

July 13, 2012

Lynn Dail
Environmental Scientist
U. S. Environmental Protection Agency
OAQPS/AQPD/SLPG (C539-01)
RTP NC 27711

Glenn Passavant
Center Director
USEPA National Vehicle and
Fuel Emissions Laboratory/OAR
2565 Plymouth Road
Ann Arbor, MI 48105

RE: Draft "Guidance on Removing Stage II Gasoline Vapor Control Programs from State Implementation Plans and Assessing Comparable Measures."

Dear Lynn and Glenn:

The Ozone Transport Commission (OTC) appreciates the opportunity to provide early comments on the draft document "Guidance on Removing Stage II Gasoline Vapor Control Programs from State Implementation Plans and Assessing Comparable Measures." We had, however, hoped that EPA would provide more time for review and comment. We had also hoped to have the opportunity to discuss the OTC portion of the guidance in more depth with EPA.

As EPA lowers the National Ambient Air Quality Standard (NAAQS) for ground-level ozone to be more protective of the public health, it becomes more challenging to find emission reductions in the Ozone Transport Region. While stage II vapor recovery systems (Stage II) can place an economic burden on gasoline dispensing facilities, and while in time, onboard vapor recovery systems will become widespread enough to result in equivalent emission reductions, it is important to prevent the backsliding that could result from early removal of Stage II.

OTC appreciates EPA's simplification of the process of demonstrating widespread use as recommended in the draft guidance. State air programs have limited resources and are under increased financial pressure due to the current economic climate. Many programs cannot afford to undertake an extensive analysis. However, OTC is concerned that proper care may not have been taken in evaluating the formulas provided in the guidance. EPA requires that states use the Motor Vehicle Emission Simulator (MOVES) for estimating emissions from the mobile sector, including emissions from refueling, in State Implementation Plans (SIPs). EPA has used the MOVES model to estimate certain energy output and VMT factors, not emissions specifically. Independent MOVES model analyses conducted by OTC member states (with off model calculations addressing incompatibility) have indicated that equivalent emission benefits (i.e. no increase in emissions) may occur later than what EPA estimates. OTC urges EPA to better demonstrate that the formulas used to determine equivalent emission benefits produce results that are consistent with those produced when the MOVES model is used to predict refueling emissions.

In conclusion, OTC urges EPA to better demonstrate the validity of the formulas used to determine equivalent emission benefits. OTC respectfully submits these comments for EPA's consideration in developing a final guidance document. Please contact me with any questions at (202) 508-3840.

Sincerely,

Joseph Jakuta
Environmental Associate

CC: Scott Mathias, EPA OAQPS, Air Quality Policy Division, Director
OTC Air Directors
Wick Havens, OTC, Interim Executive Director