

CROMPCO Comments Regarding Stage I and Stage II Workshop

1. Crompco believes that further investigation and data collection should be done on a few different sites (both 24-hour and non-24 hour) in regards to obtaining tank pressure data over time. Our thought is that 1 month of hard data should be sufficient to review to obtain a representative sample of what is occurring with the tank pressures at the sites. This will help determine what controls need to be in place to prevent sites from going positive with their tank pressure this causing emissions out the vent valve or UST tank-top leak sources. Crompco would be willing to perform a PD & P/V Valve test at the sites to ensure the UST system is vapor-tight and the P/V Valve functions properly at the start of data collection (at no cost with committee members on site to witness PD testing if so desired).
2. Pressure decay testing:
 - a. Crompco will agree that performing the TP-96-1 (San Diego Protocol – 10” test) should be performed only at the conclusion of stage II decommissioning procedures and immediately following any excavation activities performed at the UST facility to ensure vapor tightness.
 - b. Routine in-use compliance pressure decay testing should be performed only:
 - i. After the P/V Valve(s) has been bench tested (using CARB TP 201.1E) and properly re-installed on the vent stack; and
 - ii. Using CARB TP 201.3 test procedure (2” test) – this ensures that the system is tested as in normal operating conditions and that the P/V Valve(s) are installed properly and vapor-tight along with the rest of the system.
3. Incorporate by reference PEI RP 300 chapter 14 for decommissioning procedures.
 - a. Make clear the Department’s position on whether the decommissioned stage II vapor recovery piping can remain in place connected to the UST system or if it must be disconnected, capped and isolated from the UST system upon decommissioning (if accessible in a sump or extractor fitting).
4. Remove wording in 36.7.1.2.4 that requires vac motors to be removed from the dispensers and remove wording to electrically isolate because reprogramming the dispenser decommissions the vac motors and we don’t want anyone leaving open wires in the dispensers.
 - a. Add wording that an inert gas such as nitrogen shall be used to blow out vapors from the vac motors prior to permanently capping and sealing off the vac motors and dispenser piping.
5. Change wording in 36.7.1.2.6 to “Disconnect, blow back any liquid blockages with nitrogen, and cap the Stage II vapor return piping at or below grade at each dispenser location.” Reasoning – there are instances where the dispenser may need to be removed to cap below grade which would incur additional and unnecessary costs and down-time for owners due to decommissioning. PEI RP 300 section 14.6.6 allows for capping at or below grade which we agree with. Capping the vapor shear valve or capping the piping at grade is adequately safe.
6. Crompco agrees that verification that the overfill device in each tank is operational should be performed at the time of decommissioning. Wording should include a reference to follow procedures outlined in PEI RP 1200 to perform this work.
7. Upon decommissioning, other states (MA, RI, and GA) have begun to require that CARB TP 201.1B should be performed annually on all swivel fill adapters and swivel stage I adapters along with the other annual compliance tests. Maybe the Department can look at requiring this test to be performed to ensure that the swivel adapters are not being loosened or over-tightened by the product delivery drivers. This is what can occur if the fitting does not swivel at the proper torque setting.
8. Upon decommissioning, other states (MA, RI, and GA) are also requiring that EVR-approved P/V Valves are the only P/V Valves allowed to be installed after decommissioning. These P/V Valves have the same performance characteristics as other NESHAP-approved P/V Valves; however, is there an enhancement in the EVR-approved P/V Valve which makes them better than the non-EVR-approved P/V Valves (OPW 623, HUSKY 4885, EMCO A0084) that are currently utilized? A question for the manufacturers (HUSKY 5885 and Franklin Fueling PV-ZERO are the only Stage I EVR-approved P/V Valves that must be used with stage I EVR systems per the CARB Executive Orders)
9. Add wording (not sure where): “If at any time during pressure decay testing or continuous monitoring that it has been determined that decommissioned stage II piping that is still connected to the gasoline UST system is no longer vapor tight underground, the piping shall be immediately and completely disconnected from the UST system at tank top. A follow-up pressure decay test (TP-96-1) shall be performed prior to placing the system back into use”
10. Ensure clarity that allowing of mix and match of EVR tank components is the intent of section 36.3.3.

Respectfully Submitted,

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