



Illinois Petroleum Marketers Association Illinois Association of Convenience Stores

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WILLIAM J. FLEISCHLI
EXECUTIVE VICE PRESIDENT

BY EMAIL AND U.S. MAIL

October 11, 2013

Clerk of the Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

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

Dear Clerk:

On July 8, 2013, I filed comments on behalf of the Illinois Petroleum Marketers Association / Illinois Association of Convenience Stores (collectively "IPMA") on the proposed Vapor Recovery Rules 13-18. On September 9, 2013, ARID Technologies, Inc., ("ARID") filed comments by email on the proposed rules, more than two months after the date for comments established by the Hearing Officer. On September 30, the Hearing Officer rejected opposition to ARID's comments filed by the Illinois Environmental Protection Agency and IPMA and allowed ARID's comments into the record. The following comments are in response to ARID's comments.

The IPMA is familiar with the type of system being proposed by ARID. ARID is one of several manufacturers that are an option if a Stage II site wants to make the investment to make their site ORVR compatible. When the IEPA drafted the revised S.I.P., it had already taken into consideration the option of upgrading existing Stage II sites to be ORVR compatible. ARID does not offer any new game-changing technology. Its system is just one of several options to make an existing site with Stage II compatible with ORVR. As with the other existing upgrade options, it would be an expensive investment for the site to make this change. Once done the site would have additional costs to maintain the ARID system. Keeping their system Stage II active as ORVR compatible would also keep their maintenance costs higher as documented in your drafted rulemaking. Additionally Stage II systems are only certified and compatible for up to E10 fuel. This is also a great limitation to the State and marketers that want to offer higher bio fuel options. ARID missed the filing deadline to submit comments on the proposed rulemaking. ARID system does not result in decommissioning Stage II recovery, which the USEPA has approved. ARID's system only modifies existing Stage II equipment.

As we indicated in our July 8 comments, Illinois marketers are delaying investment in building new sites or upgrading existing ones until the new rules are in place. Delaying the course of the proposed rulemaking beyond the planned January 1, 2014, implementation date in order to review ARID's product would be unproductive and a disservice to the citizens of Illinois.

Thank you for the opportunity to present these comments.

Sincerely yours,

A handwritten signature in black ink, appearing to read "William J. Fleischli".

William J. Fleischli
Executive Vice President

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that I have served the attached Comments of the Illinois Petroleum Marketers Association/Illinois Association of Convenience Stores (IPMA/IACS) upon the following persons:

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
(By e-mail and U.S. Mail)

Thomas Davis, Bureau Chief
Environmental Bureau
Office of the Attorney General
500 South Second Street
Springfield, Illinois 62706

Richard R. McGill, Jr.
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601

Office of Legal Services
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, Illinois 62702-1271

Ted Tiberi
ARID Technologies Inc.
323 S. Hale Street
Wheaton, Illinois 60187

Kent E. Mohr, Jr., Assistant Counsel
Illinois Environmental Protection Agency
1021 N. Grand Avenue, East
P.O. Box 19276
Springfield, Illinois 62794-9276

By mailing a true thereof in an envelope duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois on October 11, 2013.

Illinois Petroleum Marketers Association/
Illinois Association of Convenience Stores

Dated: October 11, 2013

112 W. Cook Street
Springfield, Illinois 62704
217/789-7800

By: 
Steven E. Wermcrantz
Its Attorney