

**Workgroup Meeting
August 28, 2013**



One of two McKenzie delivery trucks

***Subpart 6Cs
&
Stage I***

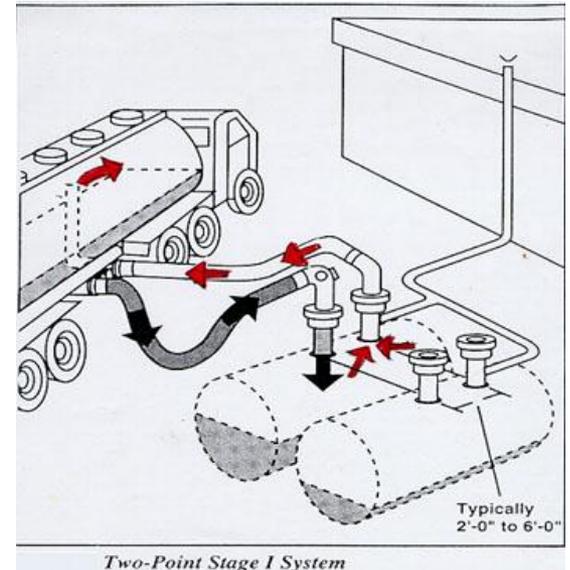
**Brief background on
Recent National Regulation
Applicable to GDFs**



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Current Stage I Requirements

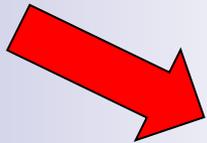
- Regulations have been in place from an Ozone-based perspective for over 20 years
- 7 Admin Code 1124
 - **Section 26**
'Gasoline Dispensing Facility Stage I Vapor Recovery'
 - **Section 27**
'Gasoline Tank Trucks'





But Many Changes Followed the **Clean Air Act Amendments of 1990**

- From an Ozone perspective
- From an air toxics perspective



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Why did EPA Adopt Sub 6Cs In 2008



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To Reduce the Risk to **Public Health**

- **Hazardous Air Pollutants**
In gasoline vapors

- Benzene
- Toluene
- Xylene
- And others



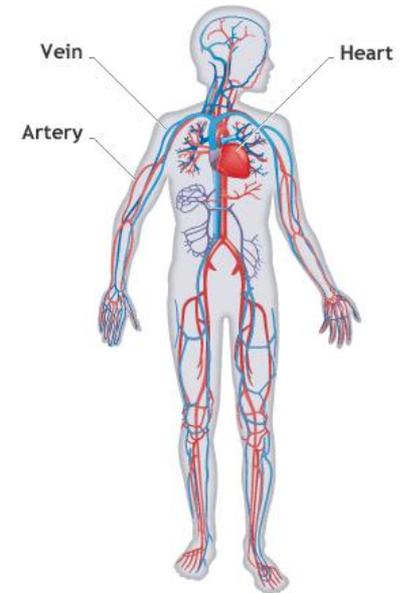
<http://www.epa.gov/ttn/atw/hlthef/hapindex.html>



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To Reduce the Risk to **Public Health**

- **Health impacts** of benzene
 - Carcinogenic Effects
 - EPA has classified benzene as known human carcinogen
 - Chronic Non-carcinogenic Effects
 - Acute non-lymphocytic leukemia
 - Damage to the immune system



www.epa.gov/ttn/atw/hlthef/benzene.html



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EPA's Area Source Air Toxics Program

- On January 10, 2008, EPA issued another area source standard
- **Gasoline Dispensing Facilities**
- 40 CFR Part 63
Subpart CCCCCC
(Sub 6Cs)



Review of Sub 6Cs



1. There are **Delaware sources**
2. There **are similar** regulatory requirements in 7 DE Admin Code 1124 Sections 26 and 27; some more and some less stringent
3. EPA **provided minimal** assistance. Notification, recordkeeping and reporting requirements were overlooked and no outreach was provided
4. The Department concluded it was **appropriate to adopt Sub 6Cs** requirements into the current **Ozone-based** requirements



To Reduce the Risk to **Public Health**

- Some of the **other National** AREA Source Standards already adopted by Delaware

- Perchloroethylene dry cleaners



- Hospital ETO sterilizers



- Animal feed manufacturers



- Auto-body repair shops





Any Questions or Comments

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