



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

WM. R. DEUTSCH BUILDING • 112 WEST COOK STREET
P.O. BOX 12020 • SPRINGFIELD, ILLINOIS 62791-2020
PHONE: 217/544-4609 • FAX: 217/789-0222

WILLIAM J. FLEISCHLI
EXECUTIVE VICE PRESIDENT

September 17, 2013

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SEP 18 2013
STATE OF ILLINOIS
Pollution Control Board

Mr. Richard R. McGill, Jr., Hearing Officer
Illinois Pollution Control Board
1021 North Grand Ave E
Springfield, IL 62702

Re: R13-18 Vapor Recovery Rules: Amendments to 35 ILL. ADM. Code Parts 201, 218, and 219

Dear Mr. McGill:

The Illinois Petroleum Marketers Association (IPMA) opposes the Illinois Pollution Control Board's acceptance of the comment submitted by Arid Technologies on September 9, 2013, a full two months after the public comment period deadline of July 8, 2013. Acceptance of this comment, and subsequent responses to it, may delay the action on the proposed rulemaking beyond the proposed January 1, 2014 date that the Illinois Environmental Protection Agency has proposed to rescind the Stage II vapor recovery requirement for new gasoline dispensing facilities and when existing operations may begin decommissioning their vapor recovery equipment. Delaying the implementation of this action will result in additional expenses to gasoline dispensing facility owners either in the delay in opening new gasoline refueling facilities, many of which have been on hold in anticipation of the proposed rule revision, or in the continued maintenance expenses for existing stations with Stage II equipment.

The IPMA urges the Board to disregard the late comment and proceed as expeditiously as possible to adopt the proposed revisions. In addition to reducing the station operating expenses, the decommissioning of Stage II equipment in a timely manner will, as demonstrated in the Illinois EPA's testimony, reduce excess emissions from the use of incompatible equipment, thereby improving air quality. Thank you.

Sincerely yours,

Bill Fleischli
Executive Vice President