



Sunoco, Inc. (R&M)
Auto Lab Building
100 Green Street
Marcus Hook, PA 19061

January 9, 2014

Mr. Frank Gao
DNREC – Div. of Air Quality
715 Grantham Lane
New Castle, DE 19711

RE: Stage II Workshop Group - Comments

Dear Mr. Gao:

Sunoco appreciates the opportunity to be a part of the Stage II workshop group and has the following comments.

First and foremost, it is suggested to separate the Stage II decommissioning portion of this regulation from the Vapor Emission Control efforts that are proposed. Currently, the Department has no hard data that shows that Underground Storage Tanks (USTs) in the State of Delaware have uncontrolled emissions that are at levels which would warrant an enhanced vapor recovery system such as a continuous pressure monitoring system, which could be over \$60,000 per station to install. However, the Department does have data showing that by the end of 2018 the effects of Stage II Vapor Recovery being used by newer vehicles with Onboard Refueling Vapor Recovery (ORVR) will be negatively affecting the atmosphere. Therefore, it is Sunoco's opinion, that the group should focus on the process of decommissioning Stage II Vapor Recovery first. We believe further studies are needed to determine the extent of the issue, if any, of uncontrolled vapors.

It is suggested to allow Stage II Decommissioning if significant work is conducted at the station such as the installation of new tanks or dispensers or tank top upgrade work, which would encourage owners not to delay planned upgrade work which could lead to more environmental issues.

The Department is recommending TP-96-1 which is a 10" test instead of the TP-201.3 or 2" test for pressure decay. Currently, the vent caps have positive pressure cracking values between 2.5" and 6" and set for 3". Testing at 10" is not a "real-life" scenario plus the testing protocol does not test with the vent cap in place so your results are not ensuring a tight system. Sunoco recommends using the TP-201.3 or 2" testing procedure to ensure systems are tight in "real-life" situations.

The decommissioning process references Petroleum Equipment Institute (PEI) Recommended Practices 300-09 Chapter 14; however, the Department is requesting steps above and beyond the PEI Scope. We believe there is no real value in requiring the removal of the vacuum pump; therefore, it makes it an unnecessary extra cost. Additionally, requiring the capping of the Stage II piping on the tank end when the piping is only accessible by requiring excavation is an unnecessary and costly burden. The wording should follow PEI and only require capping of the Stage II piping at the tank end if it is accessible.

If you have any questions, please feel free to reach me at 610-859-3493.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Celeste", written over a circular scribble.

Jennifer Celeste
Manager, Product & Regulatory Support
Sunoco Marketing Performance & Compliance

Cc: File