

**Therriault, John**

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**From:** Ted Tiberi <ttiberi@aridtech.com>  
**Sent:** Monday, September 23, 2013 12:14 PM  
**To:** Therriault, John  
**Cc:** McGill, Richard  
**Subject:** Re: Response to Mr. Mohr's Request  
**Attachments:** IL EPA Data from MOVES.xlsx; Stage II, ORVR and Emissions Reduction Options 20 DEC 2012 with Executive Summary.pdf

PC#5

Hi John,

After reviewing materials from the on-line case summary for R2013-018, I would like to submit the following additional comments and materials.

I have attached a data table and spreadsheet which plots the ORVR Only and ORVR + Stage II (with IEE) emissions (Tons/Day) for the Chicago Nonattainment Area per the data submitted by IL EPA in their Exhibit 2, page 4 filing of 28 May 2013 (We simply put IL EPA data into spreadsheet and graphical form). Please note that the curves in this graph closely approximate the curves in ARID's previously submitted Chart 3, on page 7 of "Stage II & ORVR and Associated Emissions...." White Paper, dated 18 DEC 2012 (The units on the y-axis are different, but the relative slopes are of particular note). The key point is then to consider Chart 4, on page 8 of the same ARID submittal, which shows no crossover of the ORVR Only and ORVR + Stage II (with IEE) curves for the case where Storage Tank Breathing Losses are considered. (STBL not equal to zero). It's clear that the MOVES model does not incorporate the impact of storage tank breathing losses; and this oversight is a very significant error. In addition, in the testimony of Mr. Burkhardt, p. 17; lines 6-8; (Transcript from 8 May 2013 Hearing), he makes a reference to the year 2014; where the "ORVR-only line crosses the ORVR + Stage II line". As seen in our White Paper, Chart 4 and text, page 3, 2nd Paragraph; ARID shows clearly that these lines do not intersect when the STBL are properly accounted for in the emissions inventory. The ORVR + Stage II (with IEE) emissions are less than the ORVR Only emissions throughout the entire time frame - up to and including 2022. Removal of Stage II with sole reliance on ORVR, will INCREASE rather than DECREASE emissions.

I have re-attached the White Paper which was previously submitted as well.

Best Regards, Ted

Ted Tiberi  
ARID Technologies, Inc.  
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Wheaton, IL 60187 USA  
office: 630.681.8500  
mobile: 708.557.0297  
[ttiberi@ARIDtech.com](mailto:ttiberi@ARIDtech.com)

On Sep 20, 2013, at 4:19 PM, Therriault, John wrote:

Ted,

Electronic is OK.

John

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**From:** Ted Tiberi [mailto:ttiberi@aridtech.com]  
**Sent:** Friday, September 20, 2013 4:16 PM  
**To:** Therriault, John  
**Cc:** McGill, Richard  
**Subject:** Re: Response to Mr. Mohr's Request

Hi John,

Many thanks. Is electronic format ok if I decide to file any additional reply within 14 days ?

Please advise.

Have a good weekend. Regards, Ted

On Sep 20, 2013, at 4:03 PM, Therriault, John wrote:

Ted,

Consider your response to Mr. Mohr's request as electronically filed as of today.

Regarding response to Mr. Mohr's Request, you have 14 days from when you received a copy of his document to file a reply or replies. Anything after that may or may not be taken into consideration by the Board.

John

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**From:** Ted Tiberi [mailto:ttiberi@ARIDtech.com]  
**Sent:** Friday, September 20, 2013 3:12 PM  
**To:** Therriault, John  
**Cc:** McGill, Richard  
**Subject:** Fwd: Response to Mr. Mohr's Request

Sorry, typo on point 1, below; 39 days late.

Regards, Ted

Begin forwarded message:

**From:** Ted Tiberi <[ttiberi@ARIDtech.com](mailto:ttiberi@ARIDtech.com)>  
**Subject:** Response to Mr. Mohr's Request  
**Date:** September 20, 2013 3:00:06 PM CDT  
**To:** [richard.mcgill@illinois.gov](mailto:richard.mcgill@illinois.gov)  
**Cc:** John Therriault <[john.therriault@illinois.gov](mailto:john.therriault@illinois.gov)>

Dear Mr. McGill,

Please advise if I can provide any additional information on my submittal below.

Regards, Ted

Ted Tiberi  
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Begin forwarded message:

**From:** Ted Tiberi <[ttiberi@aridtech.com](mailto:ttiberi@aridtech.com)>  
**Subject:** Re: Additional Submittal for ARID  
**Date:** September 20, 2013 2:55:54 PM CDT  
**To:** "Therriault, John" <[John.Therriault@illinois.gov](mailto:John.Therriault@illinois.gov)>

Hi John,

Received a copy of Kent Mohr's filing yesterday.

Wow; if IL EPA directed even a small portion of their energy to investigating the substance of our submittal as opposed to vigorously attempting to disallow our comments; perhaps we'd all be much better off.

I suspect ARID is likely the lone dissenter on the proposed action to allow removal and decommissioning of Stage II vapor recovery. I hope the IL Pollution Control Board can allow for a democratic process, and consider our technical comments and objective data in this matter.

I am a chemical engineer, not an attorney, but I would like to respond to Mr. Mohr's letter as follows:

1. Yes; our comments were submitted late, about 9 days. We were unaware of the process taking place in Illinois.
2. The reason we submitted electronic information was to a.) expedite our submittal and b.) properly forward a video clip (no way to send a video clip in "hard copy")

3. Relative to expedited review; the sooner Stage II controls are removed, the sooner the refueling emissions will be **increased** in State of Illinois; the sooner Stage II vapor recovery is enhanced, the sooner gasoline vapor emissions will be **decreased** in Illinois
4. New Regulatory Program - not our intent; simply stating a means to enhance an EXISTING program as an alternative to **ABOLISHING** such a program.
5. Perhaps Mr. Mohr's filing should be disallowed since he dated the submittal 12 August 2013; which is incorrect. (we submitted our comments on 9 Sept)

We respectfully ask the Hearing Officer to allow our public comments and to provide ARID with an opportunity to further discuss our technical rationale and objective data on this important matter.

All the Best, Ted

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On Sep 11, 2013, at 1:46 PM, Therriault, John wrote:

Ted,

We don't keep email addresses, but I do have their phone numbers.  
Tom Davis at Attorney General's office is 217/782-9031  
Kent Mohr of IEPA is 217/782-5544 (general number)  
Department of Natural Resources, Legal Services, is 217/782-1809.

John

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**From:** Ted Tiberi [mailto:[ttiberi@aridtech.com](mailto:ttiberi@aridtech.com)]  
**Sent:** Tuesday, September 10, 2013 11:54 AM  
**To:** Therriault, John  
**Subject:** Re: Additional Submittal for ARID

Hi John,

Many thanks for your confirmation and recommendations.

Are there email addresses available for the 3 service list entries ?

Please advise, and Best Regards, Ted

ps travelling on East Coast this week.....

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On Sep 10, 2013, at 11:48 AM, Therriault, John wrote:

Ted,

Received your addition to your submission of yesterday and will docket it as an addendum to PC#4 (your 9/9/13 submission).

Two points: (1) you need to send a copy of all you've submitted to the persons on the Service List, available on our website, and (2) as long as the material is docketed, it is available for consideration by Board members, but I can't confirm whether or not your materials are incorporated into the decision process before a Board order is issued (no specific date of issuance).

Good luck,

John

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**From:** Ted Tiberi [mailto:[ttiberi@aridtech.com](mailto:ttiberi@aridtech.com)]  
**Sent:** Tuesday, September 10, 2013 11:31 AM  
**To:** Therriault, John  
**Subject:** Additional Submittal for ARID

Hi John,

As a follow-on to my submittal yesterday on R2013-018, I wanted to also submit the attached Attribute Matrix. I will present this matrix at a meeting of the OTC (Ozone Transport Commission) on Thursday of this week in Washington, DC.

Please advise if I may provide any clarification or further information on the material I've submitted thus far. Can you please confirm if the material is allowed late into the proceeding ?

Best Regards, Ted

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## Stage II & ORVR and Associated Emissions of Gasoline Vapor State of Connecticut Gasoline Dispensing Facilities

Ted Tiberi, Luke Howard, Mike Heffernan, ARID Technologies, Inc.

18 December 2012  
[www.ARIDtech.com](http://www.ARIDtech.com)

### **Executive Summary**

Gas stations; also called gasoline dispensing facilities (GDF) typically store fuel in underground tanks (called UST's). The gasoline is dispensed through nozzles to the motorist's vehicle tank. When the vehicle tank is refilled, the liquid gasoline entering the tank will displace a volume of vapor phase gasoline; for example, if 10 gallons of fuel are pumped into the vehicle tank, approximately 10 gallons of vapor will be displaced. This displaced vapor is comprised of air and hydrocarbons. Some of the hydrocarbons (also called VOC's – Volatile Organic Compounds) contain HAP's (Hazardous Air Pollutants), and direct exposure to some HAP's is known to increase risks for cancer; for example benzene. In addition, the emissions of VOC's to the atmosphere are ozone precursors; where ozone formation in the lower atmosphere is detrimental to human health.

To reduce emissions of VOC's and HAP's to humans and the environment, Stage II vapor recovery systems were put in place. The Stage II systems use a small vacuum pump located in the fuel dispenser along with a coaxial hose (hose within a hose) arrangement to allow liquid gasoline to flow from the UST's to the vehicle and at the same time to collect displaced vapors from the vehicle tank and then direct these collected vapors back to the UST's.

The operation of Stage II vapor recovery provides three key benefits:

- Reduced health risks to motorists as direct exposure to benzene and other HAP's is avoided
- Reduced impact of hydrocarbon emissions to the environment as the displaced vapors are captured and directed back to the UST's
- Operational savings to the GDF owner/operator since the recovered vapors from the motorist's vehicle tank are used to blanket the liquid gasoline stored in the UST's. By keeping the hydrocarbon vapor concentration at elevated levels in the vapor space of the UST's, the natural phenomena of evaporation of liquid gasoline to vapor phase gasoline is avoided. In this manner, there is a kind of linked or interdependency between the Stage II system and the UST's
  - The vapor space above the liquid gasoline has a hydrocarbon vapor concentration that attains some "equilibrium level",

where the rate of liquid evaporating to vapor equals the rate of vapor condensing to liquid. When the equilibrium hydrocarbon concentration is altered by ingestion of atmospheric air, liquid fuel will evaporate to increase the hydrocarbon concentration back up to the original equilibrium level. During this process of "re-saturation" of the UST vapor space, the storage tank pressure will increase and excess volume of hydrocarbon vapors will be exhausted from the UST vapor space (One gallon of liquid gasoline evaporates into 520 gallons of vapor phase gasoline, at 40% hydrocarbon concentration). This storage tank breathing loss is the primary reason that very large above ground storage tanks at bulk gasoline terminals, refineries and distribution facilities use so-called "floating roof tanks"; these tanks use a roof that literally floats on the surface of the gasoline, therefore eliminating any vapor space above the liquid, to subsequently eliminate the breathing loss dynamics.

A debate emerged between the Auto and Oil Industries as to what party should be responsible for controlling the refueling losses. The Oil Industry prevailed and the Auto industry was forced to equip new vehicles with the so-called ORVR (On Board Refueling Vapor Recovery) system. The ORVR system is primarily comprised of an activated carbon canister, which captures the displaced vapor during refueling. As the motorist drives down the highway, the carbon canister is regenerated by a portion of engine intake air "back flushing" through the carbon canister, where the hydrocarbons are desorbed and burned as fuel in the engine. Since the ORVR systems are not retrofit to vehicles, but rather incorporated into new vehicle production, the population of ORVR equipped vehicles has been slowly increasing throughout the United States. Passenger vehicles were first equipped in 1998, with 40%, 80%, and 100% of new vehicle production having ORVR systems in 1998, 1999 and 2000, respectively.

At the time of the Oil Industry "victory", the oil industry wanted to remove the Stage II hardware from GDF. Since only a low proportion of vehicles had ORVR systems in 1998, immediate removal of the Stage II systems was not possible. However, the oil industry negotiated for a timed "phase-out" of the Stage II hardware in conjunction with a greater proportion of ORVR equipped vehicles in the fleet. The notion of widespread use (WSU) was discussed between USEPA and the Oil Industry; whereby a certain population of ORVR equipped vehicles would trigger the removal of Stage II vapor recovery controls. The rough idea formulated at that time (without in-depth study or understanding) was that after a threshold population of ORVR vehicles was attained in the fleet, the use of overlapping controls (Stage II at the GDF and ORVR within the vehicles) would be counterproductive since the emissions controlled by ORVR Alone would exceed the emissions controlled by either Stage II Alone or Stage II in conjunction with ORVR. However, in practice, these fundamental assumptions are not accurate or true. For the first assumption regarding the



refueling emissions controlled by ORVR Alone in comparison to Stage II Alone; we show in our CHART1 of this report, that there is a cross-over for the ORVR Alone curve with the Stage II Alone curves; however, in practice Stage II is never able to be used "Alone" as there will always now be some proportion of ORVR equipped vehicles in the fleet. Thus, our CHART2 shows that the combination of Stage II + ORVR provides the lowest emissions in comparison to ORVR Alone over the entire interval presented; which incorporates increased proportion of ORVR vehicles in the fleet. Basically, the presence of the Stage II system acts as a "backstop" to provide a chance to capture the refueling emissions from non-ORVR vehicles. Therefore the combined Stage II + ORVR efficiency will always be higher than ORVR Alone.

For the second assumption from above, regarding the total emissions controlled by ORVR Alone in comparison to Stage II in conjunction with ORVR; we show in CHART3 that there is a cross-over for the ORVR Alone curve with the Stage II + ORVR curves; however, this ORVR Alone curve is generated without including any storage tank breathing losses. These storage tank-breathing losses are the category of emissions described above under the "Operational Savings" section of this Executive Summary. Since Stage II is removed under the ORVR Alone option, the UST's are not able to use any of the hydrocarbon vapors displaced from the motorist's vehicle tank; as these vapors are now adsorbed on the activated carbon used in the ORVR system. As such, the UST's will ingest atmospheric air to offset the vacuum developed as product is withdrawn and directed to vehicles. The interdependency of Stage II and the UST's is now interrupted, and the ingested air will cause storage tank breathing losses to occur. The dynamics of this situation have been overlooked or ignored by the Regulatory Community, Lawmakers, and other Stakeholders. When the storage tank breathing losses are properly accounted for and added back to the emissions inventory, the ORVR Alone curve never crosses over the ORVR + Stage II curves, and therefore the ORVR Alone case never provides for the maximum amount of emissions reductions. The fact that Stage II systems "solve two problems simultaneously" by recovering displaced vapors from the vehicle tank AND using these recovered vapors to blanket the UST vapor space and thereby avoid subsequent evaporation of fuel and storage tank breathing losses has not been understood.

A quick word about IEE, Incompatibility Excess Emissions. IEE have been recognized by various Stakeholders'; whereby the higher proportion of ORVR equipped vehicles will cause higher amounts of ambient air to be ingested by the Stage II systems. This greater quantity of air will dilute the hydrocarbon vapor space, and cause liquid fuel to evaporate and eventually be exhausted from the UST combined vapor spaces. When the IEE are properly quantified, there is a crossover with the ORVR Alone case with the Stage II + ORVR Case (Please see CHART5c); when a vapor processor is not used to actively manage the UST pressure. When a vapor processor such as the ARID Permeator is employed, the IEE emissions are reduced by 99.3%, and this is clearly the optimum configuration. For clarity, ORVR Alone storage tank breathing losses and Stage II + ORVR IEE are generated by a

similar mechanism. Storage tank breathing losses are caused by pure air ingested through the vent line, and IEE emissions are generated by a combination of air and hydrocarbons pumped back into the UST by the Stage II system, while refueling an ORVR equipped vehicle.

### **Widespread Use and General Overview**

In general, vapor emissions at gasoline dispensing facilities (GDF) are comprised of **refueling emissions** and **storage tank emissions**. In turn, refueling emissions are generated at the nozzle/vehicle interface and at the outlet from the carbon canister used on the ORVR systems. The storage tank emissions are comprised of vent line emissions through the pressure/vacuum valve (p/v valve) and fugitive emissions through various point sources within the vapor containing hardware; where the vent & fugitive emissions are a function of storage tank pressure.

At a GDF using a combination of Stage II and ORVR, the storage tank vent and fugitive emissions comprise the so-called "IEE" or incompatibility excess emissions. The IEE emissions are generated from the combined storage tanks due to air ingestion, dilution of the hydrocarbon concentration within the vapor spaces of the tanks, and subsequent evaporation of liquid gasoline to increase the vapor space concentration back to the original "equilibrium" value. As ORVR penetration increases with time, the IEE will increase due to leaner vapors (more air) being returned to the storage tank vapor space, which in-turn triggers the evaporative process described above.

With non-Stage II and ORVR alone, air ingestion via Stage II vacuum pumps located in the fuel dispensers is eliminated, however ***air will still be ingested into the storage tanks through the vent line.*** During busy refueling periods, the negative cracking pressure of the p/v valve is quickly reached since the volume of fuel removed from the tank will draw down the level of fuel and this "piston effect" will create a vacuum in the tank vapor space. Typically, the air ingestion will occur when a negative pressure of -6 to -8 inches of water column is reached. The ambient air entering the system will cause the liquid fuel in the tank to evaporate (similar to IEE mechanism), and when the GDF experiences slower pumping periods or when the GDF is closed for business, the combined storage tank pressure will quickly increase. Let's refer to these emissions as "*Storage Tank Breathing Losses*".

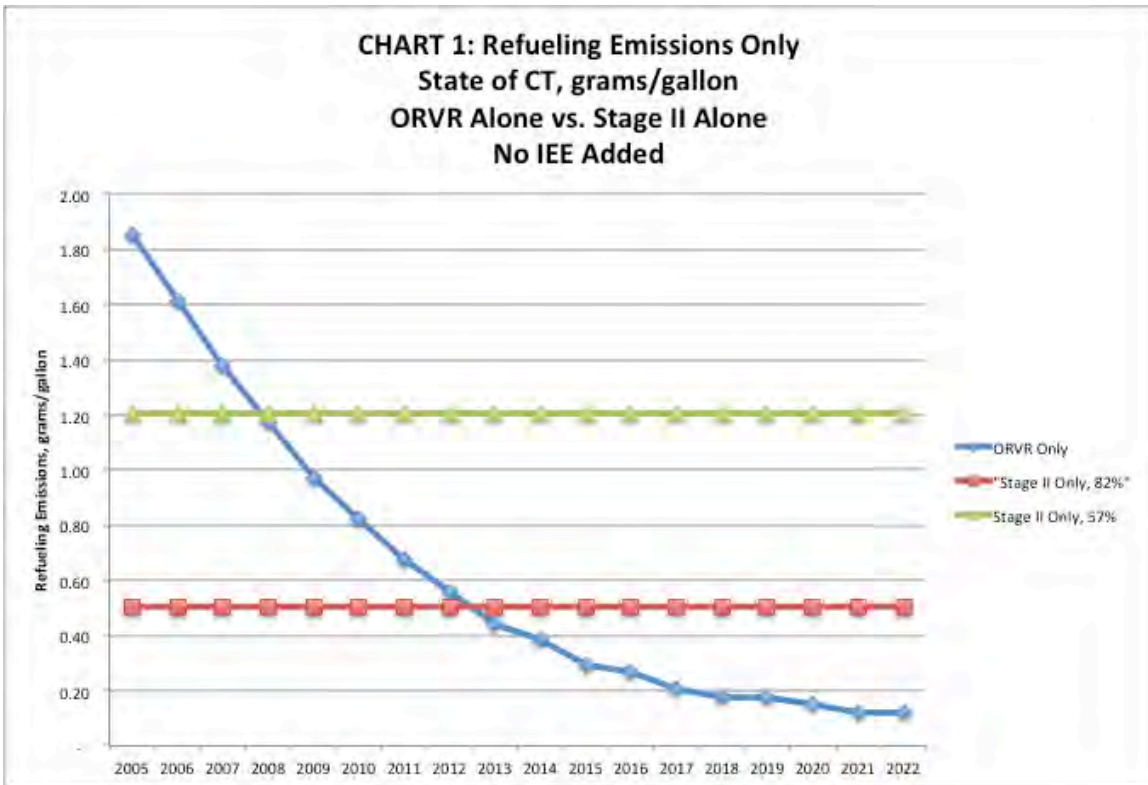
To summarize, when Stage II and ORVR are used together at a GDF, the storage tank emissions are called IEE (Incompatibility Excess Emissions). When Stage II is not present at the GDF, and only ORVR is employed, the storage tank emissions are called Storage Tank Breathing Losses (STBL).

### **ORVR and Stage II Emissions**

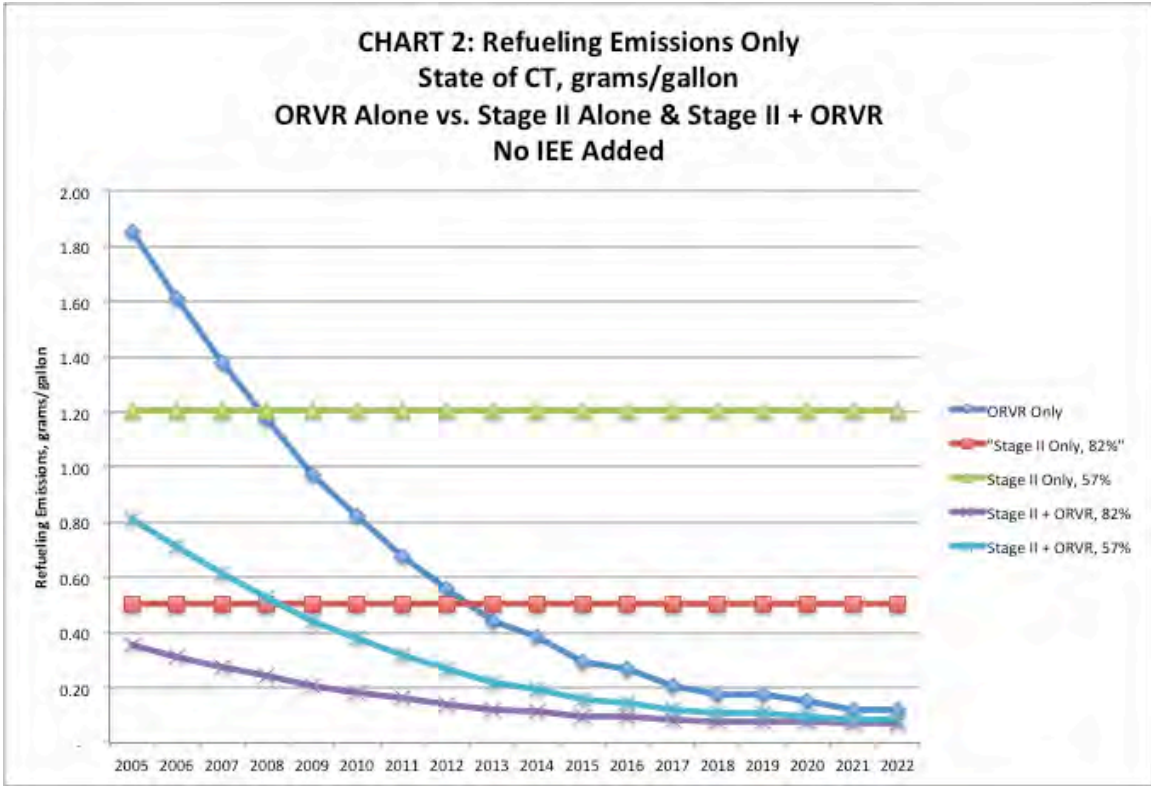
In our view, the concept of ORVR WSU "widespread use" has been misunderstood and misinterpreted. The primary flaw centers on the "breakeven" or "cross over

point”; where (1) the refueling emissions from ORVR alone are said to equal the refueling emissions from Stage II alone; or (2) when refueling emissions from ORVR alone are said to equal the refueling emissions from Stage II plus ORVR.

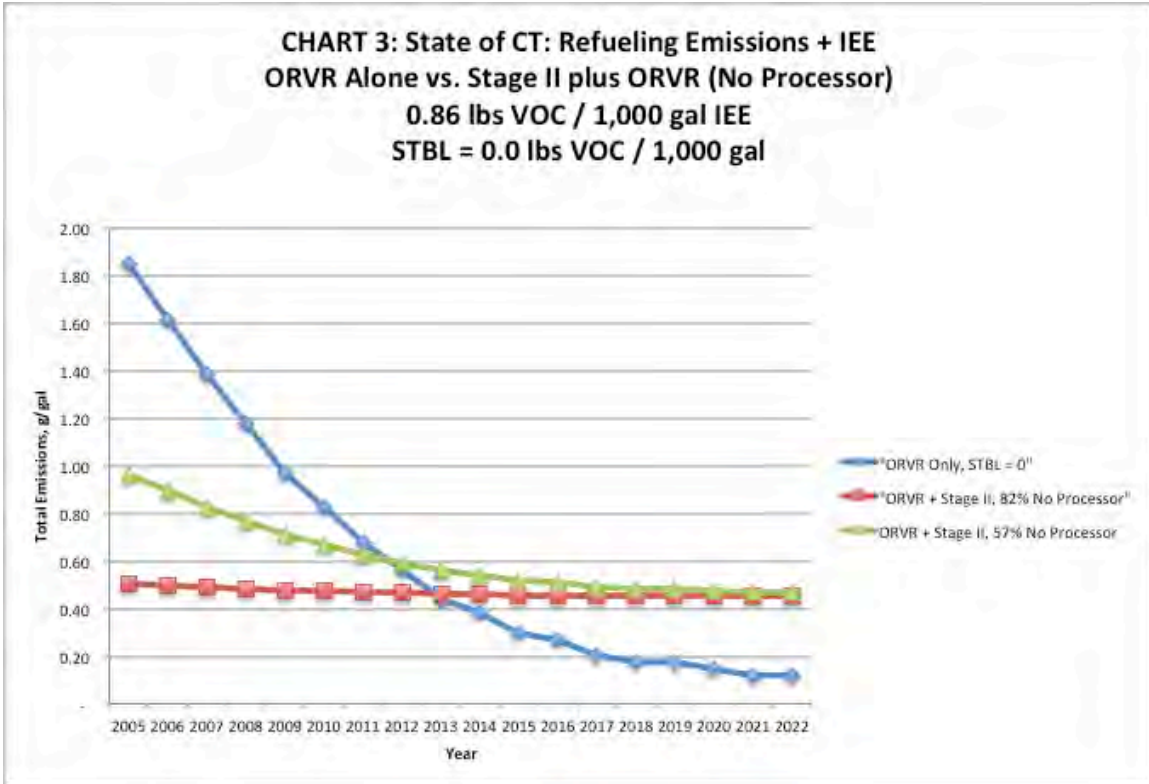
It is best to illustrate these points by charts. Chart 1, represents the data from the dKC Report shown as Figure 3 on page 48. Here ARID recreates the dKC data by using a simple spreadsheet instead of MOVES. Our spreadsheet uses all the same assumptions as dKC. First, we plot the ORVR Alone vs. Stage II Alone refueling emissions from 2005 through 2022; we show ORVR only and two control efficiencies for Stage II only, 82% and 57%. This Chart 1, is essentially the same as Figure 3.



Next, we show Chart 2, which incorporates Stage II + ORVR refueling emissions, using the same Stage II efficiencies of 82% and 57%. The refueling emissions with the combined use of Stage II and ORVR are always lower than the emissions with ORVR only; and there is no “crossover” point with ORVR only and the Stage II + ORVR curves. Thus definition (1) from above on WSU is negated, and there is no benefit to using ORVR Alone in comparison to Stage II + ORVR over the entire interval shown.

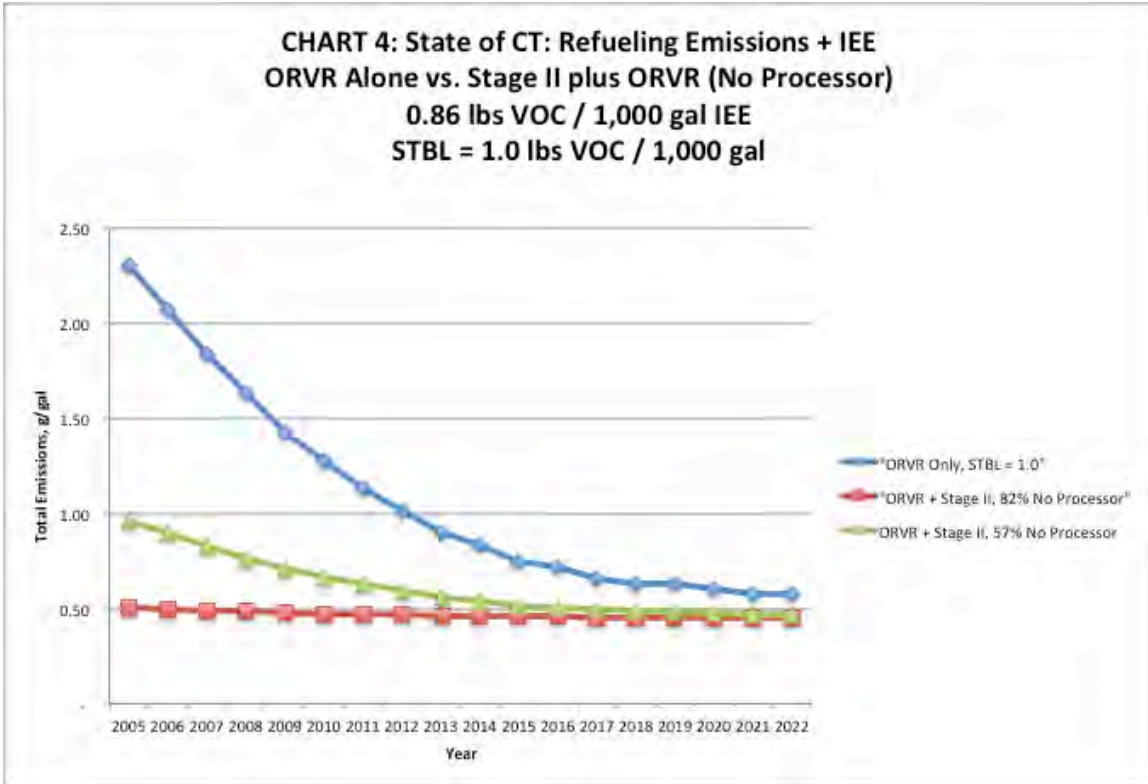


Next, we move to Chart 3, which represents the data from the dKC Report shown as Figure 4 on page 49. Here ARID recreates the dKC data by again using our simple spreadsheet instead of MOVES; incorporating the relevant dKC assumptions. First we plot ORVR Alone vs. Stage II plus ORVR, at the two Stage II efficiency levels. Even though ARID has directly measured values for IEE which far exceed the value of 0.86 lbs. VOC / 1,000 gal figure used by dKC for their Figure 4 plot; ARID uses the low figure in our Chart 3. Chart 3, if realistic, would show a benefit to using ORVR Alone beyond 2012 to 2013 (depending on Stage II efficiency).



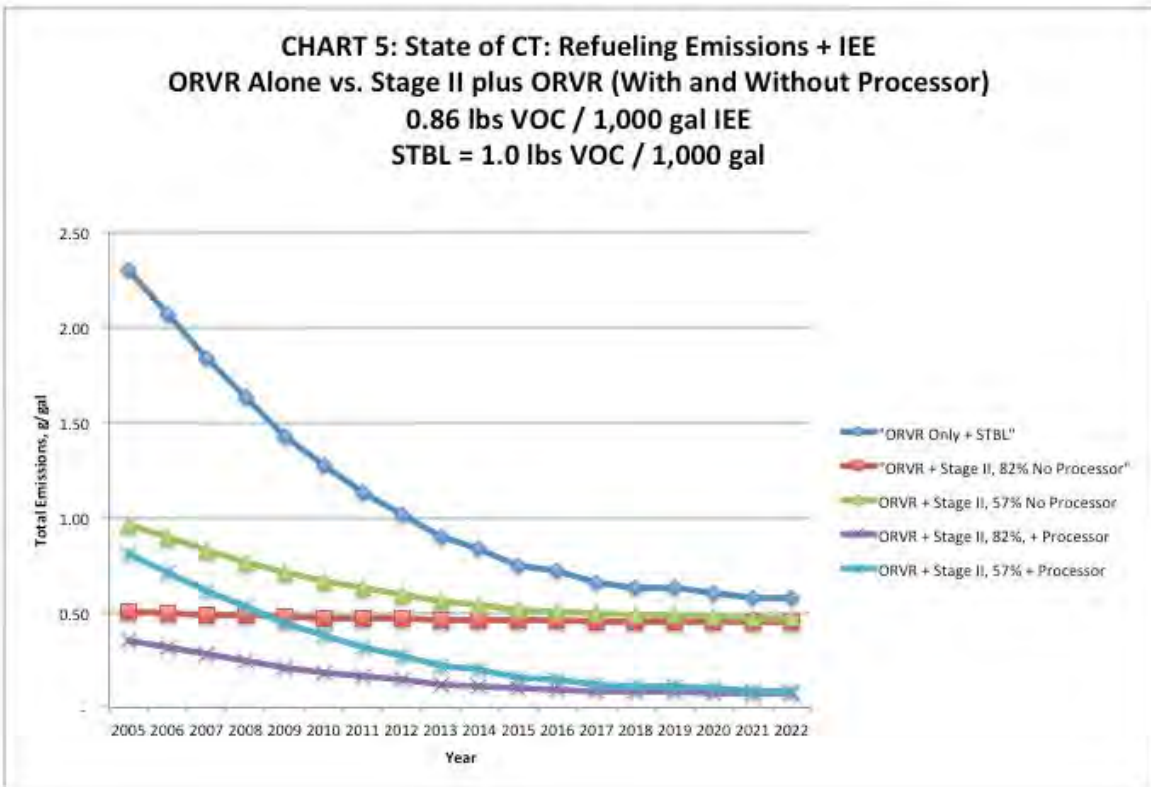
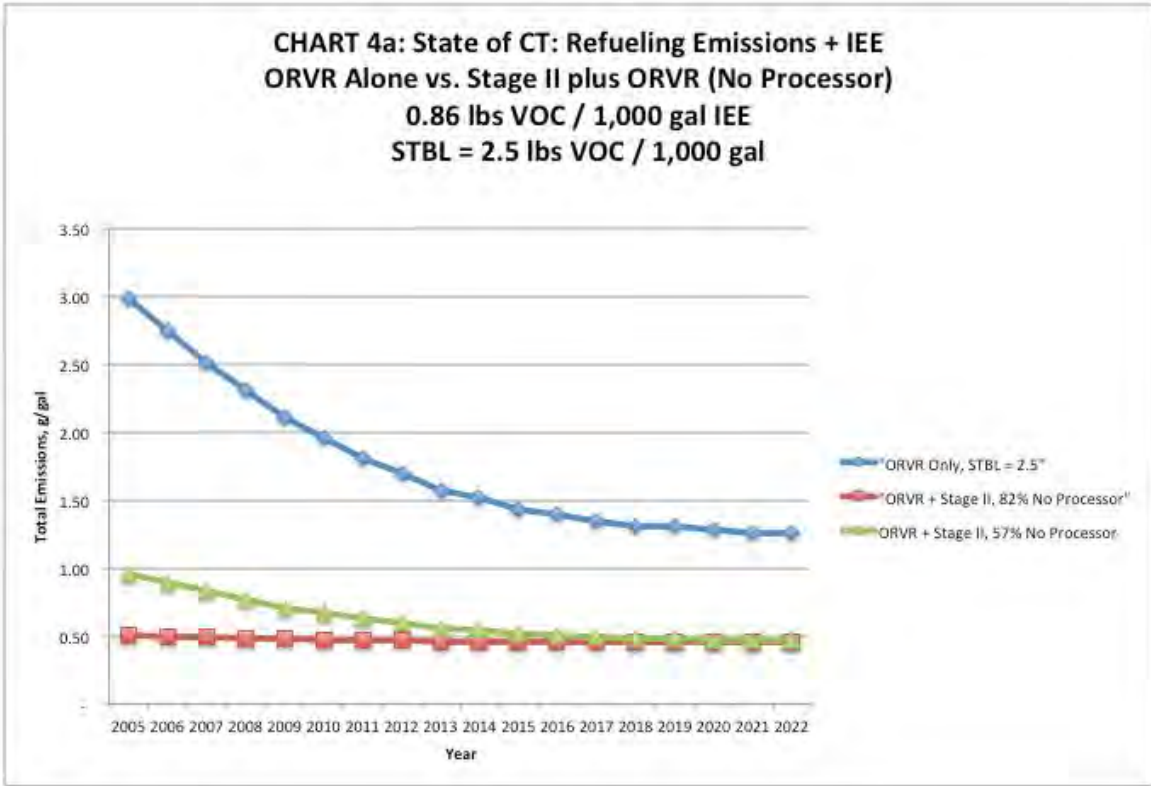
However, the major problem with Chart 3 (and Figure 4) is that the Storage Tank Breathing Losses (STBL) for the ORVR Alone plot is **set to zero**. The assumption of zero STBL is totally unrealistic and not supportable by actual measured data. The STBL are a very important contribution to the total vapor losses, and the dKC Report (and US EPA rationale) have totally neglected this category of emissions. For decades, the USEPA has ignored this category of important emissions in their analysis of Stage II and ORVR interactions.

It is this very same category of emissions which dKC recommends the use of a vapor processor for mitigating; however, the magnitude of these emissions is strangely assigned a zero in this part of the dKC analysis.



We incorporate a very conservative figure of 1.0 lbs./1,000 gal STBL in our Chart 4. Please note a gap between the ORVR Only emissions and the ORVR + Stage II emissions; there is no intersection of the curves and therefore no emissions reduction advantage to using ORVR Alone in comparison to ORVR + Stage II. Please also note that the emissions gap is relatively modest in future years. As a fair comparison, our Chart 5 now incorporates emissions curves for ORVR + Stage II + Vapor Processor; where an active vapor processor is used to control storage tank pressure and to reduce IEE by 99.3%, as confirmed by objective, third-party field testing.

In Chart 4a, below; we incorporate a still conservative figure of 2.5 lbs./1,000 gal STBL. Please note that further “upward shift” in the ORVR only emissions curve.



As seen in Chart 5, the ORVR + Stage II + Processor curves show a large reduction in total emissions from the ORVR Alone case, when STBL emissions are properly accounted for in the emissions inventory. We use a very conservative figure of 1.0 lbs. VOC / 1,000 gal for STBL; in practice ARID has measured values nearly five times higher than this figure, or about 5 lbs. of VOC per 1,000 gallons of fuel dispensed.

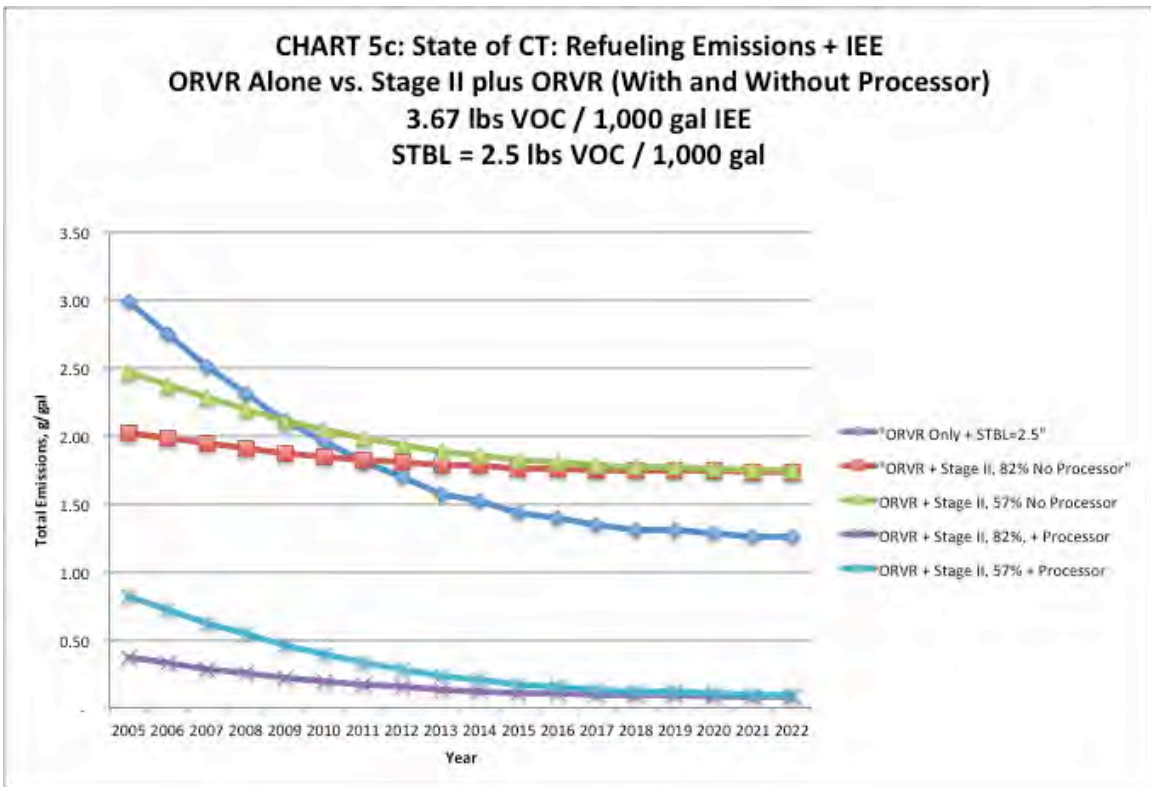
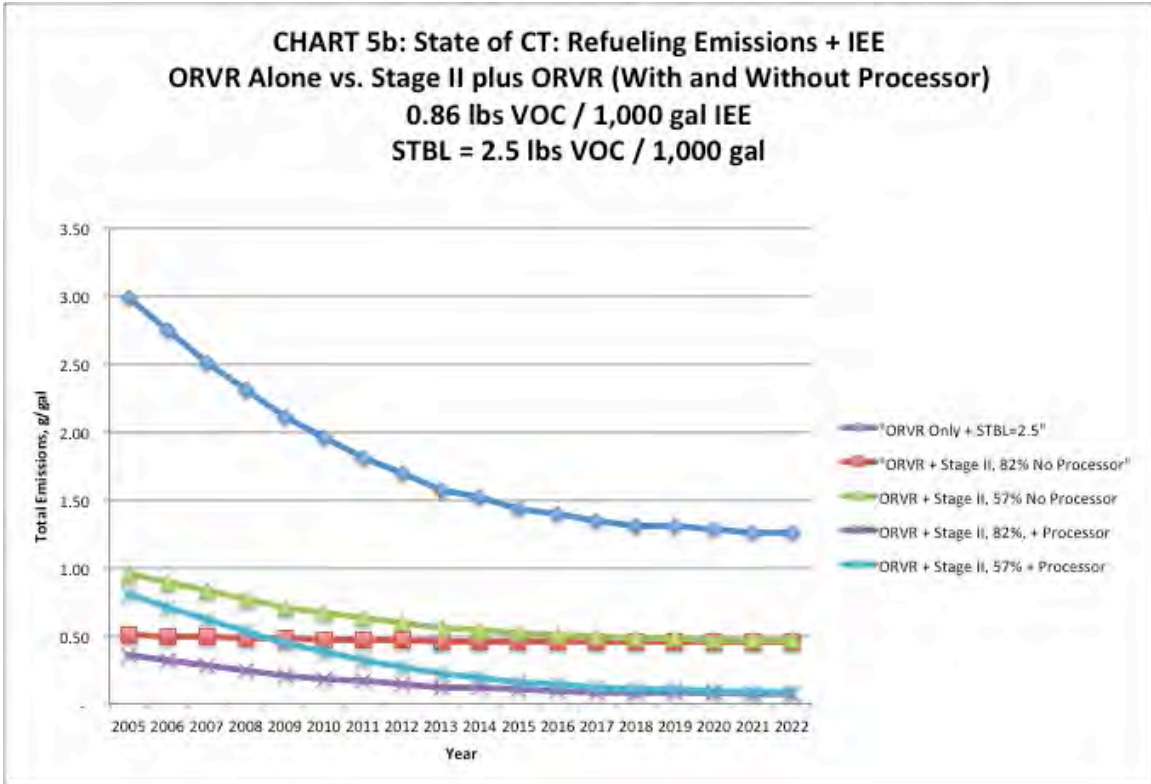
Chart 5b, below, shows the same curves but with STBL incremented to 2.5 lbs./1,000 gallons; still in our view a conservative figure.

Ironically, as mentioned previously, the dKC Report (and USEPA rationale) seems to recommend the elimination of Stage II (without considering enhancement via vapor processors); but then the report recommends the use of vapor processors to mitigate **the new problem** caused by STBL, in an ORVR only environment.

Especially bothersome is that STBL are not included in the dKC report to CT DEEP, Figure 4, page 49. The omission of these important storage tank emissions results in dramatically different (and incorrect) conclusions drawn from this study.

Thus far, we have explained a fundamental flaw in the dKC Report and USEPA treatment of storage tank emissions in an ORVR Alone environment. In addition, we have shown a large emissions gap between the CT DEEP proposal and the simple enhancement of Stage II vapor recovery. In the section to follow, we will quantify the costs per ton of VOC reduced under the CT DEEP proposal and compare these to the costs per ton of VOC reduced for a state-of-the-art approach using the ARID processor. For our economic analysis, we will incorporate the most conservative assumptions from our perspective (in other words; even though ARID has directly measured higher parameters for IEE and STBL; we will use lower figures referenced in the dKC Report and by USEPA)





### **Economic Analysis**

Assumptions used in the Cost Effectiveness calculations:

- Fuel Savings: \$4/gallon
- Stage II Operating Expenses: \$3,277/site-year
- Stage II Removal Expenses: \$7,000 / site (33% allocated in 2013, 33% allocated in 2015, and 33% allocated in year 2018)
- State of CT Gasoline Throughput: 1,514,621,565 gallons per year; constant over period 2013 – 2022
- Uncontrolled Refueling Emissions: 6.601 lbs. / 1,000 gallons
- Stage II Overall Vapor Recovery Efficiency: 69% (82% + 57%)/2
- ORVR Vapor Recovery Efficiency: 98%, constant with no degradation
- 93.5 % of fuel dispensed to GDF equipped with Stage II Vacuum Assisted systems
- IEE = 0.86 lbs. / 1,000 gallons
- STBL: 0, 1.0 and 2.5 lbs. / 1,000 gallons

Table 1: Cost Effectiveness: IEE = 0.86 lbs. VOC/1,000 gal, STBL = 1.0 lbs./1,000 gal

*ORVR Alone vs. Stage II + ORVR + Processor*

Column1	Column2	Column3	Column4	Column5	Column6	Column7
	2013	2013	2015	2015	2018	2018
Throughput Category	Fuel Savings	Net \$/Ton	Fuel Savings	Net \$/Ton	Fuel Savings	Net \$/Ton
Less than 300,000	\$53,378	(\$117,954)	\$45,708	(\$138,018)	\$39,571	(\$157,396)
300,000 to 700,000	\$185,606	(\$12,958)	\$158,934	(\$15,401)	\$137,597	(\$17,761)
700,001 to 1,100,000	\$311,185	(\$6,623)	\$266,467	(\$8,003)	\$230,693	(\$9,336)
1,100,001 to 1,500,000	\$266,012	(\$4,256)	\$227,785	(\$5,238)	\$197,204	(\$6,187)
1,500,001 to 1,900,000	\$206,887	(\$2,741)	\$177,157	(\$3,469)	\$153,373	(\$4,173)
1,900,001 to 2,700,000	\$298,885	(\$1,644)	\$255,935	(\$2,188)	\$221,575	(\$2,714)
2,700,001 to 3,900,000	\$283,986	(\$667)	\$243,177	(\$1,047)	\$210,530	(\$1,415)
> 3,900,001	\$316,870	\$145	\$271,336	(\$99)	\$234,908	(\$335)

If we exclude the first two throughput categories from above (< 700,000 gallons per year); The cost effectiveness for the six subsequent throughput categories show viable measures; where approximately 87.5% of CT gasoline throughput is controlled with the combination of Stage II + ORVR + Processor. Of particular note, the maximum cost per ton is show to be \$9,336, with a revenue stream of \$145 per ton for the best case. These figures are for very conservative IEE and STBL; please note that these cost effectiveness figures vary greatly from the dKC reported range of \$21,000 to \$32,000 per ton for Stage II enhancement, Table 30; page 34.

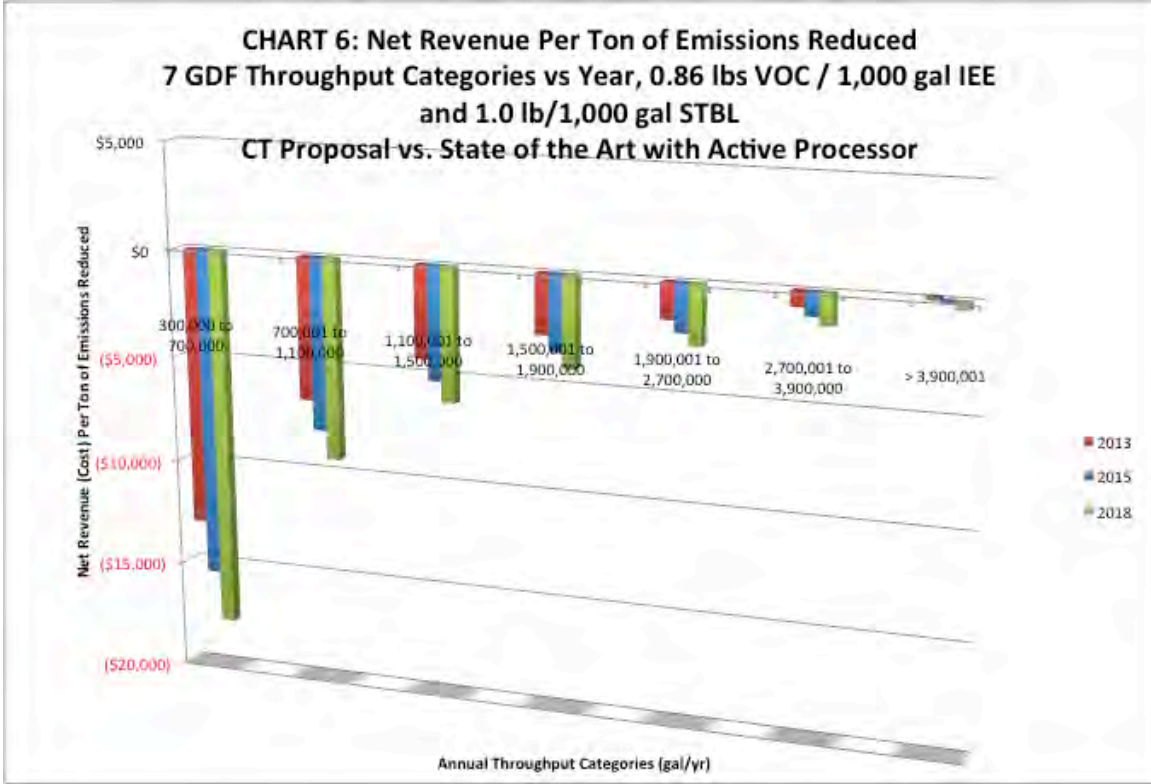
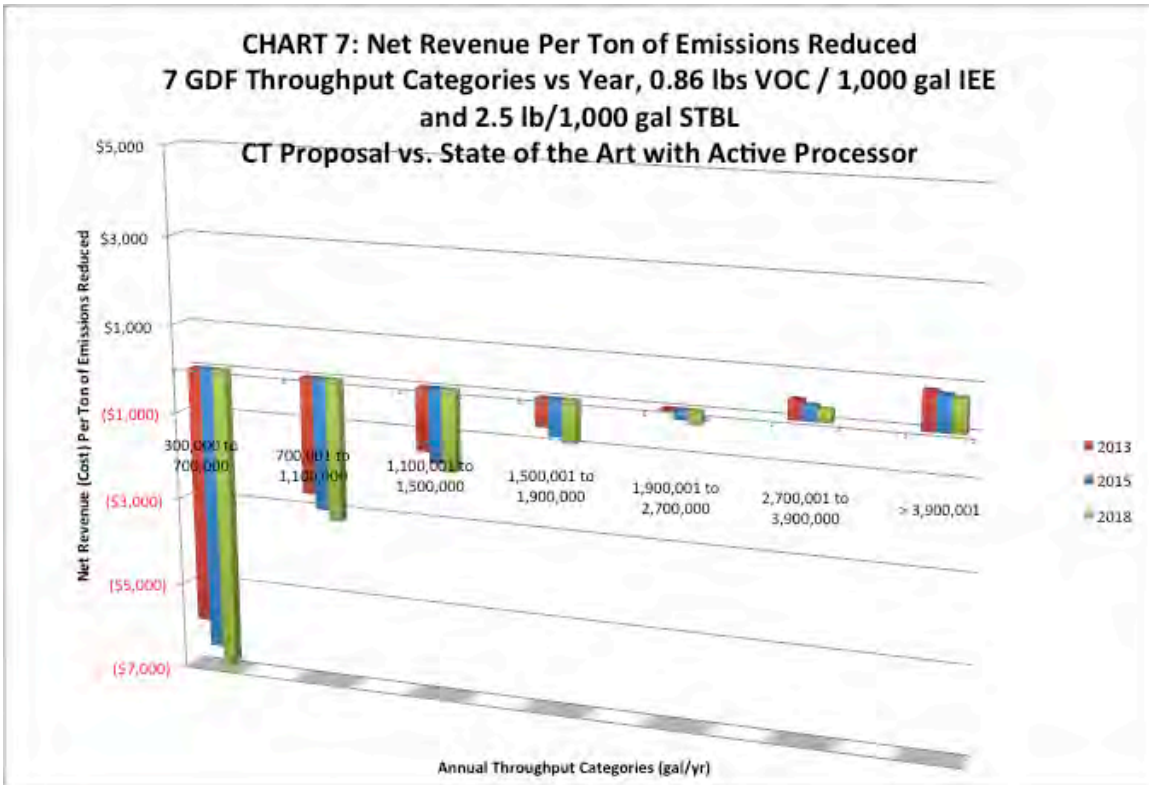


Table 2: Cost Effectiveness: IEE = 0.86 lbs. VOC/1,000 gal, STBL = 2.5 lbs./1,000 gal  
*ORVR Alone vs. Stage II + ORVR + Processor*

Column1	Column2	Column3	Column4	Column5	Column6	Column7
	2013	2013	2015	2015	2018	2018
Throughput Category	Fuel Savings	Net \$/Ton	Fuel Savings	Net \$/Ton	Fuel Savings	Net \$/Ton
Less than 300,000	\$103,834	(\$59,859)	\$96,164	(\$64,762)	\$90,027	(\$68,286)
300,000 to 700,000	\$361,051	(\$5,884)	\$334,379	(\$6,481)	\$313,041	(\$6,910)
700,001 to 1,100,000	\$605,334	(\$2,627)	\$560,617	(\$2,965)	\$524,842	(\$3,207)
1,100,001 to 1,500,000	\$517,461	(\$1,410)	\$479,234	(\$1,650)	\$448,653	(\$1,823)
1,500,001 to 1,900,000	\$402,449	(\$631)	\$372,719	(\$809)	\$348,935	(\$937)
1,900,001 to 2,700,000	\$581,407	(\$68)	\$538,457	(\$201)	\$504,097	(\$296)
2,700,001 to 3,900,000	\$552,425	\$435	\$511,616	\$342	\$478,969	\$275
> 3,900,001	\$616,394	\$852	\$570,859	\$793	\$534,431	\$750

If we exclude the first throughput category from above (< 300,000 gallons per year); The cost effectiveness for the seven subsequent throughput categories show viable measures; where approximately 97.2% of CT gasoline throughput is controlled with the combination of Stage II + ORVR + Processor. Of particular note, the maximum cost per ton is show to be \$6,910, with a revenue stream of \$852 per ton for the best case. These figures are for conservative IEE and STBL; please note that these cost effectiveness figures vary greatly from the dKC reported range of \$21,000 to \$32,000 per ton for Stage II enhancement, Table 30; page 34. Also the ARID costs are far below the upper cost range shown in Table 26, page 26, where a figure of \$42,257 per ton is listed.



## Negative Health Impacts

At a non-Stage II GDF, in addition to the problem of Storage Tank Breathing Losses, STBL, non-ORVR vehicle refueling will directly expose the motorist (and nearby people) to carcinogenic vapors, increasing toxic exposure risk factors. Please reference this link for video of a refueling event with a non-ORVR vehicle refueling at a non-Stage II GDF: <http://www.youtube.com/watch?v=E8Hoj-v0W4&feature=related>

- This problem will be more prevalent at GDF refueling a higher proportion of non-ORVR vehicles. Such GDF are typically located in so-called Environmental Justice (or "EJ") areas.
- Motorists who refuel non-ORVR equipped vehicles at non-Stage II GDF will be directly exposed to carcinogenic vapors, thus creating unnecessary and unreasonable risks to public health, welfare and safety

In Connecticut, the population of automobiles is approximately 2 million (1,999,809, US Dept. of Transportation, Federal Highway Administration, Highway Statistics, 2006). Thus, if ORVR penetration is 87% in year 2013; then 13% or 260,000 vehicles do not have ORVR. Using an ORVR vapor recovery efficiency of 98%; upon refueling each "batch of 260,000 cars", the raw emissions will be equivalent to 50 x 260,000 or 13,000,000 vehicles. This far exceeds the total vehicle population by a factor of 6.5 times. In another context, the motorist refueling a non-ORVR vehicle at a non-Stage II GDF will be exposed to **50 times the pollutants** as a motorist refueling an ORVR vehicle.

## Conclusion

In conclusion, the elimination of Stage II and sole reliance on ORVR technology does not provide the State of Connecticut with optimal emissions reductions; in terms of both refueling and storage tank emissions. This action will increase emissions of VOC's and HAPS, increase health risks to motorists, GDF employees and members of the Community, where the brunt of the emissions and negative health impacts will be borne by EJ Communities.

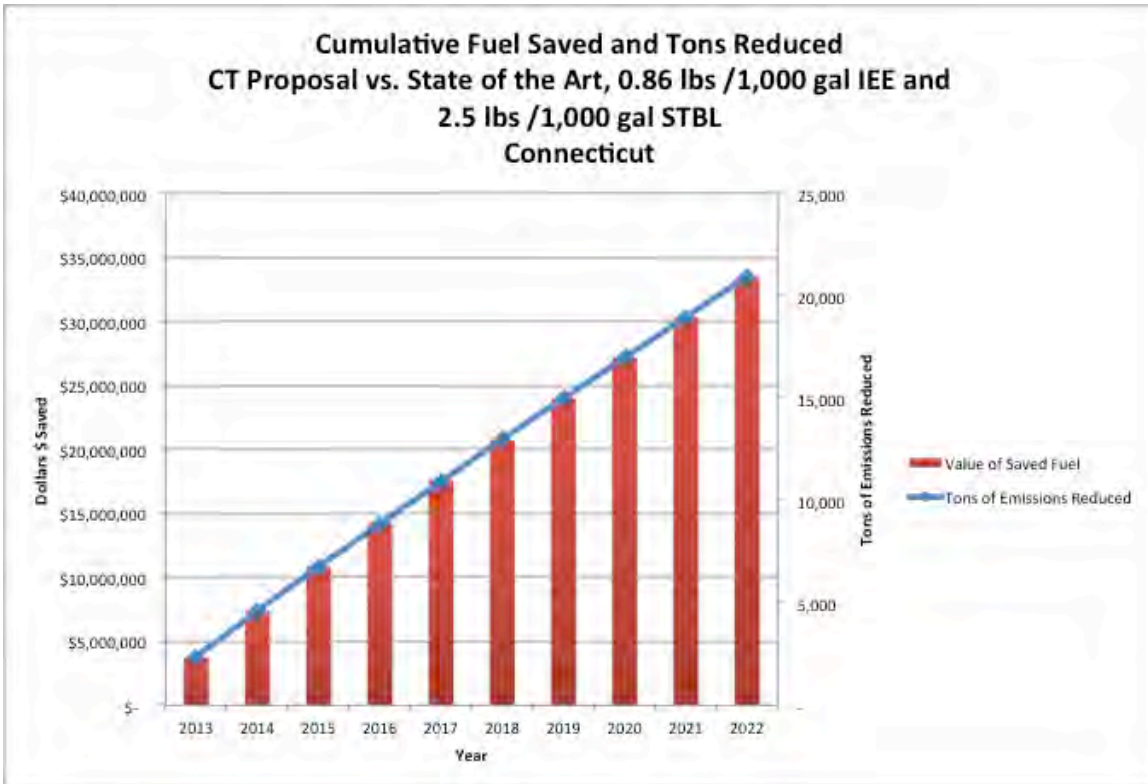
Overlooked in past studies and analyses on this topic are three key elements: 1.) The proper quantification and accounting for the IEE and the STBL from the Storage Tanks, 2.) The adverse health impacts from raw, uncontrolled emissions from non-ORVR vehicles; especially the disproportionate share of this burden being borne by EJ Communities, and 3.) The positive impact of using active processors to enhance Stage II by managing storage tank pressure and significantly reducing IEE and STBL.

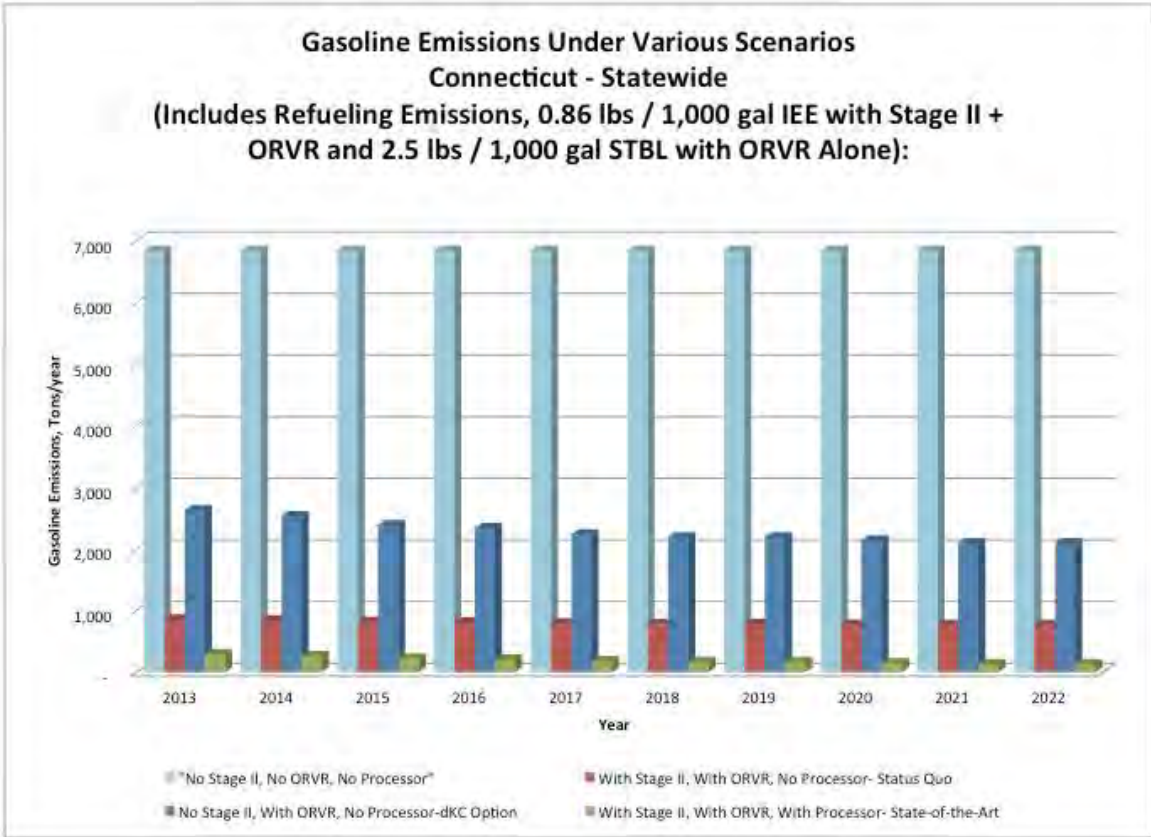
The optimal course of action is for CT DEEP to require Enhanced Stage II via vapor processors with continuous pressure monitoring and remote data acquisition.

The detailed analysis above shows that the use of an active processor provides the following benefits to a GDF:

- *Control of VOC's and HAP's*
- *Reduction of Toxic Exposure Risk to motorists, GDF employees and members of Community*
- *Energy Recovery from saved gasoline*
- *Automatic monitoring and inspection through data logging and remote data acquisition system*
- *Continuous monitoring to reduce leaks in UST and Stage II piping system*
- *Leverage valuable existing hardware already installed at GDF*
- *Improve operating efficiency and associated profitability for GDF*
- *Allow both large capacity and small capacity GDF to earn benefits*

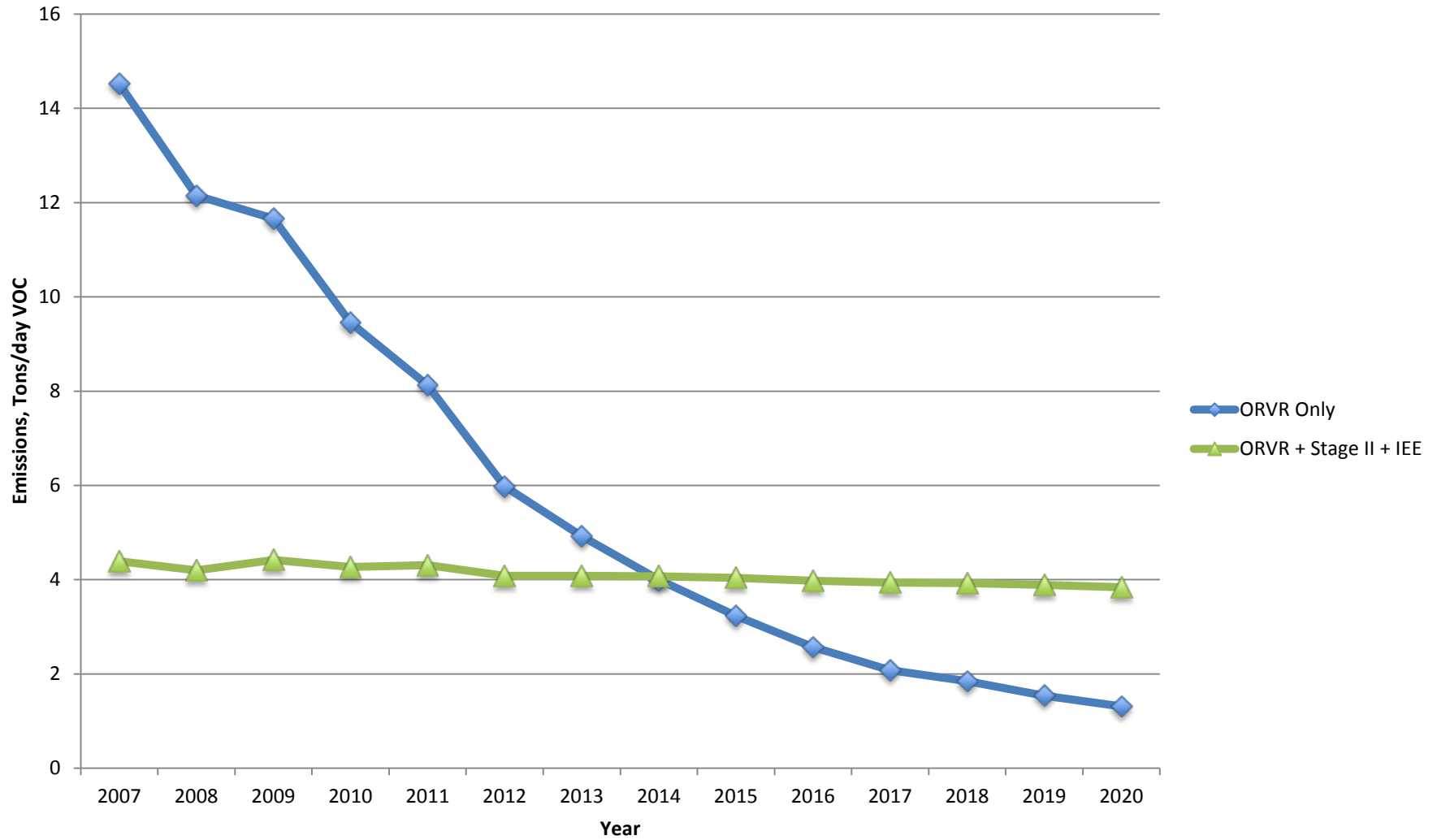
In comparison to ORVR Alone, the aggregate benefits for enhancing Stage II for the State of CT GDF operators with a vapor processor include \$33 million in fuel savings while at the same time reducing emissions of volatile organic compounds and air toxics by over 21,000 tons. In the final chart below which shows State of CT aggregate emissions in tons/year; it is interesting to note that the CT DEEP recommendation for ORVR Alone ranks 3<sup>rd</sup> out of 4 options; the Status-Quo case is a better alternative and the ARID processor case is the far superior option.







### Chicago Non Attainment Area MOVES Output Provided by IL EPA



year	ORVR Only	ORVR + Stage II (with IEE)
2007	14.52	4.39
2008	12.15	4.2
2009	11.66	4.42
2010	9.45	4.27
2011	8.12	4.31
2012	5.98	4.08
2013	4.92	4.08
2014	4	4.07
2015	3.23	4.04
2016	2.57	3.98
2017	2.08	3.94
2018	1.85	3.93
2019	1.54	3.89
2020	1.31	3.84