

DE GDFs Vapor Control Regulation Revision 2013-14

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

Your organization: Wawa

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 23, of which
 - 23 stations are operating with a 24/7 schedule, and
 - 0 stations are operating daytime only and closed at night.
- Range of monthly throughput: 300,000 to 850,000 gal/month.

Q2) Do you currently periodically or continuously monitor tank pressure, either at a GDF in Delaware or elsewhere? **We have 7 sites that have a Pressure Control Units that monitor tank pressure, but we do not collect any data from them.**

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? **A simple and inexpensive, but not real technical way is to remove the fill cap to the tank and you can hear or feel the vacuum on the tank.**

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? **I do not know an inexpensive way to accomplish this.**

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 of all gas dispensers**
- What percentage of your GDFs is typically reconstructed each year? 5%
- How many reconstructions are you planning in the next two years? 6 in Delaware

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? **This question would best be answered by a UST tester, as we are only informed of a failure if the tester cannot resolve the issue.**

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 Drain valves to spill buckets
- Component Threads on the fill adapter
- Component Threads on the Stage I vapor recovery dry brake

(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? **This again would be best answered by a UST tester, but for our sites, I would say > 10%**

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 Vapor leak from a spill bucket
- 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 Permeators installed at 7 sites and we average 25 gallons/day returned**

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? **We own non-Stage II sites that operate 24/7 in MD, PA, VA, and FL.**

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? **Yes, and we have decommissioned Stage II at several sites in VA. My only comment is a recommendation that the Stage II piping beneath the dispenser should be cut and capped and all other Stage II components (e.g. vapor shear valve) should be removed.**

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 problems encountered as all of our sites have had swivel adapters and drop tubes within 6" of the bottom of the tank well before the Federal Stage I regulations.**

- Complying with notification, recordkeeping or reporting requirements (for GDF owners): **The EPA gave very little direction on notification, recordkeeping, and reporting.**
- Conducting performance testing requirements under Sub 6Cs (for Testing Service owners):