

Review Committee Meeting July 17, 2019

Division of Air Quality



Amendments to
Air Regulation 1124
Sections 26 and 36

Blue Skies Delaware; Clean Air for Life

Agenda

- **Discussion on issues identified at the 06/12 committee meeting**
 1. **Stage I EVR installation schedule**
 2. **Correction of language for deficiency in testing and installing**
 3. **Stage I EVR component mix-match**



1. Schedule for installation of Stage I EVR

- **For new GDFs:**
 - Schedule: At construction
- **For existing GDFs:**
Schedule:
 - Big facilities ($\geq 100\text{K gal/m}$) by 12/31/2023
 - Small facilities ($< 100\text{K gal/m}$) by 12/31/2025
- **Issue discussed:** To clarify monthly throughput



To clarify monthly throughput: Revised draft

- 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, based on its monthly throughput averaged in the 12 consecutive months prior to xx/xx/xxxx (i.e., the effective date of Section 36.0):
 - 36.4.1.2.1 By December 31, 2023, if its averaged monthly throughput is equal to or greater than 100,000 gallons.
 - 36.4.1.2.2 By December 31, 2025, if its averaged monthly throughput is less than 100,000 gallons.]



2. Correct language for deficiencies

- 36.8.5 Any testing company or installation company shall correct any testing or installing 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.

We decided to delete this newly added provision. Requirements for the test protocol and test contractor are currently specified in subsections 36.3, 36.4 and 36.5.



3. Stage I EVR requirements:

- The Review Committee came to a consensus on installing EVR systems in the last meeting
- DAQ considers
 - To install one complete EVR system with 98% efficiency, specified in one CARB Executive Order.
 - To continue to investigate component mix-match.



DAQ considers requiring installation of one complete EVR system

- Guarantee 98% efficiency;
- Potential cost saving to GDF owners
 - Fewer test failures and less re-test costs
 - Less closure time



DAQ continues investigation of component mix-match

- DAQ requests that industry provide:
 - Cost savings from mix-matching parts
 - List of compatible parts between CARB EOs
- How about mix-match for after-installation repairs (only using compatible parts specified in CARB EOs)?



Next steps:

- ❑ Summary of this meeting will be emailed soon;
- ❑ Send your comments via emails by August 7 to:
DNREC_1124_Regulations@Delaware.gov

DAQ plans the fourth committee meeting:

- August 21, 2019: Grantham Lane, DAQ
- Draft languages for review before the meeting

For more information:

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



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