



March 7, 2011

Co-Chair Edward Meyer  
Co-Chair Richard Roy  
Senator Andrew Roraback  
Representative Clark Chapin

Environment Committee:

We are submitting testimony in support of H.B. 6506 AN ACT CONCERNING THE MODERNIZATION OF CERTAIN GASOLINE VAPOR RECOVERY EQUIPMENT.

The Independent Connecticut Petroleum Association (ICPA) represents 576 petroleum marketers and their associated business in Connecticut. ICPA members employ over 13,000 people in our state and provide over 1,000 convenience stores with gasoline.

- **Background**

The 1990 Clean Air Act (CAA) Amendments contain provisions which require passenger cars to capture refueling emissions, ref. section 202(a)(6) of the CAA.

In 1994, EPA published regulations which require that vehicles meet refueling emission standards; ref. 59 FR 16262, April 6, 1994.

- **Onboard Refueling Regulations**

The EPA rule requires onboard refueling emissions controls for passenger cars and light trucks (e.g., pickups, mini-vans, and most delivery and utility vehicles). The EPA rule does not require onboard refueling emissions controls for heavy-duty vehicles and trucks (those over 8500 pounds gross vehicle weight rating (GVWR)). The rule covers 97 percent of new vehicles and 94 percent of refueling emissions.

For passenger cars, the onboard control requirements will be phased in over three model years with 40 percent, 80 percent, and 100 percent of new car production being required to meet the standard in model years 1998, 1999, and 2000, respectively.

The phase-in of onboard controls for light trucks will follow the phase-in period for cars. Onboard controls for the lighter class of light trucks (those under 6000 pounds GVWR) will be phased in during model years 2001 through 2003, while

onboard controls for the heavier light trucks (those from 6001 through 8500 pounds GVWR) will be phased in during models years 2004 through 2006.

When fully phased in the new controls will capture 95 percent of refueling emissions to cut volatile organic compounds (VOCs) and toxins by 300,000 to 400,000 tons nationwide. The VOCs that evaporate from gasoline during vehicle refueling and at other times are a major cause of urban ozone, or smog. According to an EPA study, 45 million Americans breathe air that exceeds the federal air quality standard for ozone, which is harmful to the human respiratory system and to farm crops.

The rule establishes a refueling emission standard of 0.20 grams per gallon of dispensed fuel, which will yield a 95 percent emission reduction over uncontrolled levels.

Currently, vehicles use activated carbon canisters to capture evaporative emissions. The rule establishes test procedures which will require vehicles to capture both evaporative and refueling emissions using a carbon canister (or other means).

- **Effects on Stage II Programs**

As required by the CAA, serious, severe, and extreme ozone non-attainment areas must, in the near term, maintain Stage II programs despite implementation of the onboard rule. This is due to the extra degree of emission control which Stage II can provide until onboard controls have been widely implemented throughout the in-use vehicle fleet.

The CAA authorizes EPA to allow state and local agencies to phase out Stage II programs, even in the worst non-attainment areas, once EPA has determined that onboard systems are in widespread use.

- **Cost Benefit of Onboard Controls**

Because fuel vapors will be trapped and used as fuel, there are fuel saving benefits associated with onboard systems. When these benefits are considered, the average net cost of the program drops to about \$5 per vehicle. Environmental Benefits of Onboard Controls because the onboard requirement applies to vehicles sold nationwide.

Onboard controls should replace Stage II, and EPA estimates that onboard systems will reduce annual ozone-forming VOCs and air toxic emissions by approximately 400,000 tons nationwide once these systems are fully phased in. This represents a one to two percent reduction nationwide in ozone-forming VOC emissions.

Health benefits will also result from the reduction in exposure of consumers and service station attendants to gasoline vapors, which contain toxic compounds, during vehicle refueling operations.

Annual fuel savings from onboard systems will average about 80 million gallons of gasoline in the 1998 to 2000 time frame. These fuel savings will be substantially greater in later years as the affected proportion of the fleet increases and as trucks are phased into the program. These fuel savings not only reduce emissions from vehicles themselves, but also refineries and transfer points throughout the gasoline distribution system, where evaporation can occur.

For these reasons we ask that the Environment Committee support of H.B. 6506 AN ACT CONCERNING THE MODERNIZATION OF CERTAIN GASOLINE VAPOR RECOVERY EQUIPMENT and move to eliminate the Stage II Vapor Recovery Program in Connecticut.

Respectfully,

A handwritten signature in black ink, appearing to read "Christian A. Herb". The signature is fluid and cursive, with a large initial "C" and "H".

Christian A. Herb  
Vice President

