

## DE GDFs Vapor Control Regulation Revision 2013-14

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

**Your organization: Two Farms, Inc. d/b/a Royal Farms**

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First, please look though 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 21, of which
  - 21 stations are operating with a 24/7 schedule, and
  - 0 stations are operating daytime only and closed at night.
- Range of monthly throughput: 75,000 to 555,000 gal/month.

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

We do not have equipment in place at any of our stations chain-wide which monitors tank pressure.

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?

Periodic testing of the pressure/vacuum vent cap.

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?

These types of emissions would be greatly reduced in a no-Stage II configuration. Vapor tightness would be verified during periodic Pressure Decay and P/V Vent Cap testing.

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 greater than 50% of piping, Tank Top Upgrade, Dispenser Replacement, and fuel system (UST) replacement
- What percentage of your GDFs is typically reconstructed each year? 10%
- How many reconstructions are you planning in the next two years? 4

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 Hanging Hardware Life span (years) 2-5
- Component Spill Basins Life span (years) 10
- Component VAC Motors Life span (years) 5
- Component P/V Vent Caps Life span (years) 3

(List more if needed)

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

5%

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 Stage II fittings under dispenser
- Component Tank Top Fittings (ATG caps, Fill adaptors)
- Component Hanging Hardware

(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? Probably around 10% 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 Corroded tank top risers (threads/pits)
- Component Below-ground Stage II piping (rare)
- Component \_\_\_\_\_

(List more if needed)

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

We have found that this equipment is extremely expensive to install and maintain. Additionally the ROI for these types of systems is completely negated with ORVR and no Stage II.

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?

Yes. We have we have stations in PA, VA and MD eastern shore. We would not be opposed to these tests, granted that operations is not affected and the tests would be at no cost.

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?

No.

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

No Comments.

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):

No major issues to report.

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

No issues to report.

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