

January 10, 2020

To: DNREC Division of Air Quality

From: Sandra Carl  
Manager, Environmental Compliance  
Crompco LLC  
1815 Gallagher Road  
Plymouth Meeting, PA 19462

Re: Docket #2019-R-A-0025  
Comments to proposed new Air Regulations 7 DE Admin Code 1124; Section 26

My name is Sandra Carl, Compliance Manager at Crompco LLC. I have worked in the fuel industry for 36 years with 20 years of experience in the UST Compliance area. I want to first say thank you to Mr. Frank Gao and Mr. Jim Coverdale for organizing the Review Committee. It was a pleasure to be a part of a very important regulation change with other individuals in the industry. These changes are very important to the State of Delaware and the public and to the owner/operator of a fuel dispensing facility.

What I am very disappointed in was that DNREC did not incorporate the full scope of testing that would need to be completed once a facility has decommissioned its Stage 2 (Phase II) System. The Stage 1 (Phase 1) vapor system is required to be tested at the time of installation of the Stage 1 EVR system for the Pressure Relief Valve, Pressure Decay and the Vapor Tie, but there is no mention that the Static Torque Test must be performed. These same tests must be performed at periodic frequencies as per the manufacturer's recommendation, but DNREC has only incorporated by reference this testing.

Bill Logue, of Tanknology, raised the concern at the Committee Meeting of August 21, 2019 and Crompco also agrees, that the annual maintenance testing of the Phase 1 components, need to be included in the revisions to Section 26 so that all owner/operators of a dispensing facility will know what is required to be tested and the frequency of the testing.

Speaking from all my years of experience in working with various owner/operators, not everyone is familiar with how to read and interpret the DNREC UST/Air regulations, so the owner/operator is relying on Crompco, or their preferred contractor, to perform the required testing necessary for their facility. Owner/Operators will ask Crompco to advise them of the necessary testing and where in the DNREC regulations it states the testing frequency on their equipment. Without having the information in the regulations, it will be very difficult and challenging to advise the individual that the testing frequency of the necessary components is not listed in the DNREC regulations, but rather is incorporated and that they would find the information in the manufacturer's installation records for their specific type of system. Most of the time, the operators do not know the type of system that is installed.

Crompco believes that if the information was directly added to Section 26, similar to what I presented at the October 15, 2019 public workshop, which was "Table 3A Testing for Gasoline Dispensing Facilities"

(also attached hereto) as published by NJDEP Air Pollution Control Act, N.J.S.A. 26:2C-8, it would clearly instruct all owner/operators of what is required to be tested and the frequency of the testing. By providing this information, it will assure that all owner/operators of a dispensing facility will follow the DNREC air regulations and alleviate missed testing. Also, by clearly identifying the requirements, it will allow the owner/operators to budget properly, from one year to the next, the dollars being spent on testing.

Therefore, Crompco is requesting that DNREC please reconsider adding or incorporating this very important testing information so that it is clear to all owner/operators of a fuel dispensing system.

Thank you for your consideration.

9. Upon the request of the Department, the owner or operator of a gasoline dispensing facility shall provide the testing documentation and results required pursuant to (j)9 above and (t) below to the Department, either at the facility or to the Department's offices, as specified by the Department; and
10. Upon the request of the Department, the owner or operator of a gasoline dispensing facility shall demonstrate the efficiency of the facility's vapor recovery system in reducing the total applicable VOC emissions released from the facility into the outdoor atmosphere, as required pursuant to (d)1 and/or (f)1 above, in accordance with test procedures or documentation approved by the Department.

Table 3A  
Testing for Gasoline Dispensing Facilities

<u>Test</u>	<u>Applicability</u>	<u>Testing Schedule</u>	<u>Test Method</u>
Static Pressure Performance Test	Applies to any facility required to have a vapor recovery system under (d) above or that decommissions a vapor recovery system under (h) above	Within 90 days from the date of installation of the system, at least once in every 12-month period thereafter, and as part of decommissioning	CARB TP-201.3* for underground storage tanks and CARB TP-206.3B for aboveground storage tanks, as applicable, including all subsequent revisions thereto, which are incorporated herein by reference
Pressure Vacuum Vent Valve Test	Applies to any facility required to have a vapor recovery system under (d) above or that decommissions a vapor recovery system under (h) above	Within 90 days from the date of installation of the system, at least once in every 12-month period thereafter, and as part of decommissioning	CARB TP-201.1E, including all subsequent revisions thereto, which are incorporated herein by reference
Dynamic Backpressure Performance Test	Applies to any facility that has a Phase II vapor recovery system under (f) above	Within 90 days from the date of installation of the system and at least once in every 36-month period thereafter	CARB TP-201.4, including all subsequent revisions thereto, which are incorporated herein by reference
Air to Liquid Volume Ratio Test	Applies to any facility that has a Phase II vacuum assist vapor recovery system under (f) above	Within 90 days from the date of installation of the system and at least once in every 36-month period thereafter	CARB TP-201.5, including all subsequent revisions thereto, which are incorporated herein by reference

Torque Test	Applies to any facility that has rotatable adapters under (d) above	Within 90 days from the date of installation of the system and at least once in every 12-month period thereafter	CARB TP-201.1B, including all subsequent revisions thereto, which are incorporated herein by reference
Tie-Tank Test	Applies to any facility that decommissions a Phase II vapor recovery system under (h) above	As part of decommissioning	CARB TP-201.3C, including all subsequent revisions thereto, which are incorporated herein by reference

\*In CARB TP-201.3, the compliance equation for a Phase II vacuum assist system with one to six nozzles shall be used for a gasoline dispensing facility with a Phase I vapor recovery system and no Phase II vapor recovery system. This compliance equation for a Phase I vapor recovery system is also included in CARB's Vapor Recovery Certification Procedure CP-201.

- (k) No person shall cause, suffer, allow, or permit a delivery vessel having a maximum capacity of 2,000 gallons (7,570 liters) or greater, except if it is a railroad tank car or marine tank vessel, to contain gasoline unless:
1. The delivery vessel sustains a pressure change of less than three inches of water (six millimeters of mercury) in five minutes when pressurized to 18 inches of water (34 millimeters of mercury) and evacuated to six inches of water (11 millimeters of mercury);
  2. Pressure and vacuum tests are performed on the delivery vessel at least once in every 12-month period, in accordance with test procedures specified by the Department, to determine whether or not the requirements of (k)1 above are met;
  3. A certification is affixed to the delivery vessel in a prominent location, which indicates the identification number of the vessel and the date the vessel last passed the pressure and vacuum tests; and
  4. A record of certification is kept with the delivery vessel at all times and made available upon request by the Department. The record of certification shall include the name and address of the delivery vessel owner; the delivery vessel identification number; and, for each test performed, the test method used, the testing location, date of test, tester's name and signature, and test results.
- (l) No person shall cause, suffer, allow, or permit a transfer of gasoline, to or from a delivery vessel, if the transfer is subject to the provisions of (d) above, and (m) or (n) below, and if the delivery vessel being loaded is under a pressure in excess of 18 inches of water (34 millimeters of mercury) gauge or the delivery vessel being unloaded is under a vacuum in excess of six inches of water (11 millimeters of mercury) gauge.