

UNIVERSITY OF CALIFORNIA, DAVIS

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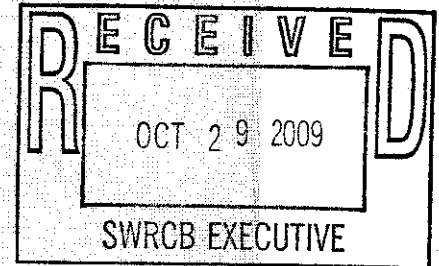
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October 29, 2009

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Comment Letter – Proposed Biodiesel UST Regulation

Dear Ms. Townsend:

The University of California, Davis Fleet Services currently dispenses B20 biodiesel exclusively from the campus fueling facility. The B20 is stored in an existing Underground Storage Tank (UST) utilizing the interim variance provided for in section 2631.2 of Chapter 16 of Title 23 of the California Code of Regulations. Absent the extension of this section, in all likelihood the University will have to discontinue use of B20 biodiesel.

This is a matter of concern as UC Davis consumes approximately 60,000 gallons of B20 biodiesel annually which directly displaces use of petroleum fuels and substantially lowers diesel related vehicle emissions in a densely populated urban area. UC Davis is located in the Sacramento Federal Nonattainment Area for PM 2.5 emissions. Additionally, the ten campuses in the University of California collectively consume almost 265,000 gallons of B20 statewide each year. UC Davis and the University of California system rely upon use of B20 in order to meet federally mandated alternative fuel vehicle requirements codified in the Energy Policy Act of 1992 (EPAct), and biodiesel is the only low carbon fuel able to be used in the existing diesel vehicle inventory. Failure to readopt section 2631.2 of Chapter 16 of Title 23 of the California Code of Regulations can be expected to have a negative impact on vehicle emissions within Federal Nonattainment Areas here and throughout the state and may also cause UC Davis and/or other UC campuses additional difficulties and expenditures in meeting federally mandated alternative fuel vehicle requirements required under EPAct. I strongly urge you to readopt the proposed interim variance.

Thank you for your consideration in this matter.

Sincerely,

Richard E. Battersby
Director, Fleet Services

RB/rb