

Comment Info: =====

General Comment: In addition to aboveground stainless steel and lined steel tanks and vessels,

fiberglass tanks and piping are used to store and handle oily water, animal fats and vegetable oils (AFVO). thus, while not mentioned in the Agency's 40 CFR Part 112 proposal, such fiberglass tanks and piping are subject to the proposed regulations. This is a serious omission and the Agency needs to include the fiberglass industry aboveground tank integrity standard FTPI 2007 -

1 "Recommended Practices for the In-service Inspections of Aboveground Atmospheric Fiberglass Reinforced Plastic (FRP) Tanks and Vessels. A hardcopy is attached to the mail-in submission made by the Institute.

Please find attached a complete copy of Institute comments on topics requested by the Agency.