

2019-07-17 Review Committee Meeting

Committee Meeting Summary

1. List of attendants (Attachment 1)

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|--------------------|-------------------|--|
| Tom Ruszin, | Royal Farms, | truszin@royalfarms.com |
| Sandy Carl, | Crompco, | Sandra.Carl@crompco.com |
| Josh Worth, | Wawa, | joshua.m.worth@wawa.com |
| Celine Bibonne, | Wawa, | Celine.Bibonne@wawa.com |
| Steve Stookey, | Southern MD Oil, | SStookey@twgi.net |
| Jeff Kingsbury, | UST Service Corp, | Jeff.Kinigsbury@ustservicescorp.com |
| Mark Baker, | Baker Petroleum, | Mark@wilsonbaker.com |
| Frank Gao, | DAQ-DNREC, | Frank.Gao@delaware.gov |
| Jim Coverdale, | DAQ-DNREC, | James.Coverdale@delaware.gov |
| Renaë Held, | DAQ-DNREC, | Renaë.Held@delaware.gov |
| Valerie Gray, | DAQ-DNREC, | Valerie.Gray@delaware.gov |
| Mallory Pinkowski, | DAQ-DNREC, | Mallory.Pinkowski@delaware.gov |
| Barbara Fawcett, | TMS-DNREC, | Barbara.Fawcett@delaware.gov |
| Pete Rollo, | TMS-DNREC, | Peter.Rollo@delaware.gov |
| Eileen Butler, | TMS-DNREC, | Eileen.Butler@delaware.gov |
| Michael Moyer, | TMS-DNREC, | Michael.Moyer@delaware.gov |

2. DAQ presentation (Attachment 2)

3. Discussions and results

- 1) The Stage I EVR installation dates, previously discussed on June 12, 2019, were presented (Slide 3 of Attachment 2). Josh W. of Wawa expressed his concern from the perspective of big facilities, stating that the 12/31/2023 deadline would present a challenge for Wawa, even though it would provide about a 4-year period for compliance.
- 2) DAQ's clarification for the GDFs' monthly throughputs (Slide 4 of Attachment 2) were discussed and accepted by the committee members in the meeting.
- 3) DAQ explained the deletion of the proposed subsection 36.8.5 (Slide 5 of Attachment 2). The committee members in the meeting concurred with the deletion of the language.
- 4) The committee members discussed details regarding the Stage I EVR installation and component mix-match.
 - DAQ described information from other states (MA and NJ), CARB, and EVR manufacturer, including state regulation and CARB EVR certification protocol, that did not support a mix-match EVR system and could not guarantee the system with a 98% control efficiency. Therefore, the

requirement for installing a complete EVR system specified in the current Section 36 should remain (Slide 6 of Attachment 2).

- DAQ also explained its belief that installing a complete EVR system would lead to potential cost savings from fewer test failures and less shut-down times (Slide 7 of Attachment 2), based on its field observations in the past two years.
- DAQ explained that it understood that mix-match parts may lead to cost savings from part purchases. DAQ asked the committee members from the industry to provide data, from their field experiences, on cost savings from mix-matching parts, and a list of compatible parts between CARB EOs (Slide 8 of Attachment 2).
- The committee members from the industry explained that (1) cost savings from mix-match EVR parts would be minimum, (2) the major cost saving would be from using a correct or compatible spill bucket at the time of EVR installation to avoid multi-time breaking of concrete pad, and (3) therefore the industry would need more time for planning and budgeting the EVR installation.
- TMS stated, from its field experience, that the average lifespan of a spill bucket would be 6 years, with a possible maximum of 8 years. The committee members agreed with this statement.
- DAQ explained that, due to DE's attainment and maintenance needs for the 2015 federal standard of the ozone air quality, it would not accept an EVR installation deadline later than 2025.
- Josh W. of Wawa suggested that the EVR installation deadline for big facilities (Slide 4 of Attachment 2) be extended to 12/31/2025, the same date for smaller facilities. He stated that the extended deadline would provide Wawa a 6-year period, instead of 4 years, to deal with the challenge he mentioned earlier (Item 1 above), which would help his company and other GDFs by giving them more time to break concrete only once.
- Other committee members from the industry in the meeting agreed with Josh's suggestion. Steve S. of Southern MD Oil further suggested that DAQ seek comments from committee members of small facilities and representatives of GDF associations. DAQ agreed.
- The committee members in the meeting reached a consensus that the revision of Section 36 would include: (1) all GDFs would be required to install and operate a complete Stage I EVR system, (2) the installation deadline would be 12/31/2025 for all DGFs (i.e., no difference between small and big GDFs, and the schedule on Slide 3 for existing DGFs and clarification on Slide 4 of Attachment 2 would be void), (3) mix-matching components would not be allowed (i.e., the current requirement in Section 36 would stay the same).

4. Action items and next step

- DAQ will provide the committee a summary of this meeting in the week of 07/22.

- DAQ asks all committee members to provide the committee any comments or information by August 7 (3 weeks after this meeting).
- The fourth committee meeting will be held on August 21, 2019, in DAQ Office at 715 Grantham Lane, New Castle.
- DAQ will provide the committee the draft language for Sections 26 and 36 by August 14 (one week before the fourth committee meeting).