

#### **Emerging Fuels**

#### National Tanks Conference September 24, 2025

Tony Raia
U.S. Environmental Protection Agency
Office of Underground Storage Tanks



#### Fuels and Transportation are Changing

#### **Emerging Fuels**

- ULSD/ULSG
- E15/Unleaded 88
- E85
- Biodiesel
- Renewable Diesel
- Isobutanol?
- E-fuels?

#### **Other Tech**

- Electrification
- Methanol
- Hydrogen
- Natural Gas



#### **Evolution of Fuels**

Ethanol petroleum de MTBE Ethanol ???



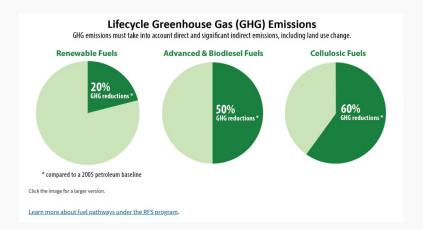




### Ultra-low Sulfur Diesel and Gasoline

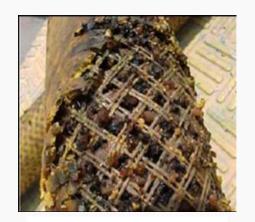
#### **ULSD Phase In Summary** Fuel 2006 2007 2008 2009 2010 2011 2012 2013 2014 80% 15 ppm & 15 15 15 15 15 Highway 20% 500 ppm ppm ppm ppm ppm 500 500 500 15 15 15 15 15 Non-Road ppm ppm ppm ppm ppm ppm ppm ppm 500 500 500 500 500 15 15 15 LM ppm ppm ppm ppm ppm ppm ppm ppm NRLM w/ 500 500 500 500 15 HS HS HS Credits ppm ppm ppm ppm ppm Notes: LM - Locomotive and Marine; ppm - parts per million Source: EPA Presentation ULSD Workshop Nov 2004

#### Renewable Fuel Standard





#### Incompatibility and Degradation Can Lead to Releases



**Delamination** 



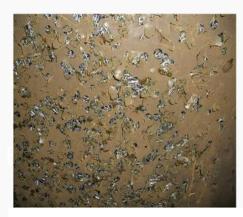
**Softening** 



Discoloration



**Swelling** 



Fiberglass Tank Walls



**Elongation ("creep")** 



#### Compatibility Requirements

UST system must be compatible with substance stored. (1988)

Biofuels (2015)
Notify
Demonstrate
Keep Records



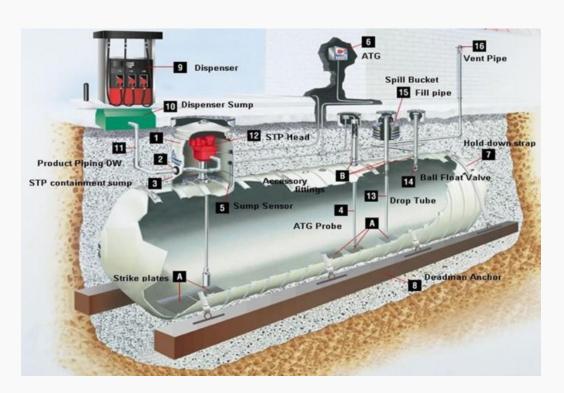
#### 40 CFR 280.32 – Compatibility (summary of 280.32 (b) and (c) only)

- **Notification** Owners and operators must **notify** the implementing agency at least 30 days before switching to a regulated substance containing greater than 10 percent ethanol, 20 percent biodiesel, or any other regulated substance identified by the implementing agency
- Meet Compatibility Requirement for a list of equipment (see next **slide)**– Owners and operators must
  - demonstrate compatibility of the UST system through a nationally recognized testing lab listing or manufacturer approval of UST equipment or components, or
  - use an alternative option identified by the implementing agency that is no less protective than demonstrating compatibility of the UST system
- **Recordkeeping** Owners and operators must maintain records for as long as the biofuel blend is stored to demonstrate compliance



## Compatibility Requirement in 280.32(b) and (c) applies to:

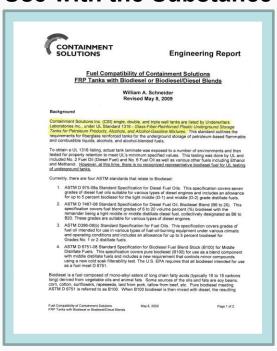
- Tanks
- Piping
- Containment sumps
- Pumping equipment
- Release detection equipment
- Spill equipment
- Overfill equipment



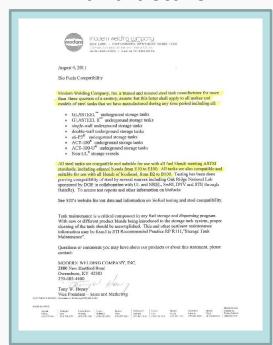


#### **Examples for Demonstrating Compatibility**

### Independent Laboratory Certification or Listing for Use with the Substance



## Affirmative Statement of Compatibility from Manufacturer





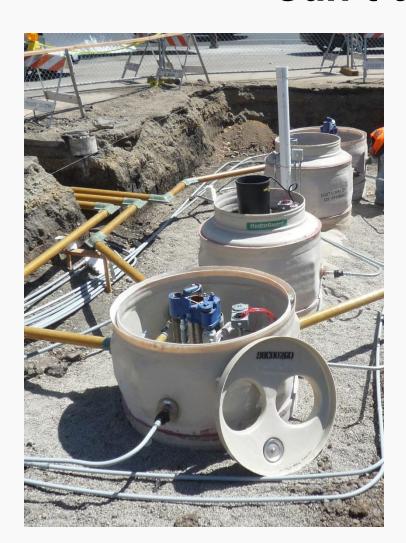
#### Aboveground Equipment







#### Can't demonstrate?



- Targeted retrofits
- Install a new system
- Don't store the substance



## E15 and Higher Blends: Few USTs Fully Compatible



~ 5000 stations

~ of 110,000 stations in US



#### E15, aka Unleaded 88







#### **Retail Locations Offering E15 – around 2022**





#### 2023: E15 sold at more than 3,000 stations in 31 states

Source: DOE Alternative Fuels Data Center, 2023





#### **Retail Locations Offering E15 – around 2025**



4,366 STATIONS

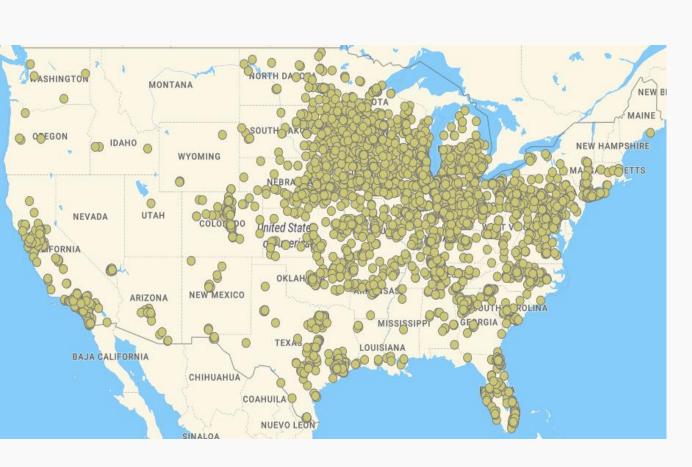


#### **Brands with E15 Today at Retail**





#### ~ 4800 Retail Locations Offer E85 – *Around 2022*



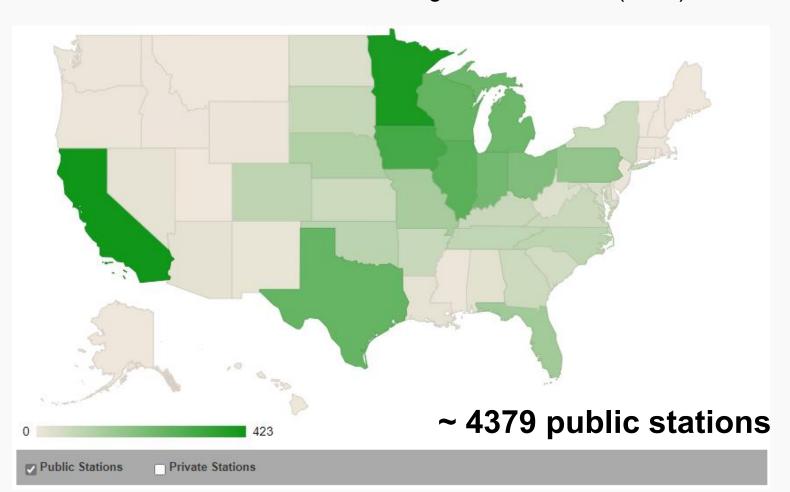
### E15 or E85 nationally

- 35% in 4 states: MN, WI, IL, IA
- 75% in 14 states



#### **Today: E85 Fueling Station Location by State**

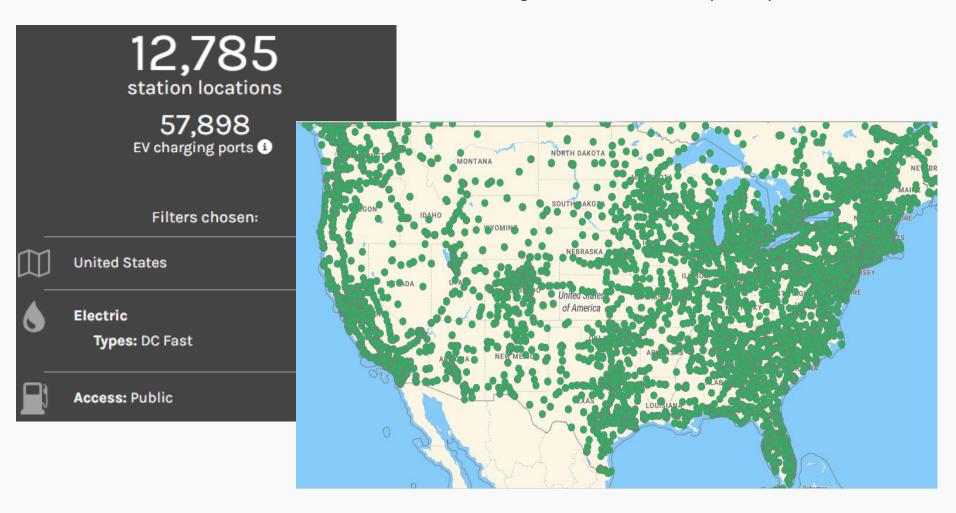
Source: DOE Alternative Fueling Station Locator (2024)





#### **DC Fast Chargers (Public)**

Source: DOE Alternative Fueling Station Locator (2025)





#### Significant Federal Funding to Upgrade Fuel Infrastructure

\$100 Million 2015 \$100 Million 2020 \$100 Million 2022 \$500 Million 2023 - 2024

#### USDA Higher Blends Infrastructure Incentive Program (HBIIP)

- USDA grant funds available to increase sale and use of higher blends of ethanol and biodiesel by expanding infrastructure for renewable fuels derived from U.S. agricultural products.
- Designed to share costs related to installing, retrofitting and/or upgrading fuel storage, dispenser pumps, related equipment and infrastructure.
- www.rd.usda.gov/hbiip

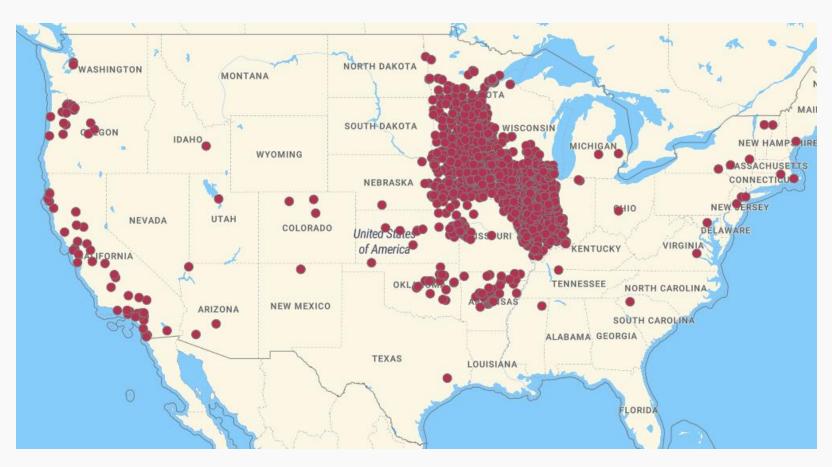


#### 2022: ~ 827 Stations w/ Biodiesel ≥ B20



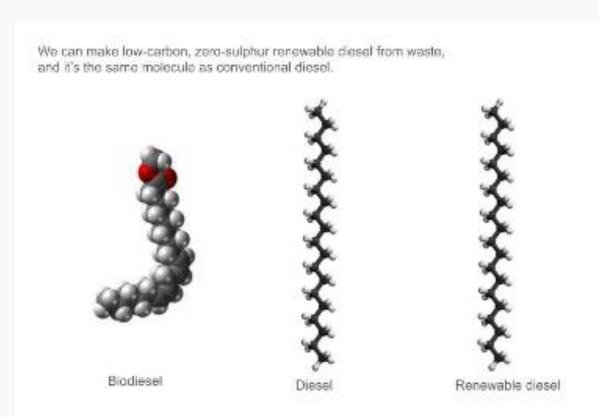


## 2024: ~ 1408 Stations Offer Biodiesel ≥ B20





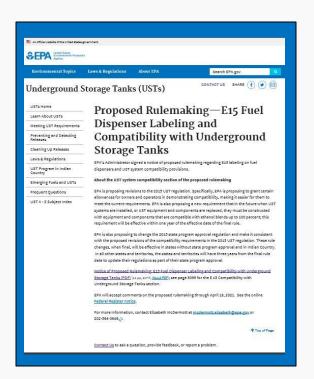
#### The Future: Renewable diesel?







# Proposed Regulation: E15 Fuel Dispenser Labeling and Compatibility with Underground Storage Tanks



- On January 15, 2021, EPA's Administrator signed a notice of proposed rulemaking: E15 Fuel Dispenser Labeling and Compatibility with Underground Storage Tanks
- Proposed to grant certain allowances for owners and operators in demonstrating compatibility.
- Proposed a new requirement that when UST systems are installed, or UST equipment and components are replaced, they must be constructed with equipment and components that are compatible with ethanol blends up to 100 percent.



#### Selected EPA OUST Compatibility Resources

#### OUST Website <a href="https://www.epa.gov/ust">https://www.epa.gov/ust</a>

- 2020 UST System Compatibility Biofuels Guide (printable, including updated compatibility checklist on pages A-2 through A-4) <a href="https://www.epa.gov/ust/ust-system-compatibility-biofuels">https://www.epa.gov/ust/ust-system-compatibility-biofuels</a>
- 2015 UST Technical Compendium (including questions on biodiesel and renewable diesel): <a href="https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulation">https://www.epa.gov/ust/underground-storage-tank-ust-technical-compendium-about-2015-ust-regulation</a>
- E15 UST Compatibility Statement: <a href="https://www.epa.gov/ust/e15-compatibility-ust-systems-statement">https://www.epa.gov/ust/e15-compatibility-ust-systems-statement</a>
- UST Compliance Advisory about Compatibility Requirements in 40 CFR 280.32: https://www.epa.gov/ust/compliance-advisories-about-2015-underground-storage-tank-regulation



#### **Questions - Discussion**

- More E15 and E85 is likely coming.
- EPA compatibility rules most facilities need equipment changes to store these fuels.
- Other/misc thoughts, issues, questions?

Tony Raia
raia.anthony@epa.gov
EPA Office of Underground Storage Tanks

https://www.epa.gov/ust/emerging-fuels-andunderground-storage-tanks-usts