## Independent Oil Marketers Association of New England

## MassDEP Stage I Enhanced Vapor Recovery

The MassDEP requires California Air Resources Board (CARB) Certified Stage I Enhanced Vapor Recovery (EVR) Equipment be installed at gasoline dispensing facilities to achieve 98% vapor recovery efficiency. The CARB Certified Stage I EVR equipment costs on average an additional \$5,000 per gasoline dispensing facility to purchase and install. In addition, MassDEP adopted CARB Stage I EVR testing requirement which costs on average an additional \$250/year.

Adopting the requirement to install CARB Certified Stage I EVR equipment is more stringent than that required by the United States Environmental Protection Agency (US EPA). The CARB Certified Stage I EVR equipment captures 98% of vapors emitted during gasoline tanker transport delivery into underground storage tanks which is more stringent than the 95% efficiency adopted by the US EPA. Therefore, MassDEP should roll-back the requirement for CARB Certified Stage I EVR equipment and adopt regulations which mirror those of the US EPA in accordance with the requirements of Executive Order 562.