



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

July 14, 2014

Mr. Frank Gao
Delaware Department of Natural Resources & Environmental Control (DNREC)
Division of Air Quality
715 Grantham Lane
New Castle, DE 19720

RE: Review Committee Meetings for Vapor Emission Controls at Gasoline Dispensing Facilities

Dear Mr. Gao:

Sunoco Inc. (R&M) appreciates the opportunity to participate in the Review Committee for the upcoming changes to the Stage I and II Vapor Recovery for Gasoline Stations in the State of Delaware. Sunoco owns and/or operates approximately 10 locations in Delaware and we also have approximately 10 locations that are branded Sunoco and owned and/or operated by other entities including small mom and pop type dealers.

This committee has been meeting for almost a year and the Division of Air Quality has been pushing the need for an Underground Storage Tank Pressure Monitoring System from early in the process. Industry has voiced its concerns with this system and has offered alternatives; however, the Department does not seem interested. In the surrounding states of New Jersey, New York, Pennsylvania, Maryland and Virginia all but one state (New Jersey, which has not drafted any regulations) allow for either the removal of existing Stage II Vapor Recovery or do not require Stage II Vapor Recovery for new installations. None of these states are requiring a pressure monitoring system. In fact, the only state that requires a pressure monitoring system is the State of California, which also requires Stage II Vapor Recovery. The Department is planning on requiring a system that 1. Has known operational issues in cold climates (Note that the State of California allows stations to ignore alarms during the winter months); 2. Currently is only installed on stations with Stage II Vapor Recovery and 3. Has not been proven to be necessary. Sunoco feels that the Department should investigate the need for this type of system and conduct testing on the proposed system at a location within Delaware that does not have Stage II vapor recovery to determine how the system would operate under those conditions PRIOR to requiring stations to install them.

We believe that the State should be moving forward with not requiring Stage II Vapor Recovery at new locations and allowing stations undergoing construction to remove Stage II Vapor Recovery, as almost all of the surrounding states have already done. Furthermore, the removal and decommissioning of Stage II Vapor Recovery should follow the Petroleum Equipment Institute (PEI) Recommendations. The proposed requirements to add additional steps are costly for station owners and not warranted.

Sunoco appreciates the opportunity to participate in the group and 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 white background.

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