

**STATE OF CONNECTICUT
DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION**

In Re The Matter Of	:	General Permit
	:	
General Permit To Decommission	:	
Stage II Vapor Recovery	:	December 21, 2012
	:	

**ARID Technologies, Inc.’s
Request For Intervening Party Status Pursuant To CGS § 22a-19**

Pursuant to CGS § 22a-19 and RCSA § 22a-3a-6(k), ARID Technologies, Inc. (“ARID Tech”) requests intervening party status in the above referenced proceeding. As set forth in the attached Verified Petition for Intervention, Arid Tech asserts that the General Permit will have, or is reasonably likely to have, the effect of unreasonably polluting, impairing, or destroying the public trust in the air, water, or other natural resources of the state.

ARID Technologies, Inc.

/s/ Alan M. Kosloff

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ARID Technologies, Inc.’s Verified Petition For Intervention

ARID Technologies, Inc. hereby intervenes in the above-captioned matter pursuant to CGS § 22a-19(a) and asserts:

1. On or about November 7, 2012, DEEP published notice of its tentative determination to issue the above referenced general permit. A timely request was filed pursuant to CGS § 22a-174(k), and this matter is now a contested case proceeding.
2. CGS § 22a-19(a) provides that: “[i]n any administrative, licensing or other proceeding, and in any judicial review thereof made available by law, the Attorney General, any political subdivision of the state, any instrumentality or agency of the state or of a political subdivision thereof, any person, partnership, corporation, association, organization or other legal entity may intervene as a party on the filing of a verified pleading asserting that the proceeding or action for judicial review involves conduct which has, or which is reasonably likely to have, the effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state.”

3. The proposed general permit includes the decommissioning of Stage II Vapor Recovery Systems. 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 recovered vapors include volatile organic compounds ("VOCs") and other hazardous air pollutants ("HAPs").
4. VOCs are precursors to smog and ozone formation in the lower atmosphere, which is detrimental to human health. Smog remains a continuing problem in the State of Connecticut, and in the region. Direct exposure to some hazardous air pollutants, such as benzene, are known to increase risks for cancer.
5. As more fully articulated in Arid Technologies' submitted technical comments, the newer On Board Refueling Vapor Recovery Systems (known as ORVR systems), installed in some passenger vehicles since 1998 and in all new passenger vehicles since 2000, does not replace the need for, or the benefits of, the Stage II systems.
6. The tentative determination to permit decommissioning of Stage II Vapor Recovery Systems will (or is reasonably likely to) lead to increased emissions of VOCs and other HAPs, thus having the "effect of unreasonably polluting, impairing or destroying the public trust in the air, water or other natural resources of the state."
7. There are feasible and prudent alternatives to the proposed action.

Wherefore, ARID technologies, Inc. respectfully requests intervening party status in this proceeding pursuant to CGS § 22a-19.

I, the undersigned, being duly sworn, depose and say that I have read the foregoing Verified Petition For Intervention and I, Tedmund Tiberi, President of ARID Technologies, Inc., verify that the allegations contained therein are true to the best of its and my knowledge and belief.

Intervening Party
ARID Technologies, Inc.



Tedmund Tiberi
President, duly authorized

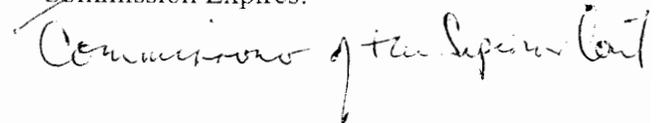
Subscribed and sworn before me this 21st day of December, 2012.



ALAN M. LOSLOFF

Notary Public

Commission Expires:



Certificate of Service

I hereby certify that, a copies of the above were delivered via both U.S. Mail and electronic mail on December 21, 2012 to all counsel and pro se parties of record as follows:

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/s/ Alan M. Kosloff

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