1.1 These requirements cover nonmetallic retrofit systems (products) intended for field installation inside of steel or fiberglass underground fuel tanks in commercial (public) or private (fleet) automotive fueling station applications. These products are intended for containment of typical liquid fuels as identified in this Outline, and may provide other features as described for each specific type of retrofit system.

1.2 These products are nonmetallic thermoset (such as FRP, epoxy, PUR or polyesters) or thermoplastic (such as PE) materials that may or may not be bonded to the interior tank wall, depending upon the system type. These products typically use pre-fabricated sections with coatings applied on site, or homogeneous or layered spray-on/roll-on materials applied on site, and may optionally be covered for minor repair of the host tank.

1.2.1 Lining systems provide only primary containment of stored fuels, and do not add significant structural strength to the host tank.

1.2.2 Upgrade systems provide both primary containment and secondary containment of stored fuels with interstitial monitoring, and are co-structural with the host tank.

1.2.3 Structural systems provide both primary containment and secondary containment of stored fuels with interstitial monitoring, and are self-structural without the host tank.

1.3 These products are intended for containment of automotive fuels and exposure to soil fluids that have similar chemical, physical and material compatibility properties as represented by the test liquids in these requirements based on fuels formulated in accordance with 40 CFR Part 80, Regulation of Fuels and Fuel Additives, and meeting the following ASTM Fuel Specifications and blend limitations:

- a) ASTM D-975, Standard Specification for Diesel Fuel Oils, with biodiesel blends up to a maximum of 5 percent (B5);
- b) ASTM D-7467, Standard Specification for Low Blend Biodiesel, with biodiesel blends from 6 to 20 percent (B6 to B20).
- c) ASTM D-4814, Standard Specification for Automotive Spark-Ignition Engine Fuel, gasoline or oxygenated gasoline, with limited ethanol blends up to a maximum of 10 percent (E10);
- d) ASTM D-5798, Standard Specification for Ethanol Fuel Blends for Flexible-Fuel Automotive Spark-Ignition Engines, high blend ethanol, with gasoline/ethanol mixtures blends from 51 to 83 percent (E51 – E83); and
- e) Mid Range Ethanol Blends (E11 to E50) using variable mixtures of ASTM D4814 Low Blend Ethanol and ASTM D5798 High Blend Ethanol

1.4 Products covered by this outline are intended to be installed and used in accordance with one or more of the following:

- a) Flammable and Combustible Liquids Code, NFPA 30;
- b) Code for Motor Fuel Dispensing Facilities and Garages, NFPA 30A;
- c) Uniform Fire Code, NFPA 1;
- d) International Fire Code published by the International Fire Council; or
- e) Other applicable federal and state regulations for the specific product or application it is being utilized in.

1.5 These products are intended for field installation, by only qualified persons, inside the host tank without a need for excessive excavation, in accordance with the manufacturer's instructions

and the local requirements. Prior to installation, cleaning, inspecting, repairing and preparing the host tank interior surface is also conducted by qualified persons in accordance with the manufacturer's instructions.

1.6 These products are intended to be periodically inspected and maintained for continued service, or taken out of service if deemed necessary by qualified persons in accordance with industry recommended practices, the manufacturer's instructions or applicable regulations.

1.7 These products and the manufacturer's installation instructions have not been investigated for their physiological effect, if any, for safety of any persons during the installation process, and the potential risk associated with the opening, entering, purging, cleaning, inspecting, surface preparation, system installation, and testing of a tank that has been used to store flammable or combustible liquids.

1.8 These products and requirements are not intended to cover or evaluate the installation equipment, safety of the installer, compliance with worker safety regulations (such as confined spaces, hazardous locations, or OSHA), or any environmental emissions or disposal regulations, (such as EPA).

1.9 These products have not been evaluated for use after natural disasters, or exposures to chemicals not representative of the test liquids or excessive physical damage beyond the expected installation and uses as identified in these requirements.

1.10 These requirements do not cover additional claims, if any, related to improved fuel quality, nor the effect, if any, of the products material(s) on fuel quality or properties.

1.11 These requirements do not cover thin coatings or paints that may be directly applied to internal tank surfaces, and do not cover flexible or rigid tank bladders that are not directly bonded to internal tank surfaces.

1.12 These requirements do not cover external corrosion protection systems for steel underground tanks, which are found in UL1746 – External Corrosion Protection Systems for Steel Underground Storage Tanks.

Sincerely,

Jonathan McNeely
VP of Corporate Development
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3975 State Hwy H.
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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley