

Air Quality Technical Advisory Committee

to the Pennsylvania Department of Environmental Protection

PO Box 8468

Harrisburg, PA 17105-8468

April 11, 2019

Honorable Patrick McDonnell
Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063

Re: Proposed Rulemaking for Control of VOC Emissions from Gasoline Dispensing Facilities (Stage I and Stage II) (*25 Pa. Code* Chapters 121 and 129)

Dear Secretary McDonnell:

On April 11, 2019, the Air Quality Technical Advisory Committee (Committee) discussed the proposed rulemaking draft Annex A to amend existing regulations in and add new regulations to *25 Pa. Code* Chapters 121 and 129 (relating to general provisions; and standards for sources) relating to the control of volatile organic compound (VOC) emissions from gasoline dispensing facilities (GDF) equipped with Stage II vapor recovery technology located in the Philadelphia and Pittsburgh areas. This proposed rulemaking would amend existing terms and add new terms in § 121.1 (relating to definitions), amend §§ 129.61 and 129.82 (relating to small gasoline storage tank control (Stage I control); and control of VOCs from gasoline dispensing facilities (Stage II)), and add two new sections, namely, §§ 129.61a and 129.82a (relating to vapor leak monitoring procedures and other requirements for small gasoline storage tank emission control; and requirements to decommission a Stage II vapor recovery system).

There are two types of Stage II vapor recovery technologies: vapor-balance and vacuum-assist. The vacuum-assist Stage II vapor recovery technology is incompatible with the onboard refueling vapor recovery (ORVR) system found on most gasoline-fueled vehicles today. The ORVR systems reduce VOC emissions from refueling similarly to Stage II vapor recovery technology. When a vehicle equipped with ORVR refuels at a GDF using vacuum assist Stage II vapor recovery technology, uncontrolled VOC emissions are emitted into the ambient atmosphere due to the incompatibility. The proposed amendments would require owners and operators of affected GDFs to remove, or decommission, Stage II vapor recovery systems while preserving effective VOC emission control elements of the program.

The Committee voted 16-0-0 (yes-no-abstain) to concur with the Department's recommendation to present the proposed rulemaking amendments to the Environmental Quality Board for consideration for adoption and publication as a proposed rulemaking for public comment.

Sincerely,



Patrick K. O'Neill Esq.
Chair

cc: Krishnan Ramamurthy, Director, PA DEP BAQ
Kirit Dalal, PA DEP BAQ
Chris Trostle, PA DEP BAQ
Susan Hoyle, PA DEP BAQ