

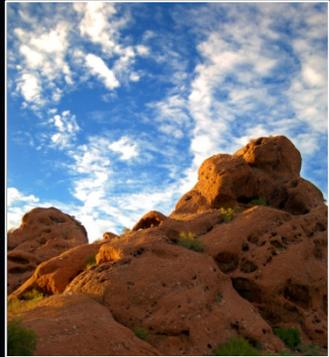
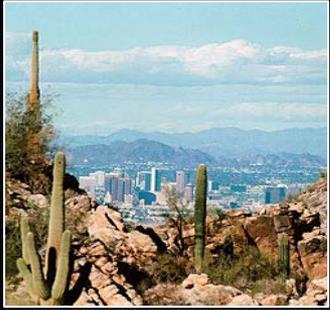
# Update on the MAG 2013 State Implementation Plan Revision for the Removal of Stage II Vapor Recovery Controls



MAG Air Quality Technical Advisory Committee  
October 24, 2013

# EPA Reevaluation of the Approach to Remove Stage II Controls

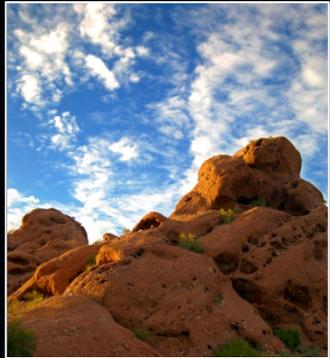
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- On September 17, 2013, EPA indicated that it had reevaluated the approach for this region to remove Stage II vapor recovery
  - Maricopa area has not yet attained the 2008 eight-hour ozone standard (0.075 ppm) and has a 2015 attainment date as a Marginal Area
  - Focus should be on attaining the standard by 2015, rather than on using off-sets for temporary emission increases during the same time period that the area should be attaining the standard

# EPA Reevaluation of the Approach to Remove Stage II Controls

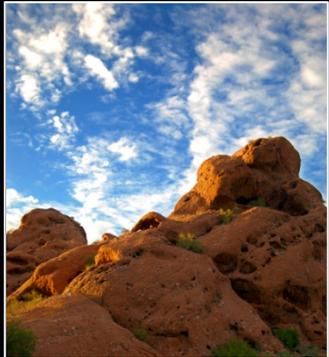
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- EPA described four options for removing Stage II controls, keeping in mind the challenge of meeting the 2008 ozone standard by 2015. To justify a removal schedule for new facilities in 2014 and existing facilities in 2016-2017, the Arizona agencies could:
  1. Do a technical demonstration that the area will attain the 2008 ozone standard of 0.075 part per million by 2015 and the increase in emissions will not impact attainment
  2. Pass a new control measure to off-set increase in emissions
  3. Request a voluntary bump-up of the nonattainment area to Moderate, which has a later attainment date
  4. As an alternative, keep the 2014 date for new facilities and switch to later 2017-2018 for existing facilities, then document how the emissions differences are small and temporary

# Arizona Agencies Present a New Analysis to EPA

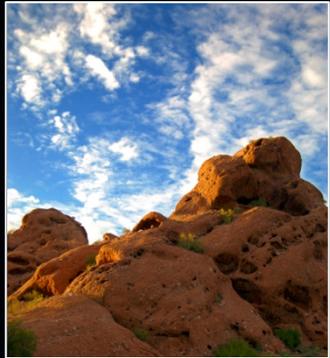
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- **New analysis prepared for three scenarios to remove Stage II to demonstrate that the increase in emissions is smaller for all scenarios, compared to retaining current Stage II requirements**
  - **Remove Stage II for new facilities in 2014, existing facilities in January 2016 - December 2017**
  - **Remove Stage II for new facilities in 2014, existing facilities in January 2017 – December 2018 (EPA suggestion)**
  - **Remove Stage II for new facilities in 2014, existing facilities in October 2016 – September 2018 (decommission after 2016 ozone season)**
  - **Compared the above three scenarios to retaining current Stage II controls**
- **Discussed with EPA on September 27, 2013**

# Regionwide Increase in Emissions from Removal of Stage II Controls

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Stage II Removal Schedule at New and Existing Gasoline Dispensing Facilities	Emission Increase from New Facilities (metric tons/day)		Emission Increase from New and Existing Facilities (metric tons/day)				2014-2019 Summed Emission Increase (metric tons/day)
	2014	2015	2016	2017	2018	2019	
New in 2014, Existing in 2016-2017	0.015	0.019	0.094	0.054	0	0	0.182
EPA Suggested Schedule: New in 2014, Existing in 2017-2018	0.015	0.019	0.015	0.024	0.036	0	0.108
New in 2014, Existing in Oct. 2016-Sept. 2018 (after 2016 ozone season)	0.015	0.019	0.015	0.031	0.023	0	0.102
Retain Stage II Controls	0	0	0	0	0.108	0.244	0.352

## ENVIRONMENTAL PROGRAMS

# Actions Taken by States to Remove Stage II Controls

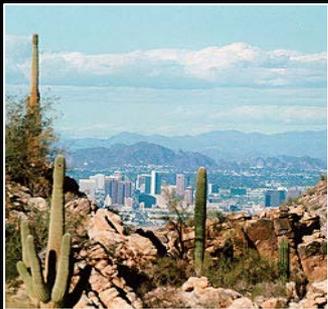
- Issuance of enforcement discretion or compliance waiver allowing removal of Stage II controls:
  - Connecticut – for new facilities beginning February 2012
  - Indiana – for new and modified facilities beginning April 2013
  - Massachusetts – for new or modified facilities beginning July 2012, all facilities as of July 2013. Updated Stage I systems required as part of decommissioning
  - Missouri – for new and modified facilities beginning August 2012, all facilities as of March 2013
  - New York – for new and existing facilities beginning January 2011
  - Pennsylvania – for new facilities beginning July 2012
  - Texas – for new and modified facilities beginning May 2012
  - Virginia – for new facilities beginning July 2012



# Actions Taken by States to Remove Stage II Controls

## ENVIRONMENTAL PROGRAMS

- Passed statute and/or rule allowing removal of Stage II:
  - Connecticut - Public Act No. 13-120 prohibits installation of Stage II on or after June 18, 2013 and all facilities must remove Stage II by July 1, 2015
  - Florida – Stage II removed by rule at new facilities beginning in 2007 and existing facilities in 2010. EPA approved rule in 74 FR 26103 on June 1, 2009
  - Kentucky – Proposed rulemaking for removal of Stage II in Louisville area, no specifics on dates available
  - Maine – Stage II repealed in rule January 1, 2012, all facilities must decommission by January 1, 2013
  - New Hampshire – Stage II requirements removed by rule beginning January 2012, all facilities must decommission by December 22, 2015



# Actions Taken by States to Remove Stage II Controls

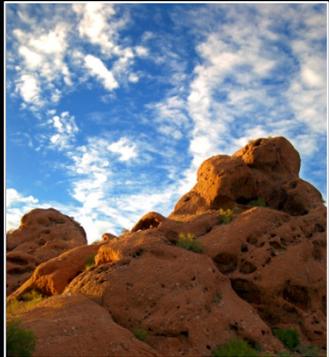
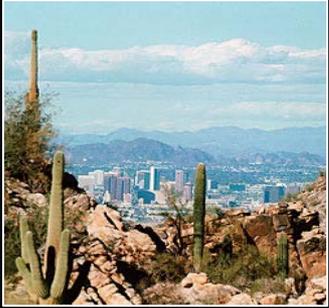
- **Passed statute and/or rule allowing removal of Stage II:**
  - **Ohio – New facilities exempted from Stage II by rule beginning April 2013. Proposed rule states that all facilities must decommission by 2017 and install low permeation hoses**
  - **Rhode Island – Passed statute in 2012 which exempts new and modified facilities from Stage II requirements. Proposing a rule to allow decommissioning of all facilities after effective date of rule, all facilities must decommission by December 22, 2017 under proposed rule. Proposed rule also updates Stage I controls**
  - **Texas – Proposed rule requires all facilities to decommission by August 31, 2018. Rule proposes that decommissioning can begin 30 days after EPA approval of rule**
  - **Vermont – Statute passed in 2009 phased out Stage II for new facilities, all facilities can decommission beginning January 1, 2013 and have two years to decommission**



# Actions Taken by States to Remove Stage II Controls

## ENVIRONMENTAL PROGRAMS

- Passed statute and/or rule allowing removal of Stage II:
  - Virginia – Proposed rule would allow for all facilities to begin decommissioning on January 1, 2017
  - Wisconsin – Passed statute in 2011 allowing removal of Stage II for all facilities upon EPA widespread use determination.



# Actions Taken by States to Remove Stage II Controls

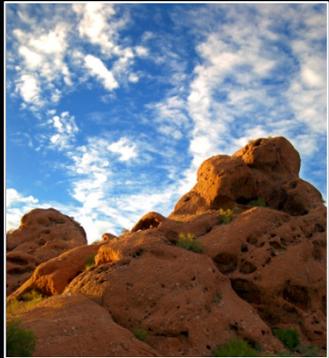
- **110(I) demonstrations in State Implementation Plan revisions to remove Stage II requirements:**
  - **Rhode Island – Disbenefit of Stage II controls occurs in 2018. Revision proposes that all facilities decommission by December 22, 2017 and includes updates to Stage I controls. 110(I) analysis argues the emission increases from the removal of Stage II are small and will not interfere with attainment. Area designated unclassifiable/attainment for 2008 ozone standard.**
  - **Virginia – Disbenefit of Stage II controls occurs in 2017. Revision proposes to remove Stage II requirements beginning January 1, 2017. 110(I) analysis shows decommissioning beginning during disbenefit year and discusses how declining emissions from other sources more than compensates for any Stage II benefit that might be lost. Also includes a demonstration that NO<sub>x</sub> reductions are more effective than VOC reductions in the area. Area is attaining the 2008 standard.**



# Actions Taken by States to Remove Stage II Controls

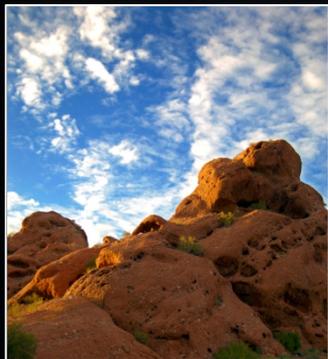
## ENVIRONMENTAL PROGRAMS

- **110(I) demonstrations in State Implementation Plan revisions to remove Stage II requirements:**
  - **Wisconsin – Disbenefit of Stage II controls occurs in 2016. Revision allows for removal of Stage II controls after EPA widespread use determination. 110(I) analysis uses emission credits from closed point source facilities to off-set benefits of Stage II controls before disbenefit year. EPA has proposed to approve this demonstration in 78 FR 34966, on June 11, 2013. Area is designated a marginal nonattainment area for 2008 ozone standard.**
  - **Texas – Disbenefit does not occur in Texas because there are no incompatibility issues. Revision proposes all facilities decommission by August 31, 2018. 110(I) analysis shows that benefits of Stage II are less than 1% of VOC inventory. The analysis also modeled ozone concentrations after removal of Stage II controls (max increase of 0.02 ppb). Texas has one moderate and one marginal nonattainment area for the 2008 ozone standard.**



# Actions Taken by States to Remove Stage II Controls

- **110(I) demonstrations in State Implementation Plan revisions to remove Stage II requirements:**
  - **Missouri – Disbenefit does not occur in Missouri because there are no incompatibility issues. No firm date set in revision for Stage II removal, state is currently moving forward with decommissioning of all facilities under department approval beginning March 2013. 110(I) analysis argues that mobile source emissions still decline after removal of Stage II controls and that the benefits of Stage II controls are small. The analysis also provides a comparison of current mobile source inventories vs. mobile source inventories in the SIP. The current inventories are smaller than what is in the SIP, effectively arguing that the SIP has surplus mobile emissions. The St. Louis area is designated a marginal nonattainment area for the 2008 ozone standard.**





**MARICOPA  
ASSOCIATION of  
GOVERNMENTS**



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