

In the Matter Of:

Department of Natural Resources & Environmental Control

Vapor Emission Control

Hearing Proposed Revisions

December 08, 2020

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL
OF THE STATE OF DELAWARE

RE: Proposed Revisions to 7 DE)
Admin. Code 1124 Section 36.0)
"Vapor Emission Control at)
Gasoline Dispensing Facilities")
Docket #2020-R-A-0022)

..

Virtual Public Hearing
Dial-In Number: 1-408-418-9388
Event Number: 173 779 4117

Tuesday, December 8, 2020
6:00 p.m.

..

BEFORE: Theresa Newman, Hearing Officer
FOR THE DIVISION: Frank Gao, DNREC

-- Transcript of Proceedings --

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1 MS. NEWMAN: Good evening. I
2 believe everyone is now connected and ready,
3 so we will begin the virtual public hearing.

4 I want to thank you for taking time
5 out of your busy schedules to connect with us
6 today.

7 The date is Tuesday, December 8,
8 2020. We are here this evening to provide a
9 virtual platform for the State of Delaware's
10 Department of Natural Resources and
11 Environmental Control to conduct its virtual
12 public hearing on the proposed revisions to 7
13 DE Admin Code 1124, Control of Volatile
14 Organic Compound Emissions, Section 36, Vapor
15 Emission Control at Gasoline Dispensing
16 Facilities.

17 My name is Theresa Newman, and
18 Secretary Garvin has appointed me to serve as
19 the hearing officer for tonight's formal
20 proceeding.

21 There have been changes made to
22 DNREC's standard hearing protocols
23 necessitated by Delaware's ongoing state of
24 emergency due to COVID-19 pandemic.



1 First and foremost, this hearing is
2 being conducted virtually. No one is
3 gathered in the same room. Everyone is
4 participating independently at their own
5 respective locations.

6 While we are not physically
7 gathered together tonight, WebEx does
8 generate a list of those that are virtually
9 present for this proceeding, so the
10 Department will still have a record for those
11 that have electronically joined.

12 At the conclusion of the
13 introductory remarks, I will be turning the
14 hearing over to Department staff to provide
15 the presentation for the record being
16 generated in this matter.

17 Whereas the Department would then
18 open the verbal comment portion of the
19 hearing, following the Department's
20 presentation, the Department did not receive
21 registration for verbal comment for this
22 hearing.

23 It is important to note that the
24 Department did offer the opportunity for



1 verbal comment, as noticed in the legal ads
2 and online. Those that would have wished to
3 provide a verbal comment would have had to
4 have registered my 12:00 p.m. today, to which
5 there were no registrants by that time.

6 There is a court reporter virtually
7 present, who will prepare a verbatim
8 transcript of this hearing pursuant to the
9 statutory requirement for DNREC to have the
10 same prepared. And, as always, that
11 transcript will be posted on the hearing
12 webpage dedicated to this matter as soon as
13 it is received.

14 In addition, I would encourage
15 those who are attending tonight's hearing to
16 also visit the hearing webpage dedicated to
17 this matter for additional details concerning
18 the proposed regulatory matter.

19 The hearing webpage can be found
20 online under the Administrative Law Section
21 of DNREC's website that will be listed at the
22 conclusion of tonight's hearing.

23 Before we begin the presentation
24 for tonight, please be advised of the



1 following protocols that remain in place for
2 all DNREC public hearings:

3 All comments received must be
4 limited solely to the subject matter of
5 tonight's hearing.

6 All comments pertinent to the
7 subject matter of this virtual hearing will
8 be incorporated into the hearing record being
9 generated in this matter.

10 In order to ensure that everyone
11 who wishes to offer comment for the
12 Secretary's consideration is accommodated,
13 the record in this matter shall remain open
14 for a minimum of 15 days following tonight's
15 proceeding.

16 There is one authentic record of
17 this formal proceeding tonight, and it is the
18 official court reporter's verbatim
19 transcript.

20 The statutory purpose of tonight's
21 hearing is to build a record with regard to
22 the Department's proposed actions. A record
23 consisting of the transcript of the hearing
24 tonight, all written comments, all exhibits,

1 and eventually the Hearing Officer's Report
2 will be reviewed by Secretary Garvin.

3 The Secretary will ultimately issue
4 an order following that review process,
5 containing his decision on this matter and
6 the reason therefor.

7 Per DNREC's standard hearing
8 protocols, there will be no Q and A or chat
9 sessions permitted during this hearing. It
10 is important to note that no decision has
11 already been made by the Department, nor will
12 any decision be made tonight with regard to
13 the proposed regulatory matter.

14 As previously stated, DNREC wishes
15 to ensure that everyone is enabled to offer
16 their comments for inclusion into the record
17 being generated in this matter.

18 In light of the Administrative
19 Procedures Act, the Department is required
20 to, at a minimum, provide a comment period of
21 a minimum of 15 days after the hearing.

22 As noticed in the legal act and
23 online, the Department stated that the public
24 comment will be open through December 23,



1 2020.

2 Subsequent to the notices, the
3 Department has requested an additional 15
4 days for the public comment period, extending
5 the comment period through January 7, 2021.

6 I have taken the request under
7 advisement, and hereby grant the request to
8 extend the comment period for an additional
9 15 days, allowing the public to provide their
10 written comment to the Department. And the
11 record will remain open Thursday, January 27,
12 2021.

13 Comments may be submitted through a
14 comment form link on the hearing page, via
15 e-mail to DNRECHearingComments@delaware.gov,
16 or via the U.S. Postal Services at the
17 physical address for DNREC indicated on the
18 hearing webpage and the public notices
19 previously issued in this matter.

20 Written comments to DNREC may not
21 be submitted by using social media platforms
22 such as Twitter, Facebook, YouTube, or text
23 messaging.

24 Please remember that all comment



1 received either through USPS or via the
2 electronic mechanisms just noted now, as long
3 as received by the Department on or before
4 January 7th will bear the exact same weight
5 and will be considered equally by the
6 Secretary prior to making a final decision in
7 this matter.

8 Lastly, the ultimate decision
9 regarding this matter is made by DNREC's
10 Secretary Garvin.

11 This formal hearing tonight acts as
12 a mechanism to enable the Department to
13 thoroughly vet the regulatory matter to the
14 public and to let the public know the various
15 ways in which comment may be submitted for
16 Secretary Garvin's consideration, if so
17 desired.

18 With that being said, I will now
19 hand it over to Frank Gao with the Division
20 of Air Quality to provide the Department's
21 presentation.

22 Frank, you are unmuted, and you may
23 proceed.

24 MR. GAO: Sure. Good evening. My



1 name is Frank Gao. I am an engineer with the
2 Airshed Planning and Inventory Program for
3 the Division of Air Quality in the Delaware
4 Department of Natural Resources and
5 Environmental Control.

6 The Department is holding today's
7 hearing to receive public comments on the
8 proposed amendments to 7 DE Admin Code 1124,
9 Section 36.0, "Vapor Emission Control at
10 Gasoline Dispensing Facilities."

11 7 DE Admin Code -- oh, sorry. I
12 jumped too much.

13 The objective of the proposed
14 amendments is to update the California Air
15 Resources Board Executive Orders referenced
16 in 7 DE Admin Code 1124, Section 36.0
17 regarding Stage I enhanced vapor recovery
18 systems being used at Delaware gasoline
19 dispensing facilities.

20 The California Air Resources Board
21 is hereafter referred to as CARB.

22 7 DE Admin Code 1124 Section 36.0
23 was amended and adopted on July 11, 2020.

24 Six CARB Executive Orders were



1 referenced in Section 36.0 regarding Stage I
2 Enhanced Vapor Recovery Systems.

3 When adopted in July 2020, Section
4 36.0 did not include CARB's latest updates to
5 those executive orders. The proposed
6 amendments will reflect these latest updates.

7 These latest updates to the
8 referenced executive orders include:
9 Modifications to the Husky Model 5885
10 Pressure/Vacuum Vent Valve; the extension of
11 certifications with the modified 5885
12 Pressure/Vacuum vent valve, to May 31, 2021
13 for Phil-Tite system, OPW system, and CNI
14 system, and to May 31, 2022 for EMCO system.

15 It also includes addition of OPW
16 723 Pressure/Vacuum vent valve for E85
17 applications.

18 Executive Order VR102 added the
19 Franklin Fueling aluminum drop tube and
20 Defender Overfill Protection Valve to the
21 equipment list as an alternate to the OPW
22 aluminum drop tube and overfill prevention
23 device.

24 And also includes for OPW and



1 Morrison Brothers Stage I systems for
2 aboveground gasoline tanks, extension of
3 certifications to July 17, 2023.

4 The proposed amendments to Section
5 36.0 will update the executive order numbers
6 and effective dates and provide the regulated
7 community with additional component
8 flexibility when installing Stage I enhanced
9 vapor recovery system.

10 The proposed amendments include the
11 title number changes in the CARB Executive
12 Orders referenced in Section 36.0, as shown
13 below, where "old" letter struck out and
14 replaced by the underlined "new" letter.

15 The proposed amendment will be made
16 in the following subsections: Subsection
17 36.4.1 and, therein, 36.4.1.1 through
18 36.4.1.1.4, and Subsection 36.4.1.2.1 and
19 36.4.1.2.2, and Subsection 36.10.2, and
20 subsection 36.11.3.1 through 36.11.3.6.

21 In addition, the proposed
22 amendments include adding a phrase to
23 Subsection 36.1.3 to specify the date of the
24 references there, as underlined below on this

1 slide.

2 The proposed amendments being
3 mentioned so far were published in Delaware
4 Register of Regulation on November 1, 2020
5 for public review and comment.

6 In today's hearing, the Department
7 is proposing an additional amendment to
8 update another CARB Executive Order VR-202-W
9 referenced in Section 36.0 though VR-202-Z,
10 which became effective on November 5, 2019.

11 This update will be made in
12 Subsections 36.5.1, 36.5.3, and 36.11.5, as
13 shown in Exhibit 8 for the hearing record.

14 This update is non-substantive, as
15 detailed in the Addendum to the Technical
16 Support Document, which will be submitted as
17 Exhibit 9 to the hearing record.

18 For this newly proposed amendment,
19 the Department requested an additional 15
20 days to the post-hearing comment period to
21 give the public additional time to review and
22 comment.

23 The Department now enters the
24 following exhibits into the public hearing



1 record to support the proposed amendments:

2 Exhibit 1: Start Action Notice
3 approved by the Department Secretary on
4 August 26, 2020.

5 Exhibit 2: The Register Notice and
6 Proposed Amendments to 7 DE Admin Code 1124
7 Section 36.0 "Vapor Emission Control at
8 Gasoline Dispensing Facilities," published in
9 Delaware Register of Regulations, November 1,
10 2020, Volume 24-Issue 5, starting at Page
11 466.

12 Exhibit 3: The affidavit and the
13 legal notice as it appeared in the
14 October 25, 2020 Delaware State News that
15 advertised today's hearing.

16 Exhibit 4: The affidavit and the
17 legal notice as it appeared in the
18 October 25, 2020 News Journal that advertised
19 today's hearing.

20 Exhibit 5: The public hearing
21 notice for today's hearing on the State of
22 Delaware Public Meeting Calendar, as dated
23 October 25, 2020.

24 Exhibit 6: The legal notice for



1 today's hearing, as posted on the website for
2 DNREC Public Hearings, dated October 25,
3 2020.

4 Exhibit 7: Regulatory Flexibility
5 Analysis and Impact Statement Form and its
6 attachment Technical Support Document,
7 published in the Delaware Register of
8 Regulations, November 1, 2020,
9 Volume 24-Issue 5, on Page 467.

10 Exhibit 8: Update of CARB
11 Executive Order VR-202-W to VR-202-Z in
12 Section 36.0, proposed by the Department in
13 today's hearing.

14 Exhibit 9: Addendum to Technical
15 Support Document, demonstrating that the
16 update in Exhibit 8 is non-substantive.

17 Exhibit 10: CARB Executive Order
18 VR-101-T.

19 Exhibit 11: CARB Executive Order
20 VR-102-U.

21 Exhibit 12: CARB Executive Order
22 VR-104-K.

23 Exhibit 13: CARB Executive Order
24 VR-105-I.



1 Exhibit 14: CARB Executive Order
2 VR-401-F.

3 Exhibit 15: CARB Executive Order
4 VR-402-E.

5 Exhibit 16: CARB Executive Order
6 VR-202-Z.

7 Exhibit 17: Proclamation by
8 Governor John Carney, dated March 13, 2020,
9 authorizing all meetings of public bodies in
10 Delaware to be conducted electronically until
11 further notice.

12 Exhibit 18: Department of Natural
13 Resources and Environmental Control website
14 updates, as published on March 19, 2020,
15 addressing services related to COVID-19, and
16 announcing that all Department public
17 hearings will be virtual until further
18 notice.

19 Exhibit 19: The Department's
20 presentation at today's hearing.

21 This completes the Department's
22 presentation for Proposed Amendments to 7 DE
23 Admin Code 1124 Section 36.0 "Vapor Emission
24 Control at Gasoline Dispensing Facilities."



1 Thank you. We are now back to the hearing
2 officer.

3 MS. NEWMAN: Thank you, Mr. Gao.
4 Just for clarification for the record, as you
5 entered in the Exhibit Number 9, I believe
6 you referenced -- you may have referenced the
7 incorrect exhibit that you were going to
8 update.

9 For the record, could you please
10 state for Exhibit Number 9 again what that
11 is? I believe you had marked it as update to
12 Exhibit Number 8. However, it's Exhibit
13 Number 7 listed on the presentation. So
14 could you clarify for the record which one
15 you are referring to?

16 MR. GAO: Exhibit 9?

17 MS. NEWMAN: Yes.

18 MR. GAO: Should refer to Exhibit
19 8.

20 MS. NEWMAN: It should refer to
21 Exhibit 8, not Exhibit 7.

22 MR. GAO: Exhibit 8, not Exhibit 7.

23 MS. NEWMAN: Okay. Thank you.

24 And, Mr. Gao, this now concludes



1 the Department's presentation; correct?

2 MR. GAO: Yes.

3 MS. NEWMAN: Okay. Thank you,
4 Mr. Gao. I'm going to place you on mute
5 again, and then I will continue on to
6 conclude the hearing. Thank you.

7 MR. GAO: Thank you.

8 MS. NEWMAN: Sorry. So this does
9 conclude the Department's presentation. And,
10 as the Department received no registration
11 for the public comment by 12:00 p.m. today,
12 there will be no verbal public comment given
13 tonight.

14 Again, if you wish to submit public
15 comment, please follow instructions given
16 during my introductory remarks. And it is
17 also available on the screen, as you see now,
18 for those who are virtually present.

19 Again, the hearing record will
20 remain open through Thursday, January 7,
21 2020. I want to thank you all for attending
22 the virtual public hearing. The time is now
23 6:19 p.m., and we are concluding the hearing.
24 Thank you. (Concluded at 6:19 p.m.)



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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 13th day of December 2020.



Lorena J. Hartnett
Registered Professional Reporter

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<hr/> <p style="text-align: center;">1</p> <hr/> <p>11 10:23 1124 3:13 10:8,16,22 12:00 5:4 15 6:14 7:21 8:3,9 17 12:3</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2020 3:8 8:1 10:23 11:3 2021 8:5,12 11:12 2022 11:14 2023 12:3 23 7:24 27 8:11</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>31 11:12,14 36 3:14 36.0 10:9,16,22 11:1,4 12:5,12 36.1.3 12:23 36.10.2 12:19 36.11.3.1 12:20 36.11.3.6 12:20 36.4.1 12:17 36.4.1.1 12:17 36.4.1.1.4 12:18 36.4.1.2.1 12:18 36.4.1.2.2 12:19</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5885 11:9,11</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 3:12 8:5 10:8,11,16,22 723 11:16 7th 9:4</p>	<hr/> <p style="text-align: center;">8</p> <hr/> <p>8 3:7</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>aboveground 12:2 accommodated 6:12 act 7:19,22 actions 6:22 acts 9:11 added 11:18 adding 12:22 addition 5:14 11:15 12:21 additional 5:17 8:3,8 12:7 address 8:17 Admin 3:13 10:8,11,16,22 Administrative 5:20 7:18 adopted 10:23 11:3 ads 5:1 advised 5:24 advisement 8:7 Air 9:20 10:3,14,20 Airshed 10:2 allowing 8:9 alternate 11:21 aluminum 11:19,22 amended 10:23 amendment 12:15 amendments 10:8,14 11:6 12:4,10,22 applications 11:17 appointed 3:18 attending 5:15 authentic 6:16</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>bear 9:4 begin 3:3 5:23</p>	<p>Board 10:15,20 Brothers 12:1 build 6:21 busy 3:5</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>California 10:14,20 CARB 10:21,24 12:11 CARB's 11:4 certifications 11:11 12:3 chat 7:8 CNI 11:13 Code 3:13 10:8,11,16,22 comment 4:18,21 5:1,3 6:11 7:20,24 8:4,5,8,10,14,24 9:15 comments 6:3,6,24 7:16 8:13,20 10:7 community 12:7 component 12:7 Compound 3:14 conclusion 4:12 5:22 conduct 3:11 conducted 4:2 connect 3:5 connected 3:2 consideration 6:12 9:16 considered 9:5 consisting 6:23 Control 3:11,13,15 10:5,9 court 5:6 6:18 COVID-19 3:24</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>date 3:7 12:23 dates 12:6 days 6:14 7:21 8:4,9 DE 3:13 10:8,11,16,22 December 3:7 7:24</p>
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