

# Review Committee Meeting June 12, 2019

## *Division of Air Quality*



Amendments to  
Air Regulation 1124  
Sections 26 and 36

*Blue Skies Delaware; Clean Air for Life*

# Agenda

- ❑ **Summary of the first review committee meeting on 05/08**
- ❑ **Discussion on identified issues and solutions**
- ❑ **Monitoring and testing topics**
- ❑ **Amendments to Section 26**
- ❑ **Next steps**



## ***Amendments to Sections 26/36***

- ❑ **Goal: To control gasoline vapor emissions at GDFs;**
- ❑ **Proposals and solutions:**
  - 1. How to handle Stage II-ORVR incompatibility?**

Decommission Stage II.
  - 2. How to ensure USTs to be vapor-tight?**

Install Stage I EVR.
  - 3. Stage I EVR requirements**

Discussion



# 1. To solve Stage II-ORVR incompatibility:

- For new GDFs:
  - Not to install Stage II
- For existing GDFs:
  - To decommission Stage II
  - DAQ considers: All GDFs by 12/31/2021



## New GDFs: No Stage II system

### □ Draft language:

- 36.1.4.1 On or after ( XX-XX-XXXX), any new facility that first commences construction, .....shall comply with subsection 36.4.
- 36.4 Standards for Facilities with Stage I Vapor Recovery Systems



# Existing GDFs: Decommission Stage II

## □ Draft language:

- 36.1.4.2 Any existing GDF, which has a Stage II vapor recovery system in operation or under construction, shall decommission its Stage II vapor recovery system before December 31, 2021.



## 2. To ensure USTs to be vapor-tight:

- Install Stage I EVR;
- For new GDFs:
  - At construction
- For existing GDFs:
  - DAQ considers: In two phases
  - Big facilities (>100K gal/m) by 12/31/2023
  - Small facilities (<100K gal/m) by 12/31/2025



## New GDFs: Install Stage I EVR at construction

### □ Draft language:

- 36.4.1.1 Any new facility that commences construction shall install its Stage I EVR system at construction and shall start operation of the Stage I system when the facility commences the gasoline dispensing operation.





# Existing GDFs: Install Stage I EVR in two phases

## □ Draft language

- 36.4.1.2 Any existing facility that decommissions its Stage II vapor recovery system shall install and operate its Stage I EVR system according to the following schedule:
  - 36.4.1.2.1 If its monthly throughput is equal to or greater than 100,000 gallons, by December 31, 2023.
  - 36.4.1.2.1 If its monthly throughput is less than 100,000 gallons, by December 31, 2025.



### 3. Stage I EVR requirements:

- DAQ considers: All GDFs to install and operate
  - One complete EVR system specified in one CARB EO
  - No mix-match between EOs
- Install, maintain and repair EVR system
  - By contractor certified by manufacturer of the installed system



# Proposed approach

## □ Draft language

- 36.4.1 The owner or operator of any gasoline dispensing facility identified in subsection 36.1.4.1 shall install and operate one of the Stage I enhanced vapor recovery (EVR) systems identified in subsection 36.10.2.
  
- 36.4.1.3 The Stage I EVR system shall be installed, maintained and repaired by contractor or contractors trained and certified by the EVR system manufacturer of the selected system.



# ■ Discussion on monitoring and testing

## 1. CPM remains as an option

### □ Draft language

- 36.1.4.1 On or after (xx/xx/xxxx), any new facility that first commences construction, or any existing facility that decommissions its Stage II vapor recovery system, shall comply with subsection 36.4, and subsection 36.5 or subsection 36.6, and ...
- 36.5 Monitoring Requirements for Facilities with Continuous Pressure Monitoring Systems



## ■ Discussion on monitoring and testing

### 2. Pressure decay (PD)

- “Cold” condition will remain;
- Failure will trigger two (2) quarterly PD retesting;
- Draft language
  - 36.6.2.1 If the pressure decay test fails, necessary repair and retesting shall be performed, then quarterly testing shall be required, and the original annual testing schedule shall resume upon passing of two (2) consecutive quarterly tests.



## ■ Discussion on monitoring and testing

### 3. P/V valve test:

- **Fail:** Install a new P/V valve, and no quarterly retest;
- **Pass:** Reinstall it, and retest it with the next PD test;

### □ Draft language

- 36.6.2.2 If the P/V valve fails the test, the valve shall be replaced with a new valve, and the new valve must be tested, as specified in subsection 36.4.2.3, before installation. If the P/V valve passes the test, the valve shall be reinstalled and tested with the next pressure decay test.



## ■ Discussion on monitoring and testing

### 4. Require Testing contractor to correct deficiencies;

#### □ Draft language

- 36.8.5 A testing company shall correct any testing deficiency, including lack of any training, tool, equipment, material or personnel that is necessary for performing any compliance test correctly and completely, within 60 days after the deficiency finding. Failure to meet this 60-day correction requirement shall lead to termination of the company's qualification for performing testing work related to this version of Section 36.0 of in Delaware.



## ■ Amendments to Section 26 (Stage I):

### 1. To establish connection between Section 26 with Section 36.

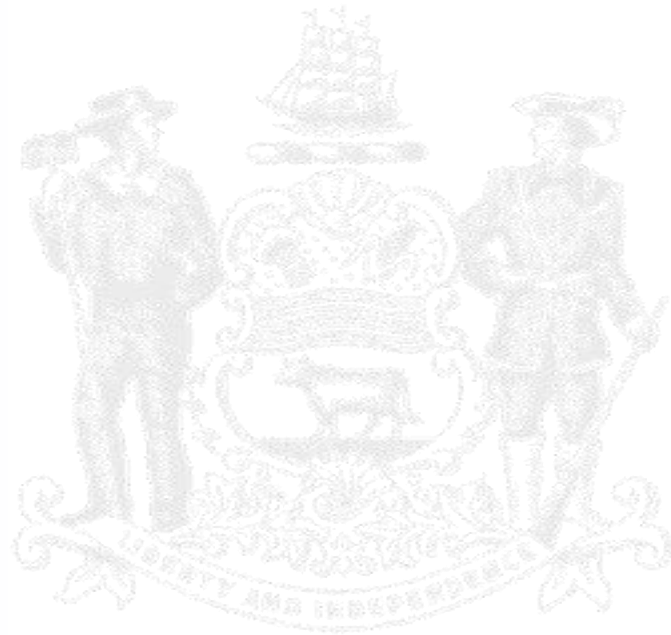
#### □ Draft language:

- 26.3.1.2 Design, install, operate, and maintain a Stage I Vapor Recovery System that is required in Section 36.0 of 7 DE Admin Code 1124 and operates such that the vapors displaced by the liquid gasoline are returned to the delivery vessel and transported back to the bulk plant or terminal.





## ■ Questions?



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## Next steps:

- ❑ **Summary of this meeting will be emailed by June 19;**
- ❑ **Send your comments via emails by July 3 to:**  
**DNREC\_1124\_Regulations@Delaware.gov**
- ❑ **Third review committee meeting:**
  - July 17, 2019, 10 am-12 noon at
  - Location: DAQ Office, 715 Grantham Lane, New castle
- ❑ **Draft language to committee for review:**
  - By July 10, 2019.

**For more information:**

<https://dnrec.alpha.delaware.gov/air/permitting/under-development/>



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