

**Stephen Hoffman**

**From:** Worth, Joshua <joshua.m.worth@wawa.com>  
**Sent:** Wednesday, December 22, 2021 1:32 PM  
**To:** IRRC  
**Subject:** Comments on IRRC# 3266 - Regulation #7-525: Control of VOC Emissions from Gasoline Dispensing Facilities (Stage I and Stage II)

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IRRC,

Below are my comments on IRRC# 3266 - *Regulation #7-525: Control of VOC Emissions from Gasoline Dispensing Facilities (Stage I and Stage II)*:

The proposed requirement for ECO Nozzles will have a negative impact on consumers and facility owners within the designated counties and create significant safety concerns. The ECO nozzle is built with an Interlock System that makes it difficult to actuate compared to the current conventional nozzles. This will lead to frustration on the customer's end, who will then refuel only at facilities that do not have the ECO Nozzles. This will negatively impact the facility owners in the designated counties that border counties where the ECO nozzle is not required. There is a precedent for this in the early 90's when Stage II Vapor Recovery was first required in these same counties in the Philadelphia and Pittsburgh areas. Facility owners that complied early with the Stage II requirements installed Balance nozzles because they were the only nozzles readily available on the market. These Balance nozzles had a very large boot over the spout that required a good deal of strength to lock into the vehicle's gas tank. This caused many customers to only refuel at facilities that did not have Stage II Vapor Recovery. These were the facilities that did comply right away with the Stage II requirements or facilities in neighboring counties that Stage II was not required. For the facility owners that waited to install Stage II, a much more user friendly nozzle was then available...the Vacuum Assist nozzle. Customers flocked to these facilities with Vacuum Assist nozzles instead of the facilities that complied earlier with the Balance nozzles.

None of the neighboring self-serve states require ECO nozzles for this reason. NJ requires them, but they are a full-serve state. Fuel attendants in NJ are the only users of the ECO nozzle and can be trained on how to operate the Interlock System.

The ECO nozzles also have a history of getting stuck in vehicles, specifically Dodge trucks. We have had multiple occasions of the local Fire Department having to come out and take apart the ECO nozzle to get it out of the customer's gas tank at our NJ stores. Fortunately, there are fuel attendants in NJ that recognize the issue and can dispatch the fuel equipment repair vendor. The customer still has had to wait several hours for the nozzle to be removed. In a self-serve state, this will be a major safety concern. Customers pumping their own fuel might resort to dangerous methods to try to dislodge an ECO nozzle from the vehicle. The NJ Department of Environmental Protection even went against their Air Regulations and allowed facilities to designate one dispenser that does not have an ECO nozzle in order to refuel Dodge vehicles.

I hope the IRRC takes my comments in consideration as there will be significant impact on customers and facility owners.

Thanks,

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