

## **VANHOEYVELT Nele (ENV)**

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**From:** Alain LAMBROUT [Alain.LAMBROUT@developpement-durable.gouv.fr]  
**Sent:** mercredi 23 avril 2008 18:23  
**To:** ENV STAGE 2 VOC  
**Cc:** Cathy BIETH  
**Subject:** Consultation on Stage 2 Petrol Vapour Recovery at servicestations

**Attachments:** QUESTIONS TO WHICH RESPONSES ARE INVITED.doc



QUESTIONS TO  
WHICH RESPONSES ARE

Dear Sir,

In accordance on your preparatory work about a new legislation on "Stage II Petrol Vapour Recovery" which would aim to reduce VOC emissions associated with the refuelling of petrol cars at service stations.

As we also work in 2008 for a legislative proposal after the "Grenelle de l'Environnement" you will see our answers in the following document.

This proposal is the result of a consulting through a small working group which looked for a progress to take place in France to reduce those emissions of VOC.

Thank you for telling us what is the result of this requirement.

Kind regards

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du Développement durable  
et de l'Aménagement du territoire  
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## **QUESTIONS TO WHICH RESPONSES ARE INVITED:**

**1- Do you consider that the current lack of harmonisation of requirements for Stage 2 PVR controls across the EU has prevented the development of a single market for stage 2 PVR products and services?**

Yes for example, if harmonisation of requirements had stressed on better sucking ratios, it would have helped to develop different Stage 2 PVR techniques.

**2 - Would minimum/harmonised technical requirements at the EU level, improve the functioning of the single market for products and services related to stage 2 PVR equipment?**

Yes, the demand will help the development of the market.

**3 - Should Stage 2 PVR controls only be applied to new stations and those, which are substantially refurbished?**

Requirements for new stations or substantially refurbished stations have to be more strict than for the old stations but it doesn't mean that old stations shouldn't be concerned. It depends on where are the stations. Old stations close to houses should be controlled.

**4 - Should there be a minimum size/throughput of petrol below which there is no need to fit Stage 2 PVR controls to new and refurbished service stations?**

All new and substantially refurbished stations should be controlled.

**5 - Should Stage 2 PVR controls also be applied to existing stations?**

**If so, what is the minimum throughput/size of existing service station, which should be covered by any new legislation?**

The minimum could be a distribution of 1000 m<sup>3</sup> per year, indeed 500 m<sup>3</sup> and at the first m<sup>3</sup> when the station is closed to houses.

**6 - Should service stations be required to install automatic monitoring of stage 2 equipment to ensure that the equipment functions and the environmental benefits are delivered?**

New and substantially refurbished stations should be required to install automatic monitoring of stage 2 equipment. For the old ones, mechanic monitoring could be accepted with regular checking.

**7 - As part of ensuring good air quality for benzene in ambient air, should Stage 2 PVR equipment be fitted to all service stations built underneath or as part of residential dwellings irrespective of how much petrol they sell?**

As soon as stations are at less than 100 meters from houses, Stage 2 PVR equipment should be fitted.

**Responses should be sent to Duncan JOHNSTONE at the European Commission by no later than 25 April 2008: ENV-Stage-2-VOC@ec.europa.eu**