



Comments on Proposed Amendments to 7 DE Admin. Code 1124
Control of Volatile Organic Compound Emissions Regulations
By Mid-Atlantic Petroleum Distributors Assn.

Thank you. MAPDA's comments are as follows:

We support the regulations moving forward but urge the following considerations:

1. Reconvene the stakeholder group to discuss the provision requiring a complete CARB Phase I EVR system. This provision comes with a significant financial impact and DNREC has not produced the required cost benefit analysis when implementing regulations beyond federal requirements.
2. DNREC and Delaware as a whole has a responsibility to be a fair broker when it comes to regulations and in particular regulations that come with a significant cost to the small business community. Costs and rationales must be taken into account and made public.

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