

Stephen Hoffman

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From: ecomment@pa.gov
Sent: Friday, October 30, 2020 6:34 PM
To: Environment-Committee@pasenate.com; IRRRC; 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:

Tim Hurlocker
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Comments entered:

Costco is already converting all our US gas stations, including our stations in PA, to the new "dripless" nozzle standard. We have deployed VST, OPW, and Husky versions in various states. In Pennsylvania we use the OPW 14E model.

We started testing dripless nozzles two years ago, and made our decision to install them at all stations last year. Costco gas stations feature certified attendants at the fuel islands at all times, so we know from their feedback that these nozzles significantly reduce minor drips and spills. That is the primary reason we made the switch, as the cost per nozzle is substantially more with the ECO features.

Costco's methodology is to replace conventional (non-Stage II) nozzles with the new ECO nozzles as the old ones wear out, to preserve our equipment investment. We estimate that about 40% of our US hose points currently feature the new dripless nozzles.

We have had some customers complain about the boot interlock, especially in areas that have not previously mandated a booted nozzle. Our attendants overcome most of those complaints at the station level, but we have also had the manufacturer's reps visit some stations to help with

the transition. These issues are similar to those encountered with Balance Stage II booted nozzles, which is one reason why we used Assist before ORVR rendered Stage II obsolete.

Some vehicles cause more trouble than others, based on the fuel port design. There are certainly some difficulties for some customers getting used to the booted interlock dripless nozzle.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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