

## DE GDFs Vapor Control Regulation Revision 2013-14

Dear review committee members: Please consider the following questions. Thanks!

Your organization: **CROMPCO, LLC (Ed Kubinsky, Bob Minissale, Jen Foster)**

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First, please look through the list and determine if this question list is applicable for your organization:

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please finish the question list as much as you can, and then send it back to DAQ.

If "No," please put in your organization name in the space above and send the list back to DAQ.

Q1) About your gasoline dispensing facilities (GDF) in Delaware:

- Total number of GDFs in Delaware \_\_\_\_\_, of which
  - \_\_\_\_\_ stations are operating with a 24/7 schedule, and
  - \_\_\_\_\_ stations are operating daytime only and closed at night.
- Range of monthly throughput: \_\_\_\_\_ to \_\_\_\_\_ gal/month.

Q2) Do you currently periodically or continuously monitor tank pressure, either at a GDF in Delaware or elsewhere?

Q3) Under a no-Stage 2 configuration, for tanks that are expected to remain under negative pressure (GDFs that operate 24/7) except during a product drop, how would you propose to verify that the pressure remains negative?

Q4) Under a no-Stage 2 configuration, for tanks that are not expected to remain under negative pressure due to vapor growth, how would you propose to verify vapor tightness of the tank, and control emissions from the vent should the pressure exceed the positive cracking point of the p/v valve?

Periodic pressure decay & P/V valve testing per CARB TP 201.3 and CARB TP 201.1E

Q5) At the first review committee meeting, there was a discussion about decommissioning Stage 2 during reconstruction of a GDF.

- How do you define “reconstruction”? **Replacing 50% piping below the shear valve, installing new dispensers, replacing tanks/tank top upgrade**
- What percentage of your GDFs is typically reconstructed each year? \_\_\_\_\_
- How many reconstructions are you planning in the next two years? \_\_\_\_\_

Q6) What equipment components, either associated with the tank or the dispenser/hanging hardware, are changed out at times other than reconstruction, and what is the typical equipment life span of these components?

- Component \_\_\_\_\_ Life span (years) \_\_\_\_\_
- Component \_\_\_\_\_ Life span (years) \_\_\_\_\_
- Component \_\_\_\_\_ Life span (years) \_\_\_\_\_

(List more if needed)

Q7) What percentage of tests results in an INITIAL failure of the 10-in pressure decay test?

**>70%**

Q8) What are the most typical components that result in failure of the INITIAL 10-in pressure decay test (those components that can be easily fixed or replaced during the test)?

- Component **spill bucket drain valves** \_\_\_\_\_
- Component **overflow drop tubes** \_\_\_\_\_
- Component **fill adapters** \_\_\_\_\_
- Component **ATG caps** \_\_\_\_\_
- Component **stage I vapor adapters** \_\_\_\_\_

(List more if needed)

Q9) How often are components replaced during a pressure decay test in order to get the GDF to pass the test?

**20% of the time**

Q10) What are the most typical components that result in failure of the 10-in pressure decay test that cannot be resolved on the spot and thus results in a reportable failure?

- Component underground vapor piping leak
- Component internal dispenser vapor piping leaks
- Component \_\_\_\_\_

(List more if needed)

Q11) Have you assessed tank pressure monitoring and/or pressure management technologies, and if so, what have you found?

Q12) Do you own or operate a GDF that does NOT employ Stage 2 vapor recovery and operates 24/7? If so, would your company be willing to perform a continuous pressure monitoring test and/or an emission sampling test?

Q13) Do you own or operate a GDF that does NOT employ Stage 2 vapor recovery and closes at night? If so, would your company be willing to perform a continuous pressure monitoring test and/or an emission sampling test?

Q14) Have you reviewed the Petroleum Equipment Institute's Stage 2 decommissioning protocols, and if so, do you have any comments?

Yes, good document, helpful with decommissioning properly. Also referenced by many states for decommissioning (NH, MA, CT, ME, VA).

Q15) Existing GDF's have been required to be in compliance with the Federal requirements of 40 CFR Part 61 Subpart CCCCCC (commonly known as "Sub 6Cs") since January 10, 2011. Please identify any problems or inconsistencies that you have encountered or found over the past 2+ years when complying with the Sub 6Cs requirements compared to the existing Delaware Stage 1 requirement in the following areas:

- Complying with management practices or evaporative loss reduction requirements (for GDF owners):

Pressure decay test referenced in Sub 6C (CARB TP 201.3) is not equivalent to DE's 10" pressure decay test. DE's test causes 5 times more emissions due to testing than the 2" test. DE's test requires the test to be conducted with the P/V Valve removed from the system and is not representative of the station's actual working conditions.

- Complying with notification, recordkeeping or reporting requirements (for GDF owners):

Notification in Sub 6C requires 60-day notification of testing.

- Conducting performance testing requirements under Sub 6Cs (for Testing Service owners):

Multiple pressure decay tests must be done in order to comply with both Sub 6C and DE's regulations (must perform a 10" test and a 2" test because they are not equivalent).