

Revision to 7 DE Admin Code 1124 Sections 26 (Stage I) and 36 (Stage II)
2019-06-12 Review Committee Meeting

Committee Meeting Summary

1. List of attendants (Attachment 1)

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|--------------------|--------------------------------|--|
| Sandy Carl, | Crompco, | Sandra.Carl@crompco.com |
| Ed Kubinsky | Crompco, | Ed.kubinsky@crompco.com |
| Tom Ruszin, | Royal Farms, | truszin@royalfarms.com |
| Kirk McCauley, | WMDA/CAR, | kmccauley@wmda.net |
| Ellen Valentino | Mid-Atl. Petro. Distr. Assoc., | Ellen@mapda.com |
| Josh Worth, | Wawa, | joshua.m.worth@wawa.com |
| Celine Bibonne | Wawa, | Celine.Bibonne@wawa.com |
| Steve Stookey, | Southern MD Oil, | SStookey@twgi.net |
| Mark Baker, | Baker Petroleum, | Mark@wilsonbaker.com |
| Bill Logue, | Tanknology | wlogue@tanknology.com (Called in) |
| Richard Negrete, | GPM Investments, | rnegrete@gpminvestments.com (Called in) |
| Frank Gao, | DAQ-DNREC, | Frank.Gao@delaware.gov |
| Jim Coverdale, | DAQ-DNREC, | James.Coverdale@delaware.gov |
| Mallory Pinkowski, | DAQ-DNREC, | Mallory.Pinkowski@delaware.gov |
| Pete Rollo, | TMS-DNREC, | Peter.Rollo@delaware.gov |
| Eileen Butler, | TMS-DNREC, | Eileen.Butler@delaware.gov |

2. DAQ presentation

- DAQ presentation attached (Attachment 2)

3. Discussions and results

In summary, agreements were reached on the following:

- 1) All GDFs will decommission their Stage II systems by 12/31/2021.
- 2) GDF with monthly throughput >100K gal/month will install Stage I EVR systems by 12/31/2023.
- 3) GDF with monthly throughput <100K gal/month will install Stage I EVR system by 12/31/2025.
- 4) Continuous pressure monitoring (CPM) will be kept as an option for testing and monitoring.
- 5) Annual pressure decay (PD) test and P/V valve test at “cold” condition will be required for non-CPM stations.
- 6) If the annual PD test fails, two quarterly PD tests will be required.
- 7) If P/V valve fails the test, replacement is required, but the failure will not trigger quarterly PD test.
- 8) Proposed amendments to Section 26 (Slide 16) is adequate.

Regarding 2) and 3) above (Slide 9), Mark Baker of Baker Petroleum suggested that DAQ define clearly the monthly throughput to determine the EVR installation schedule since the monthly throughputs of some GDFs may vary to some extent during the year. DAQ proposed, and the committee agreed, that using the average monthly throughput over the 12-month prior to the permit application be a practical solution.

Regarding the proposed requirement for testing contractor to correct deficiencies (Slide 15), the committee agreed on adding "installation contractor," as suggested by Sandy Carl of Crompco.

The committee had an extensive discussion on EVR component mix-match between CARB executive orders.

- 1) In general, the industry representatives requested the mix-match approach currently adopted in some other OTR states.
 - a. Bill Logue of Tanknology claimed some situations where using components certified in other CARB executive orders may be economically and practically favored, such as using a spare spill bucket in a timely replacement. Josh Worth of Wawa stated a situation where a problematic overfill valve of product drop tube forced them to replace the drop tube of another brand. Ellen Valentino commented that DAQ should (1) collect information for this issue from other states, (2) collect information to show reasons of why the mix-match approach did not work, and (3) consider that not allowing the mix-match may lead to price increase by a single product source (manufacturer).
 - b. DAQ informed the committee that it was aware of the situation in some OTR states (NJ, MA, and RI). Regarding Ellen's second comment, Pete Rollo of TMS stated that a mix-match EVR system would not guarantee the 98% control efficiency. DAQ showed the committee a letter from OPW (to Pete on 06/05/2019), stating that "if products other than those listed on the Executive Order are used, 98% efficiency performance cannot be guaranteed." (See Attachment 3). DAQ informed the committee, upon request, CARB stated that no testing had been done on an EVR system consist of components from different CARB executive orders.
 - c. The committee decided to have more discussion after the meeting via emails.

4. Action items

- DAQ will provide the committee a summary of this meeting by June 19.
- DAQ and TMS will further research on the EVR component mix-match issue.
- Committee members will provide the committee additional information if found.
- DAQ will provide the committee the draft languages of Section 26 and Section 36 by July 10 (one week before the next committee meeting).

5. Next step

- The third committee meeting is scheduled on July 17 from 10 am to 12 noon, at DAQ Conference Room, 715 Grantham Lane, New Castle, DE 19720.

Attachment 1: 06/12/2019 review committee meeting signed-in sheet.

Attachment 2: DAQ presentation.

Attachment 3: OPW letter to Pete Rollo of TMS on 06/05/2019.