



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

Published in the Federal Register 11-16-2010, Page 70241

Comments to EPA proposed guidance for establishing compatibility of underground storage tank systems with biofuel blends

Owens Corning manufactured and sold underground storage tanks between 1965 and 1994. The Company's fiberglass tank division was sold December 31, 1994. Owens Corning has not manufactured or sold tanks since that time. Attached is a letter we provided to our customers in April 1995 that sets out, by type of tank and year sold, the warranties and Underwriters Laboratories (UL) listings pertaining to alcohol and ethanol-blend fuels.

With the limited exceptions that are set forth in the April 1995 letter, Owens Corning fiberglass tanks were not warranted, tested for, or intended to store fuel with more than a 10% ethanol blend. Because of these limitations and the fact that ethanol blends greater than 10% (such as E12 or E15) are significantly more aggressive than E10 blends, we cannot confirm compatibility of ethanol blends greater than 10% with the vast majority of our tanks. Therefore, except as expressly warranted, we strongly recommend that they not be used for storage of such blends.

The exact number of Owens Corning tanks still in service is unknown given tank removals, relocations, and abandonments, but we can provide the following information regarding the tanks sold:

Single-Wall Tanks (SWT): No Owens Corning SWT was ever warranted or intended to store fuel with more than a 10% ethanol blend. Because of the nature of the design of a SWT, a leak in the tank could cause an immediate release. Accordingly, without the installation of an additional liner (discussed below), Owens Corning SWTs must not be used for storage of fuel with more than a 10% ethanol blend.

Double-Wall Tanks (DWT):

Prior to July 1, 1990: With the exception of a small number of specially manufactured tanks, DWTs sold before July 1, 1990 were not warranted or intended to store fuel with more than a 10% ethanol blend. Accordingly, without the installation of an additional liner (discussed below), Owens Corning DWTs sold before July 1, 1990 must not be used for storage of fuel with more than a 10% ethanol blend.

After July 1, 1990: Owens Corning DWTs that were manufactured and sold between July 1, 1990 and December 31, 1994 were warranted for the storage of fuel with no limitation on ethanol content.

Possibility of Upgrade: Existing installed fiberglass tanks that are not currently compatible with ethanol blends greater than 10% can be upgraded by relining the entire interior of the tank. While there may be other providers, the only commercially available system we are aware of today that provides a reliable, high performing lining is sold and installed by Containment Solutions, Inc. It is called a "BTU – Biofuel Tank Upgrade," and has been available for several years.

Identification of Tank Owners: Owens Corning sold its tanks to tank installers as well as directly to tank owners and operators. In some cases, Owens Corning did not ship the tank to the actual installation location. Accordingly, Owens Corning does not have accurate or complete identification or contact information for the owners of its tanks.

Establishing Compatibility: The EPA has proposed three methods as effective options for demonstrating compatibility. We provide the following comments.

1) Certification Or Listing By An Independent Test Laboratory

Historically, the tank industry was required to have tanks tested and listed by independent testing labs (primarily UL). UL also engaged in an auditing process to ensure that the listed products actually met the manufacturing specifications. Given the level of risk involved in the underground storage of biofuels, it is our opinion that EPA-approved certifications should be limited to a UL listing and the auditing that accompanies that listing. Obviously, Owens Corning tanks, which have been in service for several years, would be incapable of being certified through this process.

2) Equipment Manufacturer Approval

As stated above, except as expressly warranted, Owens Corning does not approve the use of its fiberglass underground storage tanks for the storage of gasoline with ethanol blends of greater than 10%.

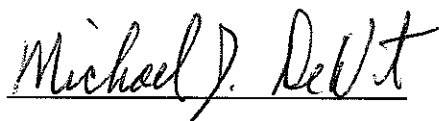
3) Another Method Determined By The Implementing Agency To Sufficiently Protect Human Health And Environment

We cannot comment on the validity of specific alternative methods as no details are provided. However, EPA should assure that any proposed alternative methods are fully reviewed by all stakeholders, including equipment manufacturers, before such methods are approved in the future. We would suggest, as mentioned in API Recommended Practice 1626, Second Edition, August 2010, page 31, that scientific research should be the basis for any decision on the compatibility of a particular material with a particular fuel. We would also note that all of the compatibility testing conducted over the years by both Owens Corning and UL utilized actual fiberglass tank wall laminate. Failure to use actual

production tank wall laminate (*e.g.*, testing the resin only) could result in misleading conclusions in the prediction of long-term tank performance.

Please feel free to contact the writer if any of the above comments can be clarified.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Michael J. DeWit", written in dark ink. The signature is fluid and stylized, with the first and last names being more prominent than the middle initial.

Michael Dewit
Technical Services Manager
Owens Corning
One Owens Corning Parkway
Toledo, Ohio 44359
419-248-6252

April 14, 1995



To Owens-Corning Tank Customers:

The purpose of this letter is to clarify the use of fiberglass underground storage tanks produced by Owens-Corning for the storage of ether and alcohol fuel blends. All percentages are by volume.

FUELS BLENDED WITH ETHER:

Owens-Corning has extensively tested fuels containing up to 20% MTBE, ETBE, and TAME. The results show very little effect on the laminate, and hence storage of these ether blends in underground storage tanks produced by Owens-Corning from 1964 through 1994 would not void the manufacturer's warranty.

ALCOHOL FUELS:

TANKS MADE PRIOR TO JANUARY 1981:

Tanks produced prior to January 1981 were not warranted for any alcohol or alcohol blend fuels. In addition, these tanks were not tested and listed by Underwriter's Laboratory (UL) for such fuels. The use of alcohol or alcohol blends in tanks produced and sold prior to January 1981 would void both the manufacturer's warranty and the UL listing for the tank.

TANKS MADE BETWEEN JANUARY 1981 AND JUNE 1984:

In December 1981, Owens-Corning completed UL testing and introduced a 30-year warranty on the standard fiberglass tank for 10% ethanol blended fuel. For these tanks, the use of ethanol blends over 10% or any methanol blends in the standard fiberglass tank would void both the manufacturer's warranty and the UL listing for the tank.

For methanol blends or blends of ethanol exceeding 10%, an optional vinylester resin system was UL listed and available as an option from Owens-Corning.

TANKS MADE BETWEEN JULY 1984 AND JUNE 1990:

In July 1984, Owens-Corning completed additional UL testing and introduced a 30-year warranty on the standard fiberglass tank for low levels of methanol such as 90.5% gasoline and 9.5% Oxinol-50 (4.75/4.75 methanol/GTBA). For these tanks, the use of ethanol blends over 10% and methanol blends over 4.75% would void the manufacturer's warranty and the UL listing for the tank.

April 14, 1995

Page Two

TANKS MADE SINCE 1990:

In July of 1990, Owens-Corning issued a 30-year warranty for all levels of alcohol (ethanol or methanol) on standard double wall tanks. These tanks were UL listed for this service.

It is our belief that the prudent tank owner will want to secondarily contain any high level alcohol blends (over 10%), as higher levels could be considered hazardous material as defined in the underground tank regulations published by the federal Environmental Protection Agency. It is our recommendation that double wall fiberglass tanks be used to achieve that secondary containment.

The above should clarify the issue of fuel compatibility warranty coverage and UL listings for ether and alcohol blended fuels stored in tanks manufactured by Owens-Corning between 1964 and December 31, 1994.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Bartlow". The signature is stylized with a large, looped "D" and a cursive "Bartlow".

David Bartlow
Manager, Tanks
Owens-Corning Fiberglas Corporation