

## **Urgent: Follow Up to EMA Bulk Plant Vapor Recovery Survey**

The EPA is proposing to require vapor balancing equipment at any bulk plant with gasoline storage tanks. Under the proposal, any bulk plant with a maximum daily design throughput capacity of 4,000 gallons or more of gasoline would require vapor recovery for loading and unloading operations. In other words, the 4,000-gallon design capacity applies to gasoline tank/tanks located at a bulk plant. Vapor recovery would be required if you are receiving gasoline into your bulk plant storage tank and when you're loading your truck at the loading rack. This rule does not affect the requirements for vapor recovery at your customer's tanks such as delivering gasoline to a 500-gallon skid tank on a farm.

Currently, the EPA only requires vapor recovery at bulk plants with actual daily gasoline throughput of 20,000 gallons or more. Lowering the gasoline threshold trigger from 20,000 gallons throughput to just 4,000 gallons design capacity would bring most bulk plants under federal vapor recovery requirements for the first time.

The Energy Marketers of America (EMA) is opposing this regulatory change because of the significant compliance costs it would impose on small business energy marketers. We need data measuring how many bulk plants would fall under the proposed rule if finalized. This data will allow EMA to calculate the approximate overall cost impact on energy marketers with gasoline bulk storage. This survey is designed to follow up on our prior survey to better define impact on our members in preparing for our meeting with EPA. **Please answer this survey in the link below by Friday, November 4th.**

**[CLICK HERE TO TAKE THE UPDATED SURVEY](#)**