



Review Committee Meeting 3

DAQ-DNREC Revisions to Regulation 1124 Sections 26 and 36

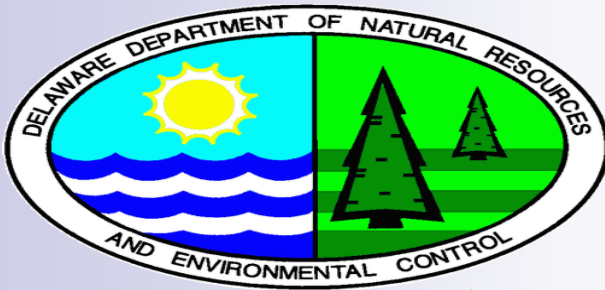
July 17, 2019. 10 AM, 715 Grantham Lane, New Castle, DE

Sign-in

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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/>



Blue Skies Delaware; Clean Air for Life

2019-07-17 Review Committee Meeting

Committee Meeting Summary

1. List of attendants (Attachment 1)

Tom Ruszin,	Royal Farms,	truszin@royalfarms.com
Sandy Carl,	Crompco,	Sandra.Carl@crompco.com
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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).