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Sunoco, Inc.
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INDEPENDENT REGULATORY
REVIEW COMMISSION

September 12, 2007

Environmental Quality Board
Rachel Carson State Office Building
400 Market St.
Harrisburg, PA 17101-2301

RE: Comments on July 14, 2007 Proposed Rulemaking Hazardous Waste Regulations

Dear Environmental Quality Board,

The following are comments prepared by Sunoco, Inc. ("Sunoco") on the Proposed Rulemakings on the Hazardous Waste Regulations which were published in the Pennsylvania Bulletin on July 14, 2007.

Sunoco, Inc, headquartered in Philadelphia, PA, is a leading manufacturer and marketer of petroleum products and petrochemicals, processing over 900,000 barrels per day of crude oil and selling approximately five billion pounds of petrochemicals. Sunoco operates two refineries and two chemical facilities in Pennsylvania. In addition, Sunoco markets gasoline under the Sunoco brand at more than 4,800 service stations stretching from Maine to Florida. Sunoco currently has over 3,000 employees in Pennsylvania.

Sunoco has worked with the Pennsylvania Chemical Industry Council (PCIC) and supports the detailed comments on the proposed rule that PCIC has submitted. Although Sunoco supports many of the proposed changes included in the July 14, 2007 Proposed Rulemaking, Sunoco is particularly concerned about the proposed elimination of the financial test and corporate guarantee currently allowed in Section 264a Subchapter H, its counter-part in Section 265a.Subchapter H, and in proposed new Section 267a Subchapter H.

The elimination of the corporate guarantee provision which is allowed under USEPA regulations and most if not all other states, will result in increased and unnecessary expenses for Sunoco and similar low risk companies in obtaining alternate coverage such as through insurance. The existing program already limits the use of the corporate guarantee to stronger financial companies as evidenced by the limited use by 16 companies for 23 facilities in the Commonwealth, primarily by manufacturing companies and not by waste management companies. The PADEP has failed to justify this proposed unnecessary expense from a program that has as of yet not led to any significant costs to the Commonwealth and that will as proposed cause increased expenses for facilities in Pennsylvania that are not required in other states. Sunoco supports the alternate approach included in PCIC comments to change the current PADEP financial assurance process to be more consistent with what is required by the USEPA.

Please contact me at 610-859-3425 or cdbarksdale@sunocoinc.com if you have any questions on these comments.

Sincerely,
Sunoco, Inc.

Charles D. Barksdale Jr., P.E.
Manager, Environmental Services