

Amendments to COMAR 26.11.24

Stage II Vapor Recovery at Gasoline Dispensing Facilities



Air Quality Control Advisory Council

December 8, 2014





Topics Covered

- Stakeholder Process and Regulation Adoption Schedule
- Background
- Proposed Amendments
 - New, Existing and GDF's undergoing major modifications
 - Decommissioning Requirements
 - Voluntary Electric Vehicle
 Charging option









The Bottom Line

 This regulation fazes out the Stage II Vapor Recovery program as new "On Board" vapor collection technology is about to make the old "Stage II" technology obsolete







Savings to Affected Businesses

- Significant savings from Stage II decommissioning
 - Over 10 year period, large businesses could save up to \$9.5 million in avoided operation and maintenance costs
 - At least \$1 million in savings for all of the larger networks

	# of		Cost Savings
# of Stations	Dispensers	Annual Throughput	Estimate
156	659	221,016,435	\$9,609,600
149	587	176,644,277	\$9,178,400
134	615	189,909,287	\$8,254,400
121	576	202,908,417	\$7,453,600
79	316	90,086,069	\$4,866,400
68	375	131,582,541	\$4,188,800
62	294	82,361,000	\$3,819,200
48	195	72,397,947	\$2,956,800
32	241	112,190,000	\$1,971,200
22	102	44,053,733	\$1,355,200
14	67	30,691,526	\$862,400
13	94	36,501,000	\$800,800
12	62	28,283,000	\$739,200
11	60	37,234,615	\$677,600
8	46	73,000,000	\$492,800
8	46	41,931,387	\$492,800
7	40	9,900,000	\$431,200





Background – Evolving Technologies

- Technology for collecting vapors at gasoline stations has improved
- On July 8, 2011, EPA released a policy called "Widespread Use for Onboard Refueling Vapor Recovery (ORVR) and Stage II Waiver"
- The Clean Air Act (CAA) allows EPA to waive Stage II Vapor Recovery Programs when these new on-board or "ORVR" systems are in widespread use in the vehicle fleet









Why is a Regulation Needed ...

... and what is a SIP?

- The guidance requires states to submit a SIP revision (a modification to the States air quality plan called the "State Implementation Plan" or "SIP") to remove Stage II
 - In general terms, the SIP is a large package of regulations and other programs designed to clean the air and meet the federal standards
 - Stage II is currently required by regulation and part of the Maryland SIP
 - To move away from Stage II that regulation will need to be amended and approved by EPA as a SIP revision
 - States that shut down Stage II without going through the appropriate analysis and without formally amending their SIP face third party litigation and EPA sanctions







MDE's Technical Analysis

- MDE completed a comprehensive analysis consistent with EPA requirements to determine when the benefits from Stage II become minimal
 - Complete analysis is available on MDE web site
 - Discussed at several stakeholder meetings
 - Analysis provides details on the diminishing benefits provided by Stage II systems
 - Shows ORVR "equivalency" in 2017









Basic Regulatory Approach

New Gasoline Stations

 Gasoline Dispensing Facilities (GDFs) constructed after March 6, 2014 may operate without installing Stage II equipment

Existing GDFs

- May decommission Stage II systems after January 1, 2017
- GDFs undergoing Major Modifications
 - May decommission Stage II systems at the modified station after the effective date of the regulation







Other Requirements - Decommissioning

- Decommissioning Procedures
 - A GDF that decommissions
 Stage II shall perform the
 decommissioning in
 accordance with the
 "Recommended Practices for
 Installation and Testing of Vapor
 Recovery Systems at Vehicle
 Refueling Sites" of the
 Petroleum Equipment Institute
 and COMAR 26.10.10.



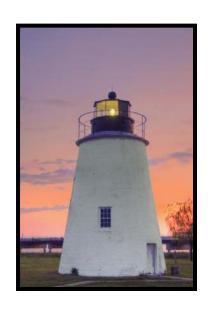






Emerging Technologies

- New "Non-Stage II" emission reduction technologies may be required after 2020 ... if
 - They are certified in California and
 - Maryland designated as Moderate or above nonattainment for the next ozone standard
- Technologies include:
 - Dripless Nozzles to reduce the amount of gasoline spillage during refueling
 - Low Permeation Hoses to permeation through hoses
- To be phased in during routine nozzle and hose replacement schedules
 - Likely to be "standard" equipment by 2020









Electric Vehicle Charging Station Option

- Voluntary option for owners of existing GDFs
 - Allows for early decommissioning of Stage II
 - EV Plan needs to be submitted to and approved by Department
 - EV Charging stations need to be installed by January 1, 2020
 - Number of EV Charging stations to be installed dependent upon number of MD stations owned
 - Several owner groups are already considering EV Charging as part of their business plans

Number of Maryland Stations Owned in 2012	Required Number of DC Fast Charge Electric Vehicle Charging Stations	
1-7	1	
8-49	2	
50-100	5	
Greater than 100	11	





Adoption Schedule

- Proposed Adoption Schedule
 - AQCAC approval requested
 December 8, 2015
 - Notice of Proposed Action published in MD Register -March 20, 2015
 - Public Hearing April 21, 2015
 - Effective Date June 22, 2015









Questions?



