



October 21, 2022

Important: Your Survey Responses Needed to Head off Costly EPA Bulk Plant Mandate

The EPA is proposing to require vapor balancing equipment at bulk plants with gasoline storage tanks. Under the plan, 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.

This is a huge change from existing policy. Currently the EPA requires vapor recovery at bulk plants with actual daily gasoline throughput of 20,000 gallons or more. However, the Biden administration plans to lower the gasoline threshold trigger from 20,000 gallons throughput to just 4,000 gallons. If passed this will mandate expensive vapor recovery retrofits at thousands of locations nationally.

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. If they are to be successful in fighting this, they need data from Virginia members measuring how many bulk plants would fall under the proposed rule if finalized. This data will allow EMA to calculate the financial impact this will have on energy marketers with gasoline bulk storage.

We are asking for you to take five minutes to fill out [this survey](#) by **Friday, November 4**.