

From: Brad_Weinischke@murphyoilcorp.com
Sent: Friday, October 12, 2012 11:42 AM
To: Santos Olivarez
Subject: Chapter 115 Stake holder Group - Stage II

Mr. Olivarez,

I am responding to the department's request for comments regarding the decommissioning of stage II vapor recovery in Texas. Annual maintenance, training, and testing of a stage II system is by far our greatest operational expense. Reducing this cost would be significant. However, we also have to look at the cost to meet your decommissioning requirements as well as any potential that stage II could be reinstated at a later date.

Have you considered what the requirements will be to verify that a stage II system is properly shut down? Will there be some form of testing required, i.e. pressure decay? Have you considered how you will ensure that closed systems will not impede ORVR function? We will need this information in order to properly budget for shutting systems down when the rule is approved.

Has the TCEQ determined what percentage of existing vehicles in nonattainment areas currently use ORVR? What percentage failure of ORVR must occur before compliance with air quality parameters are threatened? What is the likelihood that stage II would have to be reinstated at a later date? Should we plan to install the below ground portion of a stage II system in any new installations in nonattainment areas for the next 5 years until we are certain that this rule will not be reversed?

Thanks,

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"May peace abound in all that you say and do."

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