

ILLINOIS POLLUTION CONTROL BOARD
September 8, 1983

IN THE MATTER OF:)
)
STAGE II VAPOR RECOVERY)
CONTROLS AT GASOLINE) R83-17
DISPENSING STATIONS)

Preliminary Inquiry Hearings.

ORDER OF THE BOARD (by J. D. Dumelle):

A compilation of 1983 ozone excursions by the Illinois Environmental Protection Agency (Agency) through August 10, 1983 shows 29 violations (two or more excursions) at 18 locations. The highest value recorded was 0.188 ppm (parts per million) at the Chicago Southwest Pumping Station on June 23, 1983.

Figure 1 (page 43) of the May 4, 1983 comments by the Agency to United States Environmental Protection Agency's (USEPA's) proposed February 3, 1983 Federal Register rulemaking estimates that Stage II vapor recovery controls at gasoline dispensing stations would capture approximately 17,500 tons of volatile organic compounds (VOCs) a year at a total cost of \$10,500,000 or about \$600 per ton. Reduction of VOC emissions in turn reduces ozone ambient air concentrations.

It is evident that further VOC controls are needed in order to eliminate the violations of the National and Illinois ambient air quality standards for ozone (0.12 ppm). Proportional rollback computations using the 0.188 ppm level appear to indicate a need for the removal of at least 37% of the hydrocarbons now being discharged to the atmosphere.

Stage II vapor recovery controls have been in use in California since 1979 and in the District of Columbia and are being considered in New York, New Jersey and Maryland. The \$600 per ton cost, if accurate, appears reasonable compared to other strategies to control volatile organic compounds.

In order to determine whether such controls should be required as part of an effective strategy to reduce VOC emissions, the Board on its own motion will conduct a series of inquiry hearings. The Board further proposes that a preliminary draft regulation which is adapted from the California rule published in the Environmental Register. The Board intends that this draft raise issues for discussion and comment, rather than constitute a formal proposal for rulemaking. The Board requests that public comment and alternative proposals on these issues be submitted to the Board within the next 60 days. These comments will be made

a part of the record in R83-17. Unless the comments justify an alternative course of action, hearings will be scheduled upon the close of the 60 day comment period. The Board will especially appreciate testimony or comment on the following:

1. The need for additional volatile organic compound control in Illinois;
2. The cost of Stage II vapor recovery systems and who will bear that cost;
3. The problems to the public in using this equipment at self-service gasoline stations;
4. The geographic area of the State where vapor recovery controls are needed (non-attainment counties, contiguous counties or state-wide);
5. Vandalism and maintenance problems that may be expected; and
6. Health benefits, if any, to the public directly attributable to eliminating the inhalation of gasoline vapors.

The preliminary draft proposal, below, is presented in a format consistent with the codification scheme proposed for Chapter 2: Air Pollution, since codification of that chapter should be completed prior to any final action in this matter. Under old Chapter 2, these preliminary draft rules would be added as part of Rule 205 (p).

Preliminary Draft Proposal for Discussion at Inquiry Hearings
Based on California Regulation.

AMENDMENTS TO:
TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER I: POLLUTION CONTROL BOARD
SUBCHAPTER c: EMISSION STANDARDS
AND LIMITATIONS FOR STATIONARY SOURCES

PART 215
ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS
SUBPART Y: GASOLINE DISTRIBUTION


Section 215.584

- a) All gasoline stations in the counties listed in Subsection (c), which dispense more than 50,000 gallons per month shall have vapor recovery systems installed to control each pump nozzle. Stations which service private fleets shall also be controlled if the volume requirement is met.

- b) Vapor recovery systems shall have a collection efficiency of at least 92% and be approved by the Agency. A permit shall be obtained from the Agency prior to installation.
- c) Vapor recovery systems shall be installed in the following counties: Boone, Clinton, Cook, DeKalb, DuPage, Grundy, Kane, Kankakee, Kendall, Lake, Madison, McHenry, Monroe, Randolph, St. Clair, Washington, and Will.
- d) All gasoline dispensing stations at which vapor recovery systems have been installed shall post operating instructions for the public in a manner to be specified by the Agency.
- e) Vapor recovery systems shall be maintained in good working condition.
- f) The requirements of this Section shall be met by July 1, 1986.

IT IS SO ORDERED.

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Order was adopted on the 8th day of September 1983 by a vote of 5-0.


Christan L. Moffett, Clerk
Illinois Pollution Control Board