

2019-08-21 Review Committee Meeting

Committee Meeting Summary

1. List of attendants (Attachment 1)

Sandy Carl,	Crompco,	Sandra.Carl@crompco.com
Josh Worth,	Wawa,	joshua.m.worth@wawa.com
Mark Baker,	Baker Petroleum,	Mark@wilsonbaker.com
Richard Negrete,	GPM Investments,	rnegrete@gpminvestments.com
Glenn D'Antuono,	Speedway LLC,	gdantuono@speedway.com
Travis Walls,	Delmarva Petro. Serv.	Twalls@delmarvaPetroleumService.com
Bill Logue,	Tanknology,	wlogue@tanknology.com (Called in)
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
Mike Moyer,	TMS-DNREC,	Michael.Moyer@delaware.gov

2. DAQ presentation (Attachment 2)

3. Discussions and results

- 1) Josh W. of Wawa provided to the committee Wawa's results of testing on the integrity of more than 6,000 spill buckets. The results showed a very small number of the buckets failed the test. Since most of those buckets are more than 8 years old, Josh stated that he disagreed with the 8-year maximum lifespan discussed in the last committee meeting. TMS commented that the life of a spill bucket would heavily depend on the surrounding natural condition and working conditions, and the lifespan that TMS mentioned in the last committee meeting was based on TMS' field experience in Delaware. TMS further commented that some of Wawa's buckets are Stage I EVR models and Wawa could keep them when installing Stage I EVR systems.
- 2) Bill L. of Tanknology and Sandy C. of Crompco asked for clarifications for annual maintenance tests on Stage I EVR systems. Bill L. explained that the annual pressure decay test would be necessary for demonstrating vapor tightness of the UST system at the time of testing, but the Stage I EVR components would need to be tested also for integrity to guarantee the 98% control efficiency, as required in CARB's executive orders (EOs). Sandy C. added that the testing companies

and the station owners/operators would need to know what components of the EVR system need to be tested and included in the test records and reports.

DAQ responded that subsections 36.4.1 and 36.4.1.3 of the draft language were intended to cover Stage I EVR maintenance requirements. DAQ, however, agreed with Bill L. and Sandy C. that necessary clarifications would be needed. DAQ told the committee that after the meeting it will get to the maintenance details of CARB EOs and add adequate provisions in the draft language. Bill L. told the committee that he would send DAQ some relevant EOs' excerpts after the meeting (which he did after the meeting).

- 3) As requested by Mark B. of Baker Petroleum, DAQ and the committee discussed the algorithm of Continuous Pressure Monitoring (CPM) function in monitoring UST ullage pressure (Slide 9, Attachment 2). Renae H., the acting manager of DAQ Airshed Planning and Inventory Program, also reported to the committee that DAQ is still in discussion with EPA regarding using the CPM in DE as an alternative testing method under the federal 40 CFR Part 63 Subpart CCCCC (Slide 14).
- 4) Other issues discussed in the meeting:
 - Bill L. discussed the nozzle flow rate test requirement and requested clarification. DAQ decided to specify this requirement in 36.1.3.
 - Richard N. of GPM Investments asked DAQ to clarify the timing for the next P/V valve test in subsection 36.6.2.2 (Slide 12). DAQ agreed to clarify the language, and proposed to modify the language as follows: "...with the next quarterly or annual pressure decay test, whichever comes first."
 - The committee reviewed the draft language of Section 26, and reached a consensus that no change would be needed in the draft language.

4. Action items and next step (Slide 16, Attachment 2)

- DAQ will provide the committee a summary of this meeting in the week of 08/26.
- DAQ asks all committee members to provide the committee any further comments or information by 09/11 (3 weeks after this meeting).
- DAQ plans to hold two public workshops in the mid-October. The draft language of Sections 26 and 36, edited based on this committee meeting, will be distributed to the committee and the public prior to the workshops. Major edits will include clarification of EVR component testing requirements, clarification of the required flow rate test, revising of the language for the retesting of P/V value, etc.