

From: Gao, Frank F. (DNREC)
Sent: Wednesday, July 30, 2014 9:56 AM
To: Ellen Valentino; mark@wilsonbaker.com; Joshua.m.worth@wawa.com; truszin@royalfarms.com; SStookey@twgi.net; Ed.kubinsky@crompco.com; Bob.minissale@crompco.com; Jennifer.foster@crompco.com; Ross.seth@gmail.com; amywroe@gmail.com; jlceleste@sunocoinc.com; mdevey@ustservicescorp.com; jimmckelvey@verizon.net; Stephanie.herron@sierraclub.org; gpattersongallc@gmail.com; david.petersen@7-11.com; jlaschke@husky.com; sam@tr2corp.com; 'John Myers'; molina@franklinfueling.com; grant@franklinfueling.com; sam@tr2corp.com; 'Reid, Kent'; 'Brown, Jake'
Cc: Snead, James (DNREC); Amirikian, Ronald A. (DNREC); Gomes, Colin (DNREC); Postell, Tom (DNREC); Rollo, Peter (DNREC); Sunkler, John F. (DNREC); Kirkland, Barbara (DNREC); Rittberg, Alex (DNREC); Coverdale, James (DNREC); Small, David (DNREC); 'Gary Patterson'; 'Julie Mirowenger'
Subject: FW: Wawa's Comments and Suggestions on DNREC Stage II Draft Proposal

Committee members,
Below is the comments from **Josh Worth of Wawa on 06/26/2014**, on the draft language we presented in Meeting 5.

Thank you for your attention.

Frank

-----Original Message-----

From: Worth, Joshua M. [<mailto:joshua.m.worth@wawa.com>]
Sent: Tuesday, July 08, 2014 5:30 AM
To: Fees, David F. (DNREC)
Cc: Gao, Frank F. (DNREC); Amirikian, Ronald A. (DNREC); Fuel Equipment
Subject: Re: Wawa's Comments and Suggestions on DNREC Stage II Draft Proposal

Dave,

One thing I forgot to mention is that fuel equipment vendors are available 24 hours a day. Tank testers have to be scheduled and do not guarantee a response within a certain timeframe.

Thanks,

Josh Worth
Fuel Equipment & Compliance
610-558-8521

On Jul 8, 2014, at 5:27 AM, "Worth, Joshua M." <joshua.m.worth@wawa.com> wrote:

> Dave,

>

> When I reference "Fuel Equipment Repair Vendor", they are the vendors we use to make repairs to the UST System. Tank testers are not repair vendors. They can tighten a loose fitting, but the majority of them do not make actual repairs to the equipment. Fuel Equipment Repair Vendors have certifications from manufacturers to work on their equipment. Warranties are voided if someone without certification works on a piece of equipment.

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> Some states, including Maryland, only allow state certified repair vendors to make repairs to the UST System. It is similar to what the Tank Management Branch requires for tank installers in DE.

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> Thanks,

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> Josh Worth

> Fuel Equipment & Compliance

> 610-558-8521

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>

> On Jul 7, 2014, at 9:02 AM, "Fees, David F. (DNREC)" <David.Fees@state.de.us> wrote:

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>> Josh,

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>> Regarding the use of Wawa's service vendor to fix any leaks that are identified by the CPM, can you offer specific language in defining the qualifications of a service vendor?

>>

>> Thanks,

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>> Dave

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>> David F. Fees, P.E.

>> Managing Engineer

>> Emission Inventory Development Program Division of Air Quality, DNREC

>> tel. (302) 739-9402, fax (302) 739-3106

>> e-mail: david.fees@state.de.us

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>> Blue Skies Delaware; Clean Air for Life

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>> -----Original Message-----

>> From: Worth, Joshua M. [mailto:joshua.m.worth@wawa.com]

>> Sent: Thursday, June 26, 2014 6:28 PM

>> To: Gao, Frank F. (DNREC); Fees, David F. (DNREC); Amirikian, Ronald

>> A. (DNREC)

>> Cc: Fuel Equipment

>> Subject: Wawa's Comments and Suggestions on DNREC Stage II Draft

>> Proposal

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>> Frank, Dave, and Ron,

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>> Below are Wawa's general comments on the draft regulations:

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>> Wawa is apprehensive about installing and operating a technology, Continuous Pressure Monitoring System (CPM), that we have not tested first. We have many variables that could impact its compatibility within our infrastructure. We currently use an internal system to remotely monitor all tanks, probes, and sensors that would have to be modified to start collecting data on a CPM system. As a corporate policy, all hardware and software is tested before we can implement it. This is to ensure that it will work along side our Point of Sale system, Operations Command Center, and Central Station.

>>

>> We feel that DNREC DAQ should try to use their leverage to get Veeder-root and Franklin Fueling to supply units for testing before they are incorporated into the regulations. Though both manufacturers gave presentations, I am not sure if they are willing to supply CPM systems for free. There are only 7 new Gasoline Dispensing Facilities built a year on average in the state of Delaware, so there is not a significant market. I doubt that there is much incentive for them.

>>

>> Wawa would be willing to test a unit out for free, but DAQ would need to have the Tank Management Branch on board. We cannot install any component of a UST System until it is approved by Peter Rollo. This is a long and painstaking process and we would need to submit drawings and cut sheets for the CPM. I know your department wants to move forward quickly, so this could slow down progress.

>>

>> We are pleased with the possibility of DNREC convincing the EPA to waive the Federal Stage I Pressure Decay Test requirement at a site that operates a CPM. This would alleviate a negative impact on our business as a site would not have to shutdown for a PD test.

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>> The revision of the Drip Less Nozzle and Low Permeation Hose requirements to "Reserved" made sense, since there are currently no CARB approvals for conventional equipment. Wawa is still extremely concerned about the Drip Less Nozzle. The Interlock System that prevents "spitting" will cause our customers to fuel at other sites that do not have them. Even if DE required them at all GDFs in the state, business could be impacted by customers going to other states to refuel.

>>

>> We appreciate the opportunity to participate in the stakeholders' meetings and a chance to submit our feedback to the DAQ. We look forward to continue working with you on the Stage II Regulations.

>>

>> Thanks,

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>> Josh Worth

>> Fuel Equipment & Compliance

>> 610-558-8521

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>> On Jun 26, 2014, at 9:55 AM, "Gao, Frank F. (DNREC)"

<Frank.Gao@state.de.us<mailto:Frank.Gao@state.de.us>> wrote:

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>> Committee members,

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

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>> 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).

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>> 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.

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>> Thanks again,

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>> Frank

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