

**VANHOEYVELT Nele (ENV)**

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**From:** Consult [Consult@SEPA.org.uk]  
**Sent:** jeudi 24 avril 2008 13:33  
**To:** ENV STAGE 2 VOC  
**Cc:** Allan, Jane; Roebuck, Duncan  
**Subject:** Consultation on the Mandatory Introduction of Stage 2 Petrol Vapour Recovery Controls at Service Stations in the EU  
**Attachments:** ORG13-A2180 240408 EC.doc; ORG13-A2180 240408 EC Anx.doc

Please find attached SEPA's response to the above consultation.

SEPA has now set up a dedicated mailbox for consultations to ensure that these are dealt with in the most timeous way. Would you therefore be good enough to send any future consultations to SEPA via our designated mailbox [consult@sepa.org.uk](mailto:consult@sepa.org.uk). Many thanks.

<<ORG13-A2180 240408 EC.doc>> <<ORG13-A2180 240408 EC Anx.doc>>

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Our Ref: JM/JA/DR/FL  
ORG13-A2180

Your Ref:

Duncan Johnstone  
DG Environment (BU9 6/174)  
European Commission  
Rue de la Loi 200  
B-1049 Brussels  
Belgium

24 April 2008

(email): ENV-Stage-2-VOC@ec.europa.eu

Dear Mr Johnstone

**CONSULTATION ON THE MANDATORY INTRODUCTION OF STAGE 2 PETROL VAPOUR RECOVERY CONTROLS AT SERVICE STATIONS IN THE EU**

Thank you for providing the Scottish Environment Protection Agency (SEPA) with the opportunity to comment on the above consultation document. Our response is contained in the attached annex.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record. If you require further clarification on any aspect of this correspondence, please contact Duncan Roebuck, Policy Officer, SEPA Corporate Office, at the address shown below.

Yours sincerely



**Janice Milne**  
**Head of Environmental Policy**

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## **ANNEX**

### **5.1. 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?**

SEPA is not in a position to comment on whether 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.

### **5.2. 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?**

SEPA is not in a position to comment on whether minimum/harmonised technical requirements at the EU level would improve the functioning of the single market for products and services related to stage 2 PVR equipment.

### **5.3. Should Stage 2 PVR controls only be applied to new stations and those which are substantially refurbished?**

In order to achieve maximum environmental benefits, Stage 2 PVR controls should be applied to both existing and new stations. The "Analysis of Costs" report (COWI 2007), provided as recommended reading with the consultation, explores two policy options, with the "alternate case" (Stage 2 PVR controls applied to both old and new stations) offering almost double the reduction in VOCs compared to the "central case" (Stage 2 PVR controls applied only to new stations).

The best policy option is to have Stage 2 PVR controls apply to both new and existing stations so as to maximise VOC reductions and, in so doing, assist with meeting the objectives of the National Emissions Ceilings Directive (NECD) and the 6<sup>th</sup> Environmental Action Programme.

### **5.4. 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?**

Stage 2 PVR controls should not be applicable to new and refurbished stations below a certain minimum size/throughput.

It is unlikely that applying Stage 2 PVR controls at stations operating at a throughput below 500m<sup>3</sup>/year would contribute meaningfully to the overall reduction of VOCs and would likely present an excessive financial burden for these stations.

New stations and those undergoing major refurbishment above this size should be better placed to absorb the initial investment as well as the yearly operating costs of the Stage II PVR systems.

Stations below this size are likely to be located in less built up and rural areas where the impact of emissions is possibly less.

Stage 2 PVR legislation is currently in place in England, which excludes new stations below the 500m<sup>3</sup>/year threshold (petrol refuelling throughput). Legislation in place in Scotland for Stage 1 PVR controls excludes stations with a throughput less than 500 m<sup>3</sup>/year (volume petrol unloaded into stationary storage tanks). From the point of view of maintaining consistency within the UK and consistency with current Stage 1 PVR limits, this might be the preferred option for SEPA with respect to PVR II controls.

The implementation of Stage 2 PVR controls will complement current Stage 1 PVR controls, and will help increase the abatement of Volatile Organic Compounds at petrol stations. With both Stage 1 and Stage 2 systems working in tandem, greater environmental benefits will be achieved.

**5.5. 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?**

Once again, in order to achieve maximum environmental benefits, Stage 2 PVR controls should be applied to both existing and new stations.

SEPA is supportive of measures which secure the greatest degree of environmental benefit through reduction in emissions, whilst also ensuring the costs to industry of installation and regulation remain proportionate and fair. A minimum throughput should be chosen such that sites with the largest throughputs (who have a greater effect on emissions, but who are also in a position to absorb the associated costs of regulation) are required to install Stage 2 PVR controls. The minimum should be selected to avoid imposing unnecessary economic/regulatory burdens on those more marginal businesses.

Stage 2 PVR legislation is currently in place in England which excludes existing stations below the 3500 m<sup>3</sup>/year threshold. For consistency across the UK, the 3500 m<sup>3</sup>/year threshold is reasonable for existing services.

**5.6. 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?**

Automatic monitoring equipment should be a requirement if it is demonstrated that it will maximise both the performance of Stage 2 systems and the environmental benefits and achieve better overall cost-effectiveness. Automatic monitoring of stage 2 equipment may also be advantageous if it can reduce the requirement to test the system.

However, the use of automatic monitoring may not be practical with passive systems. Passive systems are presently provided for in the Defra Process Guidance Note 1/14(06) Unloading of Petrol into Storage at Petrol Stations.

**5.7. 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 a result of no such service stations operating in Scotland, to the best of SEPA's knowledge, we do not consider that we are able to comment on this question at present.

**General Comments:**

- Deadlines for implementation at existing stations are important given that cost effectiveness is improved if stations can be converted as part of a scheduled refurbishment. In this respect, a deadline for implementation at existing stations of 2020 (as explored as a scenario in COWI 2007) seems reasonable to balance the economic benefits as well as assisting with meeting the longer term environmental objectives to be realised by 2020.
- Both the reports providing background to the consultation (ENTEC 20005, COWI 2007) assume that Stage 2 PVR will be/ has been implemented across the whole of the UK.