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**Sent:** Wednesday, July 30, 2014 1:24 PM  
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**Subject:** RE: Question 3 - Needs further comment.

Ellen,

The benefit of a CPM system is to ensure a station's tanks are not leaking. Based on the AP-42 emission factor for tank losses of 1#VOC/1000 gallons dispensed and 450,000,000 gallons of gasoline dispensed annually in Delaware, the savings would be 225 tons/year.

Dave

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***Blue Skies Delaware; Clean Air for Life***

**From:** Ellen Valentino [<mailto:evalentino@ellenvalentino.com>]  
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**Subject:** Question 3 - Needs further comment.

[On question three:](#)

1. What is the benefit of CPM Systems – I specifically was asking for the benefit in voc reduction per year - if you have that calculation. If you are unable to quantify – please advise. Thank you.

This is an important component of information. Thank you.

**From:** Fees, David F. (DNREC) [<mailto:David.Fees@state.de.us>]

**Sent:** Wednesday, July 30, 2014 9:15 AM

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**Subject:** RE: Clarifying Per Your Request

Ellen,

Frank Gao will be forwarding comments today that we received after the last committee meeting. These include comments from you, Jen Celeste, Josh Worth, and Seth Ross. As Frank said, we have considered all comments made by members of the review committee, and as I noted in a recent e-mail, DAQ made some significant adjustments to the draft as a result of comments made at the last meeting and subsequently e-mailed to DAQ.

Here are responses to your questions.

1. Can you please provide the calculations that pertain to when Stage II can be removed? DAQ included data in the meeting presentations on the break-even point where the incompatibility excess emissions (IEE) exceed the Stage 2 benefit. In the absence of other controls in place at GDFs, the date that we can allow Stage II to be removed and not backslide would be the end of 2018. With the proposed requirements to remain vapor tight and to limit venting through the P/V valve, DAQ is allowing Stage II to be removed on the effective date of the regulation.
2. How did you arrive at this conclusion/calculation? DAQ calculated the IEE based on a CARB study of IEE and on Delaware-specific data such as annual gasoline throughput, ORVR penetration in Delaware's vehicle fleet, and percentage of vacuum-assist Stage II systems. The incremental Stage 2 benefit was calculated using the EPA MOVES model. The break-even point is when the IEE becomes greater than the benefit of Stage II.
3. The expected benefit of requiring CPM? Data/Study. CPM will be a cost savings to GDFs. The cost of the CPM system is \$5000 or less. Since the annual pressure decay test is no longer required when a CPM is used, the payback is 5 years or less with the cost of a test averaging \$1,000. This does not include the benefit of not having to shut down dispensing during the test or the savings in retained product.

Regards,

Dave

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**Subject:** Clarifying Per Your Request

Clarification request:

I do not remember seeing any hard data from DNREC or a Cost v. Benefit analysis as to the impact of the regulation. It is possible I missed it. Specifically,

1. Can you please provide the calculations that pertain to when Stage II can be removed?
2. How did you arrive at this conclusion/calculation?
3. The expected benefit of requiring CPM? Data/Study.

**Additionally, please circulate the comments from the stakeholders ASAP. It is important to review the specifics of any changes made/ AND NOT MADE/ to the proposal based on comments from the private sector.**

Thank you. Ellen

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**Subject:** RE: Thanks and Mtg 5 Follow-up

Hi Ellen,

I have just sent out our proposal to the committee. It's been on my schedule for a few days, and I should have done this earlier (we have been busy on another SIP revision to meet EPA's deadline). Thanks for the reminder.

Regarding the "document/study/data analysis" you mentioned, I wonder if you could provide us some details or specifics. I believe that all our major study and analysis results have been provided to the committee in our 5 committee meetings or e-mail exchanges. We do have conversations and discussions with MDE, exchanging with them what we discussed in our committee. If MDE tended to reference those pieces of information all-together, I understand.

Thank you again for your interest in and support to our work.

Frank

**From:** Ellen Valentino [<mailto:evalentino@ellenvalentino.com>]  
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**Subject:** RE: Thanks and Mtg 5 Follow-up  
**Importance:** High

Frank:

Can you please circulate (to all) all the stakeholder comments and redraft as soon as possible and prior to publication?

Additionally, in a recent conversation and email exchange MDE officials continue to reference conversations and the direction of DNREC. Most importantly, they indicate that DNREC has a "document/study/data analysis" that DE's proposed regulations are based upon. This may have been referenced in prior DE stakeholder meetings but never produced.

Given the last version of the regulations and the cost implications to the private sector - it is critical that this be shared so that it can be reviewed for comment and consideration by all. The cost v. benefit rationale is likely the most important factor when moving forward with any new private sector mandate – particularly in these difficult times.

Looking forward to your response. Ellen

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**Subject:** Thanks and Mtg 5 Follow-up

Committee members,

Thank you all for participating in the meeting yesterday, and providing the committee meaningful comments and suggestions on the draft language for new DGFs.

As we explained in the meeting, we are planning to draft a proposal for new GDFs in the next two weeks and have it published in DE Register on August 1 for public comments. A hearing will be held in late August (the date of the hearing will be set up in the near future).

For publishing the proposal on August 1, we need to submit it to the register's office by 07/15. Please provide us your comments and suggestions on the draft **by 07/10** (two weeks from today) to allow us enough time to review and make relevant adjustments to the draft.

Thanks again,

Frank

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