

March 19, 2025

MEMORANDUM

To: Owners and operators of gasoline dispensing facilities located in Philadelphia

From: Maryjoy Ulatowski, Chief of Source Registration, Air Management Services

Re: Decommissioning Stage II Vapor Recovery Systems at Gasoline Dispensing Facilities

On March 26, 2022, the Pennsylvania Department of Environmental Protection (PADEP) finalized regulatory requirements to allow gasoline dispensing facility (GDF) owners and operators to decommission Stage II vapor recovery systems in 12 counties in the Pittsburgh and Philadelphia areas (see 52 Pa. B. 1875¹; March 26, 2022).

The rulemaking established compliance dates of December 31, 2022, for the removal or decommissioning of Stage II vacuum-assist vapor recovery systems; March 26, 2024, for the installation of low permeation hoses; and May 14, 2024, for ECO nozzles.

Air Management Services (AMS) is currently working to amend Air Management Regulation (AMR) V § V.C. to update the vapor recovery provisions to comply with PADEP regulations.

Until AMR V § V.C. is amended, AMS is using its enforcement discretion as follows:

- AMS will no longer enforce the vapor control system requirements listed in AMR V § V.C.
- The deadline to remove Stage II vacuum-assist vapor recovery systems is extended to May 31, 2025.
 - Any GDF that removes its Stage II vapor recovery systems must submit a notification to AMS².
 If not submitted previously, please submit notification to <u>Maryjoy.Ulatowski@phila.gov</u> or <u>DPHAMS Service Requests@phila.gov</u> by May 31, 2025.
- For existing dispensers, low permeation hoses must be installed by May 31, 2025, and ECO nozzles must be installed by May 31, 2025. The deadline to install low permeation hoses and ECO nozzles will not be extended.
- New gasoline dispensing facilities or existing facilities that are increasing monthly throughputs from their permitted limits or installing new dispensers must obtain installation permits. The installation

¹ https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol52/52-13/485.html

² https://www.depgreenport.state.pa.us/elibrary/GetFolder?FolderID=335032

permits can be found at the following website: https://www.phila.gov/documents/apply-to-install-equipment-that-emits-or-controls-air-pollution/.

• GDFs are required to meet any applicable requirements of 40 CFR 63 Subpart CCCCCC, 25 Pa. Code §129.61a, and 25 Pa. Code §129.82a.

Questions pertaining to the contents of this memorandum or air pollution requirements applicable to Philadelphia GDFs, may be forwarded to AMS Source Registration by email (DPHAMS Service Requests@phila.gov or Maryjoy.Ulatowski@phila.gov).