



Oregon Department of Environmental Quality

Discussion Prompts

Gasoline Dispensing Facility Emissions 2022 Rulemaking Advisory Committee Meeting #1

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The intent of this rulemaking is to examine benefits to expanding Stage I control requirements, removing or modifying Stage II control requirements, and adding EVR control requirements. Additional details on these potential changes are provided in the Controls Summary fact sheet, and Scenarios Analysis fact sheet, provided on the rulemaking website.

Overview

Below are some initial discussion questions and requests for input for RAC members to consider before the January 24, 2023 rulemaking advisory committee meeting. Discussion topics, questions, and comments are not limited to these questions. These questions are provided in advance to support advisory committee and public engagement.

Controls

- How do the various controls analyzed affect fuel profits? Are there other factors DEQ should consider regarding small businesses?
- At this point, DEQ did not include Stage II EVR or In-Station Diagnostics in the analysis. Would RAC members like to see Scenario(s) that include these controls?

Scenarios

DEQ analyzed eight scenarios to examine potential emissions reductions and costs from various changes in requirements.

- Are there other specific scenarios DEQ should look at, beyond the eight presented in the white paper?
- Are there changes to any of the scenarios that you would recommend? Why?
- Are the cost estimates included reasonable? Is there better cost-related data available that you can share with DEQ?

Other factors

There are various other factors that DEQ did not analyze at this time. DEQ appreciates any input on the importance of analyzing these factors.

- Are there changes in throughput limits that DEQ should examine? If so, why?
- Are there concerns with having tiered requirements based on the gasoline throughput?
- Would changes to inspection, monitoring, recordkeeping, and/or reporting requirements provided additional emission reductions? How so?
- It has come to DEQ's attention that corrosion at the turbine heads may be an additional point of emissions. Does the RAC have any suggestions for fixing this potential issue? Does the RAC have any input regarding how pervasive this issue may be?
- Are there other analyses that would help you provide advice to DEQ on this rulemaking?

Timeline

DEQ would like to discuss appropriate lead time for changing the control requirements. DEQ would appreciate discussion on requiring changes based on the following (and how they may / may not be appropriate for certain controls):

- By a certain date.
- Upon repair or replacement of existing parts.
- Upon installation / replacement of a storage tank or dispenser.

Alternate formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.oregon.gov.