

DE GDFs Vapor Control Regulation Revision 2013-14

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

Your organization: The Wills Group Inc./SMO Incorporated

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 49, of which
 - 35 stations are operating with a 24/7 schedule, and
 - 14 stations are operating daytime only and closed at night.
- Range of monthly throughput: n/a to n/a gal/month.

Q2) Do you currently periodically or continuously monitor tank pressure, either at a GDF in Delaware or elsewhere? **No, we do not monitor 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? **Annual testing of Vent cap and annual pressure decay of entire UST system.**

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?

Under normal operating conditions the tanks should not be under positive pressure. Testing of the UST system and the vent cap should verify proper operations.

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”? Replacement or upgrade of the entire tank top or product piping replacement or replacing the Dispensers, and of course total UST system replacement.
- What percentage of your GDFs is typically reconstructed each year? 15%
- How many reconstructions are you planning in the next two years? 4-5

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 Spill Containers Life span (years) 5 years
 - Component Nozzles Life span (years) 18 months
 - Component Vent Caps Life span (years) 3-5 years
- (List more if needed)

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

50%+

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 Loose/damaged Stage 1 adaptors
- Component Loose Fill adaptors
- Component ATG Caps
- P/V Valves
- Nozzles
- Drop Tube O-ring gasket
- Dispenser internal vapor recover piping

(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? 35%

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 Stage II Piping System-Rare
- Component Dispenser Vapor Assist motors - 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?

Yes, not economically viable, high maintenance costs, not compatible with ORVR, Obsolete

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? No

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?

I have reviewed it and find it acceptable and practicable

Q15) Existing GDF's have been required to be in compliance with the Federal requirements of 40 CFR Part 61 Subpart CCCCC (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 issues**
- Complying with notification, recordkeeping or reporting requirements (for GDF owners):
No issues
- Conducting performance testing requirements under Sub 6Cs (for Testing Service owners):
N/A