



**DEPARTMENT OF FORESTRY AND FIRE PROTECTION
OFFICE OF THE STATE FIRE MARSHAL
FIRE ENGINEERING DIVISION**

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June 18, 2015

Jim M. Aguila
Air Resources Supervisor II
California Air Resources Board
Industrial Strategies Division
P.O. Box 2815
Sacramento, California 95812

Dear Mr. Aguila:

This letter is in response to your request on May 12, 2015, for comments on the California Renewable and Biodiesel Diesel Multimedia Evaluation Tier III Reports prepared by the University of California (UC) Davis and UC Berkeley for the California Environmental Protection Agency, Multimedia Working Group, dated April 2012 and June 2014. The California Department of Forestry and Fire Protection (CAL FIRE) – Office of the State Fire Marshal (OSFM) does not regulate pure renewable diesel or pure biodiesel within the Aboveground Petroleum Storage Act (APSA). We appreciate the opportunity to comment and have limited our comments to the authority of the Office of the State Fire Marshal.

Renewable Diesel

The OSFM believes there are no significant adverse fire and panic safety impacts based on information provided by the multimedia evaluation of renewable diesel that meets the American Society for Testing and Materials (ASTM) D975 Standard and the UC Tier III Report.

Biodiesel

Based on a relative comparison between biodiesel and California Air Resources Board (CARB) diesel, and information provided by the UC researchers, the OSFM concludes there are minimal additional risks to public safety posed by biodiesel than that posed by CARB diesel alone. The OSFM supports the multimedia evaluation of biodiesel that meets ASTM fuel specifications and the finding of no significant adverse impacts on fire and panic safety related to the authorities of the State Fire Marshal.

Since renewable diesel and biodiesel blends are subject to regulations under APSA and Spill Prevention, Control, and Countermeasure (SPCC), sufficient controls are currently in place to prevent spills and releases to the environment. It is important to note that while California does not regulate pure biodiesel within APSA, both renewable diesel and biodiesel will be required to meet Federal spill prevention, control, and countermeasure regulations. Aboveground storage tanks storing and/or dispensing renewable diesel or biodiesel, (pure or blended), in compliance with APSA and SPCC, pose no additional risk to the environment. These products will be required to comply with provisions in the California Fire Code and the local Authority Having Jurisdiction code amendments.

If you have any questions or need further information, please contact Jennifer Lorenzo at (916) 324-0232 or jennifer.lorenzo@fire.ca.gov.

Sincerely,



JAMES PARSEGIAN
Supervising Deputy State Fire Marshal
Fire Engineering Division

cc: Via E-mail
Aubrey Gonzalez, Air Resources Board
Laura Fisher, State Water Resources Control Board

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