



Department of the Environment

Amendments to COMAR 26.11.24

Stage II Vapor Recovery at Gasoline Dispensing Facilities



Tad Aburn, Air Director, MDE

AQCAC Meeting - March 2, 2015



Topics Covered

- Action from last AQCAC meeting
- Brief summary of proposed amendments
- Changes to the regulation resulting from stakeholder input
- Requested action





December 2014 AQCAC Meeting

- MDE briefed AQCAC on proposed amendments
- A few stakeholders spoke at the meeting and asked for a delay in taking action so that they could work with MDE on several issues
- MDE agreed that additional discussions might be useful
- AQCAC charged MDE to continue discussions with stakeholders and work to resolve several issues
- This process took place in late 2014 and early 2015



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 Stations	# of Dispensers	Annual Throughput	Cost Savings 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 – Transition from Stage II

- Technology for collecting vapors on modern cars has made Stage II systems redundant – *for the most part*
- 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





Technical Analysis – Bottom Line

- In Maryland “Widespread Use” occurs around 2017
- A shortfall (loss of VOC emission reductions) will be created by eliminating Stage II
 - Shortfalls – decrease over time as more ORVR equipped vehicles enter fleet
 - 2014 – 1.74 tons per day (tpd)
 - 2017 – 0.62 tpd
 - 2020 – 0.17 tpd

VOC Shortfall from Eliminating Stage II Requirements (tpd)				
	2014	2017	2020	
All refueling (ORVR & non-ORVR)	1.74	0.62	0.17	



Basic Regulatory Approach

- New Gasoline Stations
 - Gasoline Dispensing Facilities (GDFs) constructed after the adoption of the regulation 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



- MDE has been meeting with stakeholders since early 2012
 - Several briefings to AQCAC
 - Proposed regulation to AQCAC on December 8, 2014
 - Additional stakeholder call held on January 28, 2015 at AQCAC request



Issue 1 – Emerging Technologies

- New “Non-Stage II” emission reduction technologies are soon to be available
- The December draft of the regulation would have required these new technologies after 2020 ... if
 - They were certified in California and
 - Maryland was designated as Moderate or above nonattainment for the next ozone standard
- Technologies included:
 - Dripless nozzles and low permeation hoses
- Stakeholders urged MDE to not include this requirement in the regulation at this time ...
 - But to add it at a later date if the additional reductions are needed
- MDE has agreed to this major change



Issue 2 – Decommissionion ASAP

- Stakeholders have pushed MDE to allow for decommissioning as early as possible
- Although earlier drafts of the regulation had later dates for decommissioning (2019 when almost all ozone and air toxics benefits are gone) ... MDE has agreed to use 2017 as the earliest possible date for full-program decommissioning
- MDE has worked with EPA and followed the EPA guidance and determined that 2017 is the earliest possible date for program-wide decommissioning
 - This is consistent with ... or earlier than ... other states in the region
 - Several situations where earlier decommissioning can take place





Issue 3 - Voluntary Electric Vehicle Charging Station Option

- The regulation continues to include this voluntary option
 - Some private sector stakeholders have continued to strongly oppose this provision, even with it being **totally voluntary** ...
 - ... not clear exactly why – expect comments today
 - Other private sector stakeholders support this voluntary option and have already begun to move down this path
 - Environmental advocacy groups support this option
- Basics on how it works ... again, totally voluntary:
 - Electric Vehicle (EV) Charging Plan submitted to & approved by MDE
 - EV Charging stations installed by January 1, 2020
 - Number of EV Charging stations linked to the number of stations an owner has in the State
 - Allows for early decommissioning



Adoption Schedule

- Proposed Adoption Schedule
 - AQCAC approval requested – March 30, 2015
 - Notice of Proposed Action published in MD Register – June 26, 2015
 - Public Hearing - July 28, 2015
 - Effective Date – September 14, 2015



Questions?

