



My name is Josh Worth and I am with the Environmental Department at Wawa Food Markets. Prior to Wawa, I was with the Bureau of Air Quality with the Pennsylvania Department of Environmental Protection, specializing in Stage I and Stage II Vapor Recovery.

As an Air Quality Specialist, I am always for the reduction of VOC's, but DNREC's requirement for a complete CARB Phase I Enhanced Vapor Recovery System overreaches with no guaranteed improvement in air quality. There is a huge financial impact with no corresponding benefit. We have asked the Division of Air Quality for a Cost-Benefit Analysis of the new requirements, but we never received one. Most state and federal regulatory changes require a Cost-Benefit Analysis to specify the financial impact versus the environmental benefit. This is done for accountability and transparency.

Requiring a CARB Phase I ^{AK} System will cost tank owners \$35,000 to \$50,000 to replace their current system, plus the impact on sales by having to shut down for an extended period of time while the tank field is excavated. There are also costs for required sampling and testing, as well as the cost of preparing permit applications for this retrofit work.

CARB stands for the California Air Resources Board. The EPA used to look to California for Stage II requirements in non-attainment areas throughout the country, but they stopped once Stage II became unnecessary and incompatible with ORVR in vehicles. Why is Delaware attempting to adopt California's requirements when California still uses Stage II? With Stage II, the gasoline vapors that are being returned to the tanks causes over pressurization and subsequent releases of gasoline vapors to the atmosphere. A system without Stage II works under a vacuum and is a vapor tight system.

Requiring a complete CARB Phase I EVR System significantly overreaches with huge financial impact but very limited environmental

benefit. They could require certain EVR components without requiring a station to dig up their entire tank field. When I questioned the Division of Air Quality about this, they replied that CARB could only guarantee a 98% efficiency with all of the components installed. But their system is designed for pressurized tanks with Stage II. This does not correlate to tanks without Stage II in Delaware.

I asked DNREC for a breakdown of how many VOCs will be reduced for each, individual EVR component. They said that they do not know. Why are tank owners being required to dig up their entire tank field to replace spill buckets with EVR spill buckets when DNREC does not even know if an EVR spill bucket will reduce VOCs in a tank working under negative pressure.

They are basing their numbers on Potential to Emit calculations that are used for Stage II tanks and CARBs efficiency guarantees on Phase I systems connected to Stage II tanks. This is not relevant to tanks in the state of Delaware that are not operating Stage II.

CARB's efficiency is based on a 180 day test in the mild and dry climate of California. It does not incorporate the cold temperatures, snow, salt, humidity, ^{and} seasonal temperature differentials of Delaware.

Data on tank pressure collected at the Baker Petroleum site in Seaford proved that even an idle non-Stage II tank will not ^{build} have enough vapor growth to emit vapors for several days. There certainly will not be vapors emitted ^{from} at non-Stage II tanks that are operating 24 hours a day.

I submitted data to DNREC on the system pressure of Wawa's non-Stage II tanks in Pennsylvania. They were operating between negative ~~8~~ 11 inches of water column pressure. The vent stack will not release vapors until a positive pressure of 3 inches of water column pressure. Like the Baker Petroleum Facility, it proves that non-Stage II tanks are

working in a vacuum and there is no need to require far reaching and financially crippling requirements from the state of California.

There is a path forward for DNREC to only require certain components of the Phase I EVR System that do not require the tank field to be dug up and a site to be shut down. They can require CARB approved drop tubes and swivel adapters. This will be much more cost effective and feasible. There is also a path to require EVR spill buckets when a tank owner ^{is planning} ~~was going to~~ replace the existing buckets anyway during a tank top upgrade due to the condition of the concrete pad. This will reduce the huge financial impact of requiring the tank owner to replace spill buckets in a short timeframe and before the tank top even needed to be addressed. ^{concrete}

The Division of Air Quality still should do their due diligence and study how many VOCs an EVR spill bucket will actually reduce in a non-Stage II gasoline tank. There are plenty of tank owners who will be willing to participate in this study to find out if there is a benefit.

If the EPA stopped looking to California 15 years ago, why is Delaware still looking to implement requirements that just do not correlate to a non-Stage II Environment? I hope DNREC will at least consider a path forward that will not bankrupt tank owners and ^{will present a} ~~is~~ a more sensible ^{able} option.

