

DE GDFs Vapor Control Regulation Revision 2013-14

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

Your organization: Sunoco Inc.

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 10, of which
 - 10 stations are operating with a 24/7 schedule, and
 - 0 stations are operating daytime only and closed at night.
- Range of monthly throughput: 59,000 to 790,000 gal/month.
Sunoco also has 17 locations branded Sunoco but not owned or operated by Sunoco. Some of them do close at night but I have no access to their throughput volumes.

Q2) Do you currently periodically or continuously monitor tank pressure, either at a GDF in Delaware or elsewhere? Not currently; however, in the past we have done some monitoring studies.

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? The Pressure Vent Cap would be relied upon to keep the tank within operating specs.

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? The Pressure Vent Cap would be relied upon to keep the tank within operating specs.

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”? [Tank / piping work](#)
- What percentage of your GDFs is typically reconstructed each year? [It varies](#)
- How many reconstructions are you planning in the next two years? [In DE - None](#)

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 [Hoses/Breakaways/nozzles](#) Life span (years) [4 – 5 yrs](#)
- 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? [About 2%](#)

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 [Fill adaptor](#) _____
- Component _____
- Component _____

(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? [Infrequently](#)

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 NA
- Component _____
- 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 done some “tests” with these systems and the data was not favorable. It has been several years, but what I recall off the top of my head was that you could not easily identify a savings of fuel based on the system operating.](#)

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? [I don’t believe Sunoco has any non-Stage II locations of the 10 stations that we own/operate. However, Sunoco is willing to talk to the state about running some pressure monitoring tests.](#)

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? [I don’t believe Sunoco has any non-Stage II locations of the 10 stations that we own/operate. However, Sunoco is willing to talk to the state about running some pressure monitoring tests.](#)

Q14) Have you reviewed the Petroleum Equipment Institute’s Stage 2 decommissioning protocols, and if so, do you have any comments? [Yes we have reviewed the PEI Stage II decommissioning protocol, but we have no comments on it.](#)

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): [None that I am aware of](#)

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

[None that I am aware of](#)

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

[None that I am aware of](#)