

US EPA ARCHIVE DOCUMENT



COMMONWEALTH of VIRGINIA

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September 30, 2004

MEMORANDUM

TO: Tom Driscoll
Senior Environmental Scientist
Office of Air Quality Planning & Standards

FROM: James Ponticello *JP*
Mobile Source Engineer

SUBJECT: Comments on report titled: Stage II Recovery Systems Issues Paper

Attached, please find comments from the Commonwealth of Virginia on the above mentioned subject. If you have any questions please contact me at jpponticello@deq.virginia.gov or at (804) 698-4405.

JPP/mem

Attachments

cc: John Daniel, DEQ
Robert Mann, DEQ
James Sydnor, DEQ

Commonwealth of Virginia
Comments Concerning Stage II Vapor Recovery System Issues
September 30, 2004

The following comments on the August 12, 2004, EPA report: Stage II Vapor Recovery Systems Issue Paper are submitted by the Commonwealth of Virginia.

Definition of Widespread Use

Of the several alternatives of definition for widespread use provided by EPA in the August 12 issue paper developed by EPA, Virginia supports definition (c). That definition for widespread use states: "VOC emissions with ORVR controls equal VOC emissions with Stage II only. We believe this is the most appropriate way to determine "widespread use," when the total VOC emissions from ORVR-equipped vehicles are equal to the total VOC emissions from Stage II VRS programs only, since it is a direct comparison of emission levels (and it results in the earliest date of achieving widespread use). Since this method directly compares emission levels, we do not feel a "combination of definitions" is appropriate.

Widespread Use Algorithm Development

It would be helpful for EPA to develop an algorithm to compute the magnitude of "incompatibility excess emissions," using locality-specific inputs, so that states can determine the significance of this problem.

Uniform, Nationwide Widespread use Definition

We do not believe that the date "widespread use" occurs should be the same for all areas; however, we do believe that the definition of widespread use should be consistent nationwide, with locality-specific data being supplied to the algorithms. As noted, the date "widespread use" occurs will depend upon such factors as fleet turnover, control efficiency, temperatures, and the percentage of vacuum-assist Stage II systems used in an area.

SIP Credits

We agree that SIP credits should be made available for areas that require Stage II controls to remain in place after "widespread use" has been determined.

Ancillary Emissions Issues

Regarding vent emptying and breathing emissions, it would be appropriate to develop an updated algorithm that incorporates locality-specific data to calculate their magnitude.

Continued Use of Stage II VRS

We agree that it is appropriate for EPA to provide an additional mechanism for OTR states to be able to phase out of the section 184(b)(2) Stage II or comparable measure requirement, similar to that provided for moderate or worse nonattainment areas under section 182(b)(3) once ORVR controls are determined to be in "widespread use." To accomplish this, we are in favor of using the approach of updating the "Stage II Comparability Study" with a baseline that coincides with the year that ORVR is determined to be in widespread use.

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