

STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

September 30, 2004



U.S. Environmental Protection Agency  
Office of Air Quality Planning and Standards  
Emissions Monitoring and Analysis Division  
Research Triangle Park, NC 27711  
Attn: Emissions Factors and Policy  
Applications Group (D243-02)

*Re: Comment on EPA's Stage II Vapor Recovery Systems Issues Paper Dated August 12, 2004*

Dear Mr. Thomas Driscoll:

The Connecticut Department of Environmental Protection (CTDEP) appreciates this opportunity to comment on the Stage II Vapor Recovery Systems Issues Paper concerning Stage II Vapor Recovery Systems (VRS) and On-board Refueling Vapor Recovery (ORVR) incompatibility issues. EPA held a public meeting (in addition to receipt of written comments on the paper) on September 20, 2004 to further discuss the issues raised in the paper. Although CTDEP did not attend the meeting, CTDEP staff participated via teleconference. Throughout the September 20<sup>th</sup> meeting, regarding the issues presented in the paper, the stakeholders presented thoughtful comments, some of which are discussed in greater detail below.

The State of Connecticut believes Stage II VRS is an effective and efficient means to both reduce ozone precursor emissions and protect public health by minimizing exposures to gasoline vapors that contain known human carcinogens. Connecticut has implemented Stage II VRS for over ten years. Continued use of Stage II systems is necessary because only light duty vehicles are required to have ORVR canisters available. CTDEP believes that Stage II systems will remain a critical element of an attainment strategy into the foreseeable future.

As such, CTDEP respectfully suggests EPA require the implementation of Stage II in ozone nonattainment areas as required by the CAA in order to maximize Volatile Organic Compound (VOC) reductions. CTDEP also agrees with NESCAUM's procedure for determining the definition of "widespread use".

As "widespread use" is reached, it would be very beneficial to consider implementation of technology to reduce, if not eliminate, excess emissions from ORVR/Stage II system incompatibilities (e.g., ARID Technologies Inc.'s PERMEATOR<sup>TM</sup>). At the September 20<sup>th</sup> meeting, one commentator mentioned that California already has three different Stage II system setups that accommodate ORVR-equipped vehicles. EPA's analysis shows that adopting some aspects of the California Air Resource Board's (CARB) Enhanced Vapor Recovery (EVR) program in states would result in even greater emission reductions. EPA should consider granting additional SIP credit to States that require Pressure/Vacuum (P/V) valves in conjunction with technology to reduce incompatibility excess emissions.

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CTDEP concurs with NESCAUM's comments to the Stage II Vapor Recovery Systems Issues Paper. Nevertheless considering ORVR effectiveness, until there is certainty to the lifespan of the ORVR system canisters, phase-out of Stage II systems should not be an option. Until proven otherwise, the possibility of ORVR system failures exists. If such failures were to occur after the Stage II removal, exposure to emission vapors upon refueling would be too serious of an occurrence to risk.

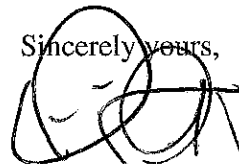
CTDEP requests that Stage II Vapor Recovery System and ORVR-equipped vehicles incompatibilities be more completely evaluated and quantified by EPA so that States can make informed decisions regarding the need for additional regulatory requirements to address the excess emissions issue.

In conclusion, CTDEP respectfully suggests that EPA adopt a definition of the term "widespread use" that preserves the effectiveness of existing Stage II programs. In addition, EPA should ensure areas that may not need to implement Stage II programs make adequate reductions. Regardless, implementation of Stage II programs for moderate or worse ozone nonattainment areas should be based on a clear federal definition, since Section 202(a)(6) of the Clean Air Act (CAA) states that the section 182(b)(3) Stage II requirement shall not apply in moderate areas after ORVR standards are promulgated.

Finally, by providing additional SIP credits for States that opt to require Stage II controls in new areas, EPA would provide an incentive for States in moderate nonattainment areas to implement Stage II systems compatible with ORVR, even though Section 202(a)(6) of the CAA provides an alternative.

If you have any questions, you may contact Ariel Garcia via email at [ariel.garcia@po.state.ct.us](mailto:ariel.garcia@po.state.ct.us) or at phone number (860) 424-3027 ext. 2589.

Sincerely yours,



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