

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Monday, September 28, 2020 9:13 AM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Control of VOC Emissions from Gasoline Dispensing Facilities (Stage I and Stage II) (#7-525)

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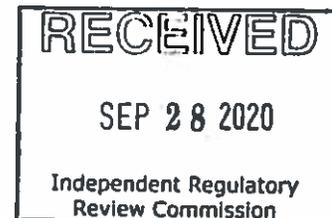


Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Control of VOC Emissions from Gasoline Dispensing Facilities (Stage I and Stage II) (#7-525).

Commenter Information:

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The Wills Group Inc and SMO Inc (sstookey@twgi.net)
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Comments entered:

My only comments on the proposed Stage I and Stage II rulemaking are to express my concerns about the requirement for Enhanced Conventional Nozzles (ECO) in Chapter 129.61(k)(2). Most self-service states are not requiring them due to the difficulty for the customer to refuel. The ECO Nozzles have an interlock system that makes it very difficult for customers to operate. Our current nozzle manufacturer supplies Dripless Nozzles with the same interlock system in California and they have a representative stay on site for a week to train customers on how to operate the nozzles. That is how challenging these nozzles can be to operate. One effect will be customers deciding to refuel their vehicles in counties or other states that do not require ECO Nozzles. This same effect on business was felt by retailers in the early 90's who were early to comply with Stage II and installed Balance nozzles. They lost customers to retailers in non-Stage II Counties and retailers who waited to comply. The stations that waited to comply then had the option of the much user-friendlier Vacuum Assist Nozzles.

NJ is the only neighbor state that requires the ECO Nozzle, since they are full serve for gasoline and the customer does not touch the nozzle. There have already been 3 instances of the nozzle getting stuck in the gas tank of the customer's vehicle. This has required the dispatch of the fuel vendor, and in one instance the local Fire Department, to disassemble the nozzle in order to

remove it from the gas tank. The customers were stuck on site for 3-4 hours until the nozzle was freed from their vehicles. Our fuel associates have also reported a significant amount of other operational issues. These include the nozzle spraying fuel after it appeared to have shut off, the nozzle constantly shutting off, and having to pull the nozzle up and holding it in order for it to dispense. This is very concerning from a safety and environmental perspective.

Though emission factors were used to calculate how many VOC emissions will be reduced by less dripping, the emission factor for spillage does not account for nozzles with unreliable automatic shutoff mechanisms. The first ECO nozzle to receive CARB approval is from a manufacturer we had to switch away from 15 years ago because of the frequency of spills due to the automatic shutoff failing. This causes a much larger gasoline spill, and subsequent VOC and HAP emissions, than a couple of drips from the nozzle spout.

Besides the loss of customers, another economic impact on tank owners is that ECO Nozzles cost 8 times the cost of a conventional nozzle (and 3 times the cost of a Stage II nozzle).

In summary, I agree with all of the proposed changes to these regulations except for the ECO Nozzle requirement. There is a strong fear for safety, environmental impact, and overall customer frustration in a self-serve state like PA.

Please contact me with any questions.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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