

# Gasoline Dispensing Facility Emissions Rulemaking Rulemaking Advisory Committee Meeting #3

## DEQ Air Quality Planning

Aug. 29, 2023

Remotely Held Meeting

# Agenda

Time	Item
1 p.m.	<b>Introductions</b> Introductions, agenda review, updated timeline
1:05 p.m.	<b>DEQ presentation</b> Division and rule organization
1:15 p.m.	<b>DEQ presentation</b> Control technology requirements and rule changes
1:45 p.m.	<b>Discussion</b> RAC feedback and questions
2:45 p.m.	<b>Discussion</b> Next steps and public input
3 p.m.	Adjourn Meeting

# Introductions

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- Hello and welcome
- Introductions
  - DEQ Staff and Facilitator
  - Rulemaking Advisory Committee members
- Purpose of meeting

# Rulemaking Resources

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[Gas Dispensing Facilities 2022 Rulemaking page](#)

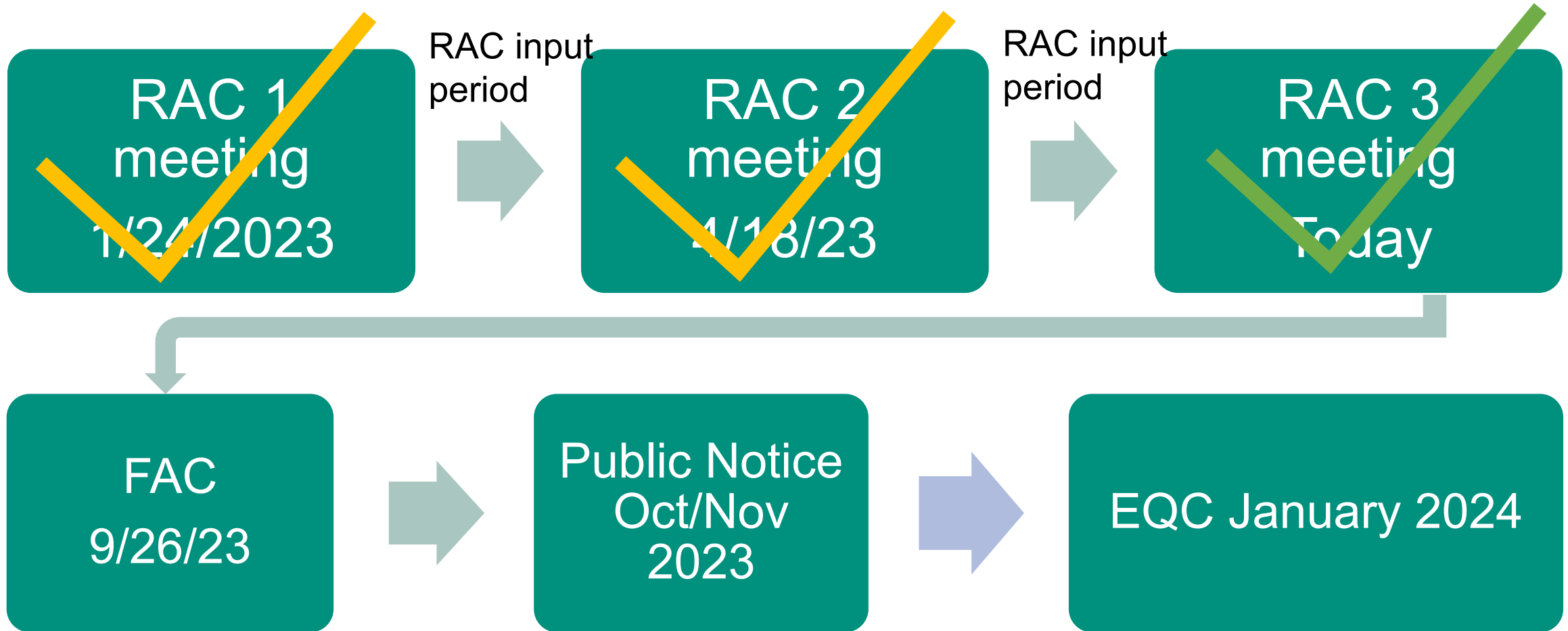
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503-875-5520

# Anticipated Timeline



# Rule Organization & Structure

Rule Citation	Rule Name	Description
-0230	Definitions	Terms and phrases used throughout the rules defined
-0234	Affected Equipment and Sources	Description of GDF 1 through 5
-0237	GDF 1	Sites that only have storage tanks of under 250 gallon capacity
-0238	GDF 2	Sites that have a storage tank above 250 gallon capacity
-0241	GDF 3	Sites with 120,000 gpy throughput
-0242	GDF 4	Sites with 600,000 gpy throughput
-0243	GDF 5	Sites with 1,000,000 gpy throughput

# Rule Organization & Structure (cont.)

Rule Citation	Rule Name	Brief Description
-0245	Work Practices, No Top Off, and Submerged Fill	-
-0246	Enhanced Vapor Recovery Requirements	EVR/enhanced stage I requirements
-0247	Stage II Vapor Recovery System	Requirements for decommissioning stage II or keeping it when allowed
-0248	Vapor Balance System	Stage I vapor balance system requirements
-0249	Testing and Monitoring Requirements	-
-0250	Recordkeeping	-
-0251	Reporting	-

# Rule Organization & Structure (cont.)

## [OAR 340-244-0241](#)

### Gasoline Dispensing Facilities: GDF 3

- (1) The owner or operator of a GDF 3 as described in OAR 340-244-0234(4) must comply with the following requirements:
  - (a) All applicable requirements under OAR 340-244-0238; and
  - (b) Testing requirements under OAR 340-244-0249.
- (2) The owner or operator of a **new** GDF 3 must comply with OAR 340-244-0248 and install a dual-point vapor balance stage I system on each gasoline storage tank with 250 gallon or greater capacity. Notwithstanding the testing requirements of OAR 340-244-0249, a complete stage I vapor balance system must be installed before equipment is placed in gasoline service.
- (3) The owner or operator of an **existing** GDF 3 must comply with OAR 340-244-0248 and install a dual-point vapor balance stage I system on each new or replaced gasoline storage tank with 250 gallon or greater capacity.

## [OAR 340-244-0248](#)

### Gasoline Dispensing Facilities: Vapor Balance System

- (1) The owner or operator of a GDF or storage tank referred to this rule, except for gasoline storage tanks with floating roofs or the equivalent, must meet each of the following management practice and equipment requirements that applies to the GDF:

## [OAR 340-244-0249](#)

### Gasoline Dispensing Facilities: Testing and Monitoring Requirements

- (1) Effective March 1, 2024 the testing listed in Table 1 shall be conducted and passed for each stage I vapor balance system, stage I enhanced vapor recovery system, and stage II vapor recovery system, as applicable.
  - (a) For **new stage I systems**, initial testing shall be conducted and passed prior to placing the equipment into gasoline service. If necessary for testing purposes, enough gasoline to conduct the performance test may be loaded into the gasoline storage tank(s) at the GDF.



# Controls Technology and Rule Changes

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- Gasoline Dispensing Facility types (1-5)
- Rule requirements
- Emissions reductions

# Control Technology and Equipment Changes

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## GDF Type 1

Site with only  
storage tanks  
under 250 gallon  
capacity

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### Requirements

- Work practices (minimize emissions)
- No Topping Off
- Recordkeeping

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### Emissions Reductions

None from current rules

# Control Technology and Equipment Changes

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GDF Type 2

Sites with a storage tank at 250 gallon or greater capacity

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## Requirements

- All previous, plus:
- Submerged fill

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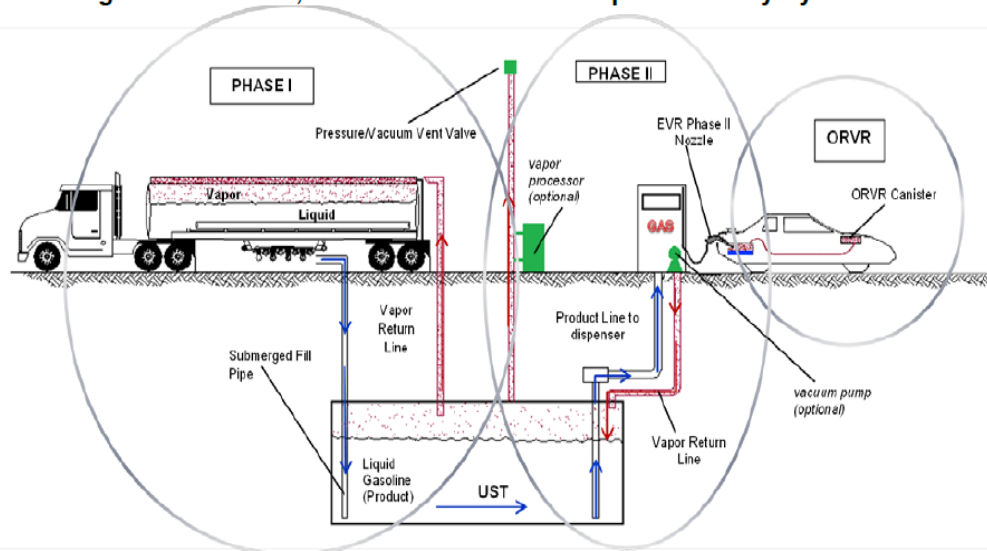
## Emissions Reductions

None from current rules

# Control Technology and Equipment Changes

## GDF Type 3 Sites with 120,000 gpy throughput

Figure II-I: Phase I, Phase II and Onboard Vapor Recovery Systems



### Requirements

- All previous, plus
- Stage I vapor balance
  - New (all) vs. Existing (replaced/new)
- Testing

### Emissions Reductions

None in Air Quality Management Areas  
Stage I controls @ 120,000 gpy vs.  
current 480,000 statewide

~56 tons of VOC reduction

# Control Technology and Equipment Changes

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## GDF Type 4

Sites with 600,000  
gpy throughput

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### Requirements

- All previous, plus:
- Stage II incompatible replaced with EVR & Enhanced Conventional, or ECO, nozzles by 12/31/2024
- Stage II compatible optional to replace; EVR and ECO nozzles when Stage II removed
- Statewide new or replaced tanks = EVR

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### Emissions Reductions

EVR & ECO in lieu of stage II and stage I  
EVR & ECO statewide when tanks replaced  
~270 tons of VOC reduction

# Control Technology and Equipment Changes

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GDF Type 5

Sites with  
1,000,000 gpy  
throughput

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## Requirements

- All previous, plus:
- New = EVR + ECO
- Existing = EVR + ECO by 7/1/2025

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## Emissions Reductions

**EVR & ECO at all high throughput sites**

**~292 tons of VOC reduction**

# RAC Feedback and Questions

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## Timing:

- New sites | Replaced tanks | Existing sites
- Stage II incompatible = remove by 12/31/2024
  - Same sites install EVR and ECO by 12/31/2024
- Stage II compatible = add EVR and ECO when stage II removed (no set date)
- 1,000,000 gpy sites = EVR and ECO install by 7/1/2025
  
- Stage I vapor balance
- Increase throughput and trigger stage I equipment = install within two years (down from three)
- Existing sites = stage I vapor balance with replaced or new tank

# RAC Feedback and Questions

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## No Top off:

- Any thoughts or suggested changes based on new legislation? ([HB2426](#))

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## Definitions

- 'Existing' = 7/1/2024
  - 'new' = everything after
  - Monthly throughput = 12-month average
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# RAC Feedback and Questions

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## **Alternative controls:**

- Equivalent reductions possible?
  - How would permittees show it is as protective?
  - “mix and match” Stage I EVR?
  - Vapor processors
  - Other controls
  - Processes and procedures for review/approval
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# RAC Feedback and Questions

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## Testing:

Frequency  
Applicability

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## Reporting:

- What/when to report
  - Other items that *should* be reported
  - -Annual or other frequency
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## Organization:

- Rule layout
  - Cross references
  - Simple? Easy?
  - Complicated? Confusing?
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# RAC Feedback and Questions (through 2:45)

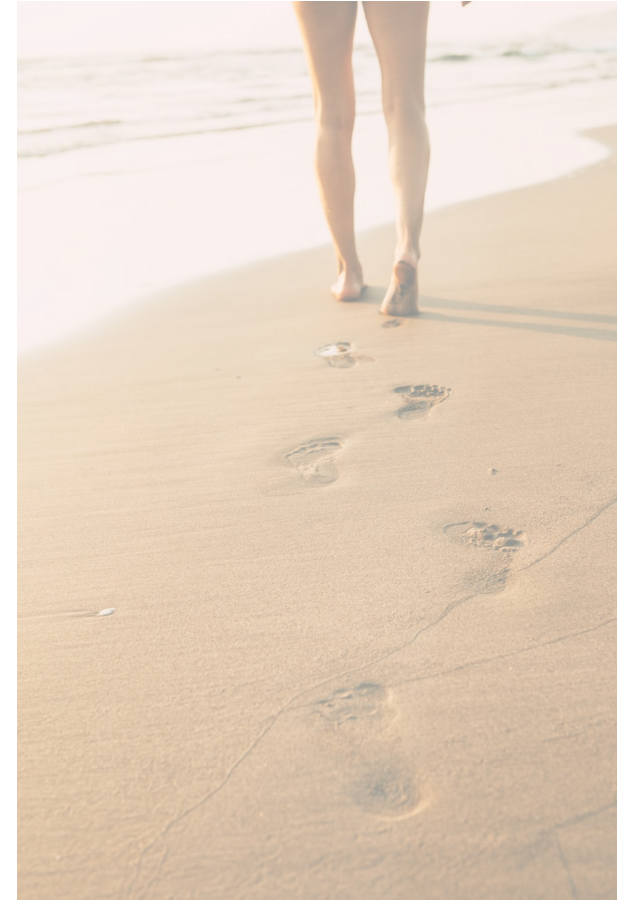
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## **Open Discussion for the RAC**

- Anything else**
  - Questions or information requested for the fiscal meeting**
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# Next Steps

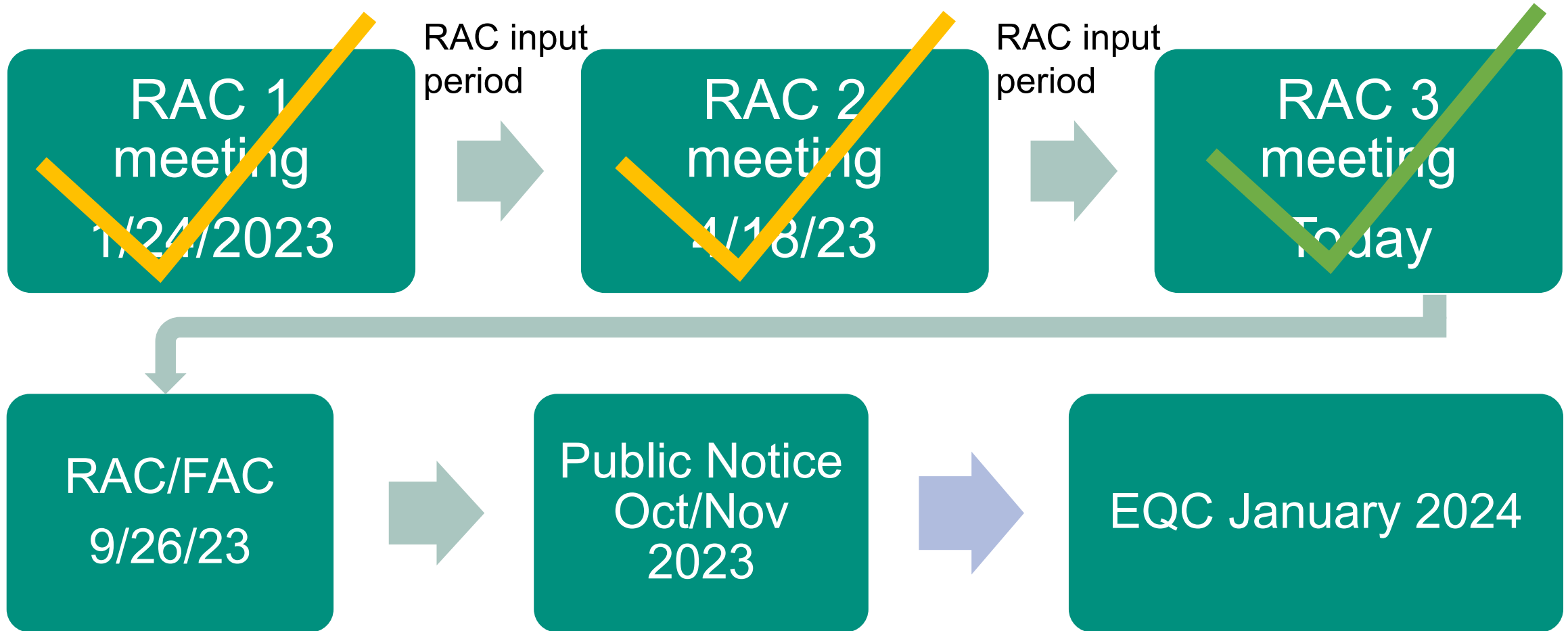
- ❑ DEQ draft rule changes in response to RAC
- ❑ Fiscal Advisory Committee 9/26/23
  
- ❑ RAC decision: public input during this meeting?



# Pause for Public Input [if needed]



# Anticipated Timeline



# Thank you

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[Gas Dispensing Facilities 2022 Rulemaking page](#)

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