

necsema

New England Convenience Store & Energy Marketers Association

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November 21, 2018

Ms. Karen Slattery
Rhode Department of Environmental Management
235 Promenade Street
Providence, RI 02908

RE: Proposed Amendments
Rule Identifier: 250-RICR-120-05-11
Air Pollution Control Regulation No. 11
Petroleum Liquids Marketing and Storage


Dear Ms. Slattery:

The New England Convenience Store and Energy Marketers Association of New England (NECSEMA) appreciates the opportunity to provide the Rhode Island Department of Environmental Management (RI DEM) with the following comments concerning the above referenced Proposed Amendments to Air Pollution Control Regulation No. 11 – Petroleum Liquids Marketing and Storage.

NECSEMA recommends Part 11.9.2 Prohibitions, ¶F.5 be deleted. California Air Resources Board (CARB)-certified Stage I enhanced Vapor recovery (EVR) equipment currently installed is already passing the required CARB compliance test methods employed for integrity testing. A review of compliance testing results submitted by gasoline dispensing operators to the RI DEM will document current compliance. Therefore, the proposed compliance deadline of December 25, 2020 is unnecessary. If a Stage I vapor control system component does not pass a compliance test, the failed component or components need to be replaced with a CARB-certified EVR Stage I component and re-tested to demonstrate compliance.

Thank you again for the opportunity to provide comments on the proposed amendments and please let me know if you have any questions. I can be reached at telephone number: (508) 397 – 9641; or, by email at: ray@necsema.net

Very truly yours,



Raymond F. Leather, P.O.E., P.E., L.S.P.
Director of Energy & Environmental Affairs

Cc: Mr. Jon Shaer – Executive Director of NECSEMA