
Stage II or Comparable Measures Requirement in the OTR

**Stage II Vapor Recovery Meeting
Manchester, NH
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Stage II Requirements in the OTR

Two separate requirements:

- Sec. 182(b) (3) – nationwide Stage II requirement for serious and above areas.
- Sec. 184(b) (2) – OTR-wide requirement for all areas in the OTR, both attainment and nonattainment, to adopt Stage II or alternative measures capable of achieving emissions reductions comparable to Stage II.

Section 184(b)(3) Requirement

- Sec. 184 required EPA to conduct a study to identify control measures capable of achieving emissions reductions comparable to Stage II in the OTR.
- Within 1 year of completion of the study, States in the OTR were required to revise their SIPs to include Stage II or comparable measures.
- Because serious and severe areas are also subject to the sec. 182 Stage II requirement, they could not, at that time, take advantage of the flexibility provided by the sec. 184 requirement.

Stage II Comparability Study

- EPA issued study in January 1995.
- Time frame for assessing comparability --1999.
- Only measures not already prescribed by CAA can be considered for comparable measures (ORVR can not be considered).
- Evaluated enhanced I/M, reform gas, LEV, more stringent controls on stationary sources.
- Allows NOx substitution
- Provides option for OTR States to conduct independent comparability analyses.

Sec. 202(a)(6) Onboard Vapor Recovery

- Allows EPA to revise or waive the sec. 182 nationwide Stage II requirement after EPA determines that ORVR is in widespread use.
- Does not give EPA the authority to waive or revise the sec. 184 OTR Stage II or comparable measures requirement.
- Once serious and severe areas are relieved of the sec. 182 Stage II requirement, they still must address the sec. 184 requirement.

Phasing Out Stage II in the OTR

- Need mechanism to address the sec. 184 Stage II or comparable measure requirement.
- Potential option -- conduct new comparability analyses using future baseline for comparability when Stage II is providing fewer emissions reductions.