



**Illinois Petroleum Marketers Association  
Illinois Association of Convenience Stores**

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WILLIAM J. FLEISCHLI  
EXECUTIVE VICE PRESIDENT

BY EMAIL

July 8, 2013

Clerk of the Illinois Pollution Control Board  
JRTC  
100 W. Randolph Street, Suite 11-500  
Chicago, Illinois 60601

Re: Comments on Vapor Recovery Rules R13-18 (Rulemaking – Air)

Dear Clerk:

I am the Executive Vice President of the Illinois Petroleum Marketers Association and the Illinois Association of Convenience Stores (collectively “IPMA”), joint trade associations with 300 members who own or supply 3500 gasoline stations and convenience stores in Illinois. On behalf of those members, I submit the following comments.

The IPMA recommends that the Illinois Pollution Control Board and the Illinois EPA please reconsider the time frame of the proposed changes to the decommissioning of stage II vapor recovery. Although the proposed changes are an important step forward, we feel it would be of benefit to the State of Illinois and its citizens if this time frame in the rule could become effective immediately and not have to wait until January 1, 2014. We feel this change would have both a positive economic effect as well as a positive environmental impact for the State of Illinois.

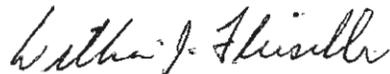
There are approximately 5 months left before the proposed regulation change goes into effect. Over the next 5 months marketers will hold off, or limit the investment in building new sites and upgrading existing sites. There are several marketers with stations in Illinois that market in multiple states. Many of them are electing to invest money in developing new stations in other states. By doing this they can enjoy a savings of about 50k per site. This is the typical average cost when stage II vapor recovery systems do not need to be installed. Each station built outside of Illinois is a loss of about 2.5 to 3 million dollars spent in Illinois. That is the average cost of construction per site in the impacted counties. This is a loss of jobs and revenue to the state and its citizens. The companies that build these stores and provide the equipment and supplies will be greatly impacted by the reduction in activity during this window of time. Many station owners and marketers would also like to change out their existing dispensers to non-stage II dispensers.

They too have to hold off until January 1, 2014. This is additional loss of economic and employment opportunity to the State and its citizens. Some marketers may try to band aid old equipment just to keep it working until they can upgrade to the less expensive non stage II equipment. Running older equipment without proper maintenance will not contribute to the optimal goal of vapor recovery and prevention of minor product releases.

It is understandable that the Pollution Control Board and IEPA must take into consideration the guidelines set forth by the Federal EPA on stage II decommissioning. We recognize the data used from the MOVES simulator (Motor Vehicle Emission simulator) helps identify the threshold of where the onboard canisters and vapor assist systems create a problem with tank over pressurization and air quality back slide. We feel that the building or upgrading of 10 or 20 additional stores should not create that big of a loss in air quality to be a problem. That would be a change in less than 1 percent of the 2420 stations in the impacted area. In fact we feel there are positive offsets to building a new store. These stores are built with more environmental friendly, and energy efficient equipment. LED lighting is just one that is recognizable to the consumer. These newer sites are also built with fueling systems that can be compatible to offer bio fuels. In fact it is at the new stores that bio diesels and E85 are sold. These cleaner fuels would help offset the immediate possible air quality loss. It would also bring long term insurance to better air quality through those products. Currently due to this waiting period we are losing these new sites with those cleaner fuels desired under the Renewable Fuels Standard 2 and the Energy Independence Act. Illinois is currently losing some of this opportunity.

We appreciate the opportunity to comment on the proposed amendments. We do feel it would it better serve the interest and needs of the citizens of Illinois to allow decommissioning prior to January 1, 2014.

Sincerely yours,



William J. Fleischli  
Executive Vice President