

RETAIL

October 22, 2012

Mr. Santos Olivarez
Texas Commission on Environmental Quality
Air Quality Division, MC-206
P.O. Box 13087
Austin, TX 78711-3087

RE: Chapter 115 Stakeholder Group - Decommissioning Stage II Program

Dear Mr. Olivarez:

In response to the TCEQ's request for stakeholder input regarding the decommissioning of stage II vapor recovery systems at gasoline dispensing facilities, we offer the following comments:

- We support the initiative to decommission these systems, and believe the effort to approve and implement the process to do so should be expeditious.
- Implementation of the physical decommissioning process is expected to be fairly straightforward, consisting principally of capping the vapor lines, changing the hanging hardware, and reprogramming the dispenser electronics.
- The cost to decommission the systems should not exceed \$3,000 - \$5,000 per facility, depending on the quantity of dispensers. This does not take into consideration any unanticipated regulatory requirements.
- We believe the labor and materials to implement the decommissioning process are readily available.
- We encourage the TCEQ to consider allowing operators the flexibility to decommission systems through attrition as well as a scheduled deliberate process.
- All applicable local, state and federal permit and inspection requirements associated with stage II vapor recovery systems should be expunged.

We thank you for the opportunity to participate in the advisory process. If you have any questions, please contact me directly at 602-286-1922.

Sincerely,



Roger K. Burton
Western Refining Southwest, Inc.