



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGIC
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San Diego, California 92132-0058



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Ser N40JRR.cs/0025
December 12, 2011

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board (SWRCB)
1001 I Street, 24th Street
Sacramento, CA 95814

Subject: COMMENT LETTER – PROPOSED UST REGULATION

On behalf of Rear Admiral Smith, the Department of Defense (DOD) Regional Environmental Coordinator for EPA Region IX, and the Military Services in California, I am writing in support of the proposed regulatory action for new underground storage tank design, construction, and monitoring requirements.

As a component of meeting aggressive mandates for energy and water conservation development of renewable energy resources, and reduction of greenhouse gases, DOD uses biodiesel fuels in California. Typically these fuels are best stored in underground tanks. Independent testing has yet to be completed on the compatibility of such fuels with underground tanks, though the current regulation allows use of such alternative fuels through June 1, 2012. This proposed regulation would allow us to continue using such fuels, provided appropriate safeguards are in place.

We appreciate your efforts to accommodate our short-term needs for storage of alternative fuels. However, given the national mandates for federal agencies to increase usage of alternative fuels over the next decade and beyond (including biofuel-based aviation fuels), we recommend an ongoing collaboration to develop a similar regulatory solution for the large volumes of underground piping that serve aboveground tanks at military bulk fuel facilities.

The point of contact for this letter is Mr. Ned McKinley at ned.mckinley@usmc.mil or (760) 390-7352.

Sincerely,
A handwritten signature in black ink, appearing to read "C. L. Stathos".

C. L. STATHOS
By direction