



To: Mr. Frank Gao
DNREC- Division of Air Quality
715 Grantham Lane, New Castle, DE 19711

January 10, 2014

RE: DNREC Stage I & II GDF Committee- Comments

Mr. Gao,

UST Services appreciates the opportunity to provide comments and suggestions to the committee.

1. UST Services feels that installing and operating a Continuous Pressure Monitoring System (CPM) 36.3.2.1 needs more data to warrant the need. Currently it is unknown if positive pressures in tanks will be present, and if so, what amount of vapors will be vented into the atmosphere? We do believe the current Stage II vacuum assist systems are putting positive pressures on tank systems and causing vapors to be vented into the atmosphere. By removing the stage II vacuum assist system there will be a vapor emission reduction. We also feel that a definition of Continuous Pressure Monitoring (for a Stage I system) and acceptable methods would be needed if this system must be installed.
2. Our professional opinion is that the decommissioning procedure should follow PEI RP-300 section 14. We do not feel it is necessary to remove underground stage II piping from the tank if inaccessible at tank top. Additionally, removing vacuum assist motors is not necessary. We do agree the pressure decay TP-96-1 San Diego Protocol is a necessary post Stage II decommissioning test to ensure any remaining Stage II piping is vapor tight. However, once Stage II has been decommissioned, with passing TP-96-1 results, we do not believe the 10" pressure decay test is necessary moving forward. The CARB TP 201.3 (2" test) pressure decay would be an acceptable annual test once the decommissioning has been completed. In our experience, the TP 201.3 pressure decay simulates a better working system test due to all tank vapor system components being in place during the test, specifically the pressure vacuum vent caps.

Thank you,

Mark Devey
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