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2010 NOV 30 P 2:40

November 29, 2010

2874

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Comments Proposed Rulemaking Commercial Fuel Oil Sulfur Limits for Combustion Units

The Pennsylvania Petroleum Marketers and Convenience Store Association represents over 400 independent businesses that distribute petroleum products in the state.

In addition to distributing motor fuel products and lubricants, PPMCSA members deliver oilheat fuel to over 1.1 million homes and thousands of commercial, governmental and non-profit entities in the state. The majority of Association companies also provide service for oilheat heating systems.

Pennsylvania is the second largest oilheat consuming state in the country, following New York State.

PPMCSA strongly supports the proposed rule of the Environmental Quality Board that would require that the sulfur content of oilheat fuel sold in the Commonwealth after May 1, 2012 not exceed 15ppm. We offer the following comments:

1. PPMCSA AGREES THAT REDUCING SULFUR TO 15PPM DOES RESULT IN SIGNIFICANT OPERATING COST SAVINGS FOR CONSUMERS.

Reducing sulfur content in oilheat fuel results in a dramatic lessening of the sulfur residue resulting from the combustion process in furnaces. This results in a more efficient burn and reduces the frequency and time needed for furnace service calls.

It is estimated that consumers would experience a 14-cent-per-gallon reduction in operating costs without the need to install new furnaces.

(Please see Attachments 1 and 2)

2. THE ESTABLISHMENT OF THE 15PPM OILHEAT FUEL STANDARD WOULD RESULT IN SIGNIFICANT OPERATING COST REDUCTIONS FOR PETROLEUM DISTRIBUTION COMPANIES ACROSS THE STATE.

Current federal law requires that on-road and off-road diesel sold in the state after June 1, 2010 have a sulfur limit not to exceed 15ppm.

Diesel and oilheat fuel are essentially the same product. In the past, oilheat fuel and off-road diesel could be stored in the same tanks and distributed using the same vehicles. However, with the products now having different standards for sulfur, it has been necessary for petroleum distributors to establish new patterns of service and delivery.

This factor adds hundreds of thousands (likely millions) to the cost of delivering fuel in the Commonwealth.

Establishing oilheat fuel to the same standard as the federal ultra low diesel rule would result in dramatic operating cost reductions for these distribution companies, many of which are small businesses.

3. PENNSYLVANIA SHOULD ESTABLISH A 15PPM OILHEAT SULFUR STANDARD NOW TO ASSURE A SMOOTH TRANSITION IN LIGHT OF DEVELOPMENTS IN NEIGHBORING STATES.

This past summer, New York State enacted a statute that would require oilheat fuel sold in that state not to exceed 15ppm by July 1, 2012. Additionally, New Jersey adopted a regulation that established a standard requiring oilheat fuel sold in that state not to exceed 500 ppm by July 1, 2014 and 15ppm by July 1, 2016.

Pennsylvania should adopt the same basic schedule for ultra low sulfur oilheat fuel as New York to allow refiners and the supply network a clearly defined goal in the two largest oilheat fuel markets in the country. Consumers and the petroleum distribution network should be in a position to achieve the same benefits on the same timetable as those comparable entities in New York.

Studies indicate that supply capabilities do exist to provide for this transition. (See Attachment 2) In addition, it has been announced that the reopening of a refinery in Delaware would provide a significant source of new supply of ULS oilheat fuel for Pennsylvania.(See Attachment 3)

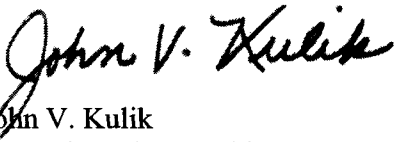
4. THE ESTABLISHMENT OF ULS OILHEAT FUEL WOULD PRESERVE OR CREATE JOBS IN THE COMMONWEALTH.

Approximately 7,000 people are employed by the oilheat distribution system in Pennsylvania. The adoption of this regulation would enhance and modernize the product standard to keep the industry competitive in the future.

In addition, although owners of existing furnaces will achieve immediate reductions in operating costs when utilizing ULS oilheat fuel, technology exists for the manufacture of furnaces that only utilize ULS. Fuel. The most notable example of this is in Germany, which has adopted a 50 ppm standard that has resulted in new furnace production. Manufacturers in Pennsylvania have indicated an interest in establishing similar production in this state if an ULS standard is adopted.

We would be happy to provide further information regarding the benefits of ULS oilheat fuel.

Sincerely,



John V. Kulik
Executive Vice President
Pennsylvania Petroleum Marketers and Convenience Store Association
P.O. Box 68
Highspire, PA 17034-0290



By Bob Hedden,
Executive
Director, Oilheat
Manufacturers
Association

Advantages of Ultra-Low Sulfur Heating Fuel

Why Ultra Low Sulfur?

Unfortunately, ordinary heating fuel here in the United States contains some sulfur, and when it burns, the sulfur causes problems. About 99% of the burned sulfur turns into sulfur dioxide— SO_2 —which, after it leaves the stack, becomes a fine particulate pollutant designated $\text{PM}_{2.5}$.

A $\text{PM}_{2.5}$ particulate irritates lungs, contributes to pulmonary disease and creates haze. Fortunately, going to ultra low sulfur (ULS) fuel eliminates 99.5% of $\text{PM}_{2.5}$ particulates, effectively eliminating the problem.

A small amount of the sulfur becomes sulfur trioxide, or SO_3 . This compound combines with water in combustion gases to create sulfuric acid (H_2SO_4), which, at a temperature of about 220°F, starts to condense in heat exchangers and venting systems.

Sulfuric acid is sticky and it adheres to any cooler surface, such as heat exchanger walls, the flue pipe and the inside of the chimney. The sulfuric acid reacts with the iron or steel and creates the crusty buildup we call scale, which can reduce efficiency and cause other problems. Switching the fuel to ultra low sulfur would totally eliminate scale deposits.

Ultra Low Sulfur BNL-NYSERDA

Brookhaven National Laboratory and the New York State Energy Research and Development Authority (NYSERDA) tests show that 500 parts per million (ppm) low sulfur fuel leads to very clean heat exchangers; 15 ppm (ultra low) leads to totally clean heat exchangers. The tests also indicate that the process refiners use to remove sulfur also leads to better fuel thermal and storage stability. This hydrodesulphurization process converts some unstable, unsaturated double bonds hydrocarbon molecules into saturated bonds that are more stable.

Sulfur in fuel also increases oxidative degradation and the formation of sludge. Sludge has higher sulfur content than the base oil. Finally, the process that removes sulfur also reduces fuel-bound nitrogen, which in turn reduces nitrogen oxide (NO_x) emissions.

German R&D

The German equivalent of the National Oilheat Research Institute (NORA) is IWO, which stands for *Institut Für wirtschaftliche Oelheizung*, or Institute for Economic Oilheating. IWO has done extensive testing of 50 ppm sulfur fuel in condensing and wall hung units, including some with low firing rate .25 gph blue flame burners. Their test show

Advantages of Ultra-Low Sulfur Heating Fuel

Continued from preceding page



good thermal and storage stability. Issues include low lubricity (the fuel needs a lubricity additive) and metal dusting, a form of corrosion degradation that under high heat is manifested as a breakup of bulk metal to metal powder, hence the name. It shows up in lab tests on some blue flame burners, but does not seem to be a problem in the field.

German heating oil sulfur levels since 2008 have been at 1,000 ppm. In 2012, they are dropping to 50 ppm. In Germany today, both 1000 ppm and 50 ppm are available, but 50 ppm is not mandatory. This was done to enable manufacturers to sell, and consumers to buy, very compact, wall-hung oil fired condensing boilers (see below). Manufacturers would not be motivated to introduce these to the market unless they were sure customers could buy the ULS heating oil.

Since January 2009, Germany charges a higher tax on standard heating oil (max. 1,000 ppm sulfur) than for ultra low sulfur heating oil. Consequently, sales of low sulfur heating oil have increased. For the first six months of this year, 2,603,638 tons of low sulfur heating oil were sold, amounting to 21% of the German heating oil demand.

Also, German refineries are changing all production to low sulfur heating oil. In some areas of Germany, you can get only low sulfur heating oil. In the future, IWO expects that low sulfur will take over the heating oil market completely.

In 2008, 45% to 55% of the oil boilers sold in Germany were low temperature boilers and condensing boilers. So far, in 2009, over 60% of the oil boilers sold were of the condensing variety.

Wall Hung Boilers

European wall hung boilers, compact in size, have generated a great deal of interest. It is worth noting that when a boiler gets compact, the heat transfer rates go up—you are getting the same amount of heat transfer in a smaller heat exchanger area.

However, when you do this, the mass transfer rates also go up—specifically the rate at which sulfuric acid gets deposited on the heat exchanger from the flue gas.

So, as a result, unless low sulfur oil is used, these compact heat exchangers can get fouled very quickly.

Natgas and Heating Oil

IWO testing shows that at 50 ppm, the acidity and chemistry (i.e. sulfate concentra-

tion) of flue gas condensate was about the same for natural gas and oil.

Low Firing Rates

Because house sealing and insulation have improved dramatically, most of our equipment installed in the field is really oversized. To remain competitive, we must have burners that fire reliably at less than a half gallon an hour into low mass heat exchangers. In order to do that, we must improve fuel quality. Ultra low sulfur with Bio and a tight specification for the fuel will do that for us. (Diesel Fuel already has a tight specification; heating oil needs one as well.)

MANE-VU

Recently, Governors in the Northeast states, from Maryland to Maine, have gotten together and collectively agreed to lower sulfur levels in heating oil. This alliance is designated MANE-VU, for the Mid-Atlantic/Northeast Visibility Union.

They agreed to the following sulfur limits:

Mid-Atlantic states: 500 ppm by 2012, 15 ppm by 2015;

New England: 500 ppm by 2014, 15 ppm by 2018.

Nevertheless, the Oilheating industry feels, and has expressed its desire, that this should be done much sooner.

Bioheat®/Ultra Low Sulfur Fuel

The ideal fuel, though, isn't just ultra low sulfur heating oil. It is a blend of biofuel and ULS fuel. This mix, dubbed Bioheat, provides excellent advantages over conventional fuel, including the following:

- Bioheat reduces our dependence on foreign oil. That is an absolute fact. If we were to convert just 2% of heating oil to biofuel, it would require 180 billion gallons of B100. That is 180 billion gallons of oil that is not imported.
- Bioheat is good for the environment.
- The Bioheat industry is creating green jobs and making a positive contribution to the economy.
- The Bioheat industry stimulates development of

new low-carbon feedstocks. The feedstocks used to produce U.S. biodiesel are becoming increasingly diversified, with waste products such as animal fat and used restaurant grease (yellow grease) making up a larger portion of the feedstock used to produce the fuel.

Biodiesel production is currently the most efficient way to convert lipids into low carbon diesel replacement fuel, and as a result, industry demand for less expensive, reliable sources of fats and oils is stimulating promising public, private and non-profit sector research on second generation feedstocks such as algae.

Another promising technology NORA is exploring is Bioheat from woody biomass and discarded wood products such as cardboard.

The bottom line is this: Switching to Bioheat with ultra low sulfur fuel makes Oilheat the Fuel of the Future.

Advantages of Ultra Low Sulfur Fuel

There are a number of good reasons to switch away from high sulfur content. An Ultra Low Sulfur fuel:

- Eliminates scale build-up in heat exchangers caused by condensing on start-up and even during the run-cycle on high efficiency equipment.
- Reduces efficiency degradation through the heating season.
- Reduces service time and therefore cost during the tune-up.
- Increases the life of the heat exchanger and venting components.
- Eliminates SOx emissions and fine particulate emissions.
- Provides better storage and thermal stability of the fuel.
- Enables relatively low-tech, inexpensive, reliable condensing technology that increases AFUE ratings by 6.5%.
- Enables the industry to produce a wide variety of competitively priced appliances with AFUE ratings above 90%.

Pennsylvania Heating Oil Market Study

Prepared for:

Pennsylvania Petroleum Marketers and C-Store
Association

May 25, 2010

Outline

- **Key points and observations**
- **Distillate demand**
- **Refinery production**
- **Imports/exports**
- **Distillate balance**
- **Heating oil/diesel price differentials**
- **Impacts on consumers**

Key Points and Observations

- **Low sulfur distillate supplies in PADDs 1 and 3 are sufficient for PA to shift to low sulfur in heating oil at nearly anytime.**
- **PA is not self-sufficient in low sulfur supplies should such a shift be made.**
 - *Low sulfur supplies from the USGC will be needed. ULSD is currently exported. Directionally, ULSD prices would increase by some relatively small amount since ULSD is already supplied to the PA market from the USGC.*
 - *PA refiners will need to export high sulfur production that is currently consumed in PA to other states. Refiners would receive a lower price for high sulfur by the amount of the transportation cost to move high sulfur to another market.*

Key Points and Observations

- **The USGC has been exporting between 150,000 and 200,000 bpd of ULSD.**
 - *These supplies could be used in the US heating oil market if price signals are sufficient.*
- **Exported USLD volumes are insufficient to support the entire US heating oil market.**
 - *At the time of this writing PA would be the first to adopt low sulfur regulations. No other states have anything definitive prior to 2016*
- **If all states move to low sulfur heating oil, the refining industry will need sufficient lead time to make the necessary capital investments.**

Key Points and Observations

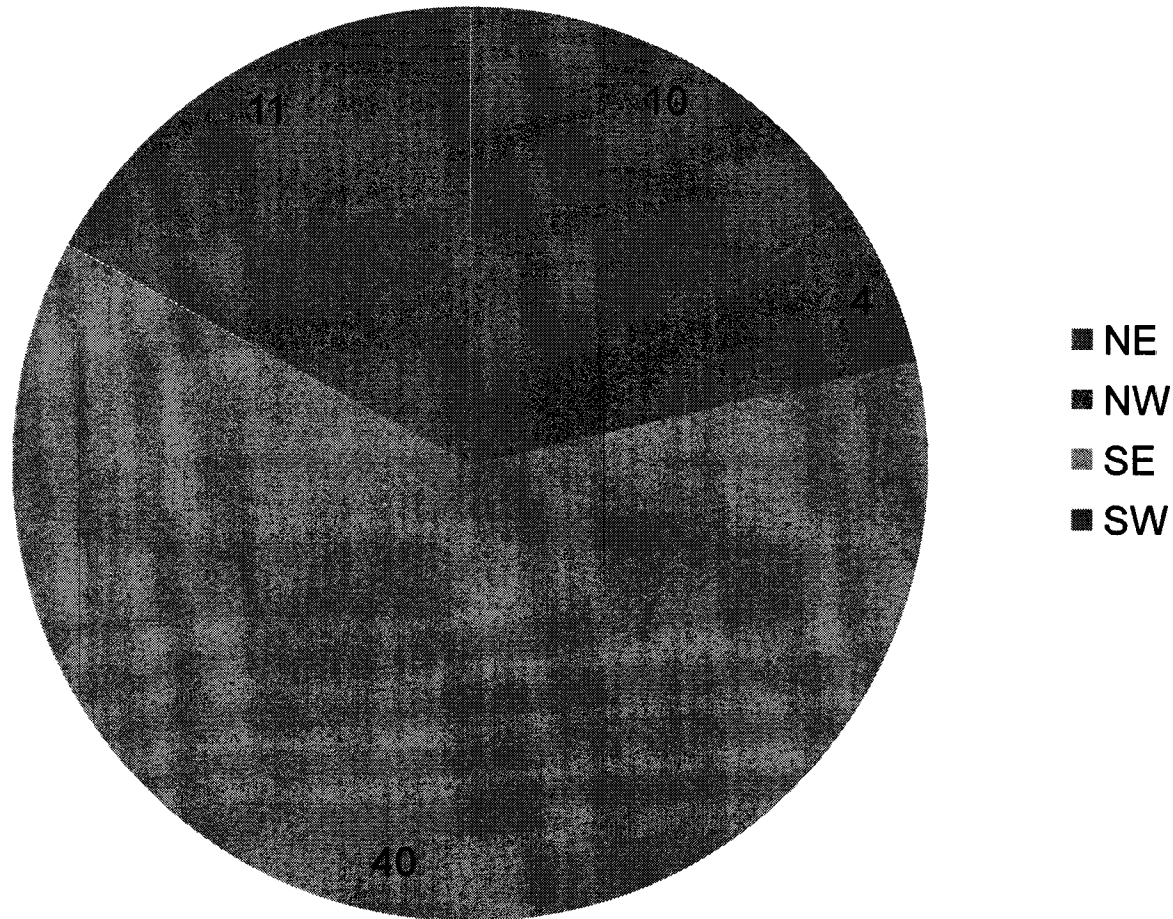
- **If the entire market NE heating oil market shifts to low sulfur, PADD 1 refiners will need to upgrade nearly 50 percent of their current distillate production.**
- **Inland refiners appear not to produce higher sulfur distillate grades**
 - *Implies that most of the heating oil supplies to western PA are produced and shipped in eastern refineries.*
- **PA is a net exporter of ULSD to northern PADD 1**
 - *In 2008, about 34,000 bpd was sent to other states*
- **Very little ULSD from PADD 3 moves north of VA**
 - *PADD 3 does supply substantial heating oil volumes north of VA. A move to low sulfur would displace current heating oil shipments.*

PA Distillate Demand

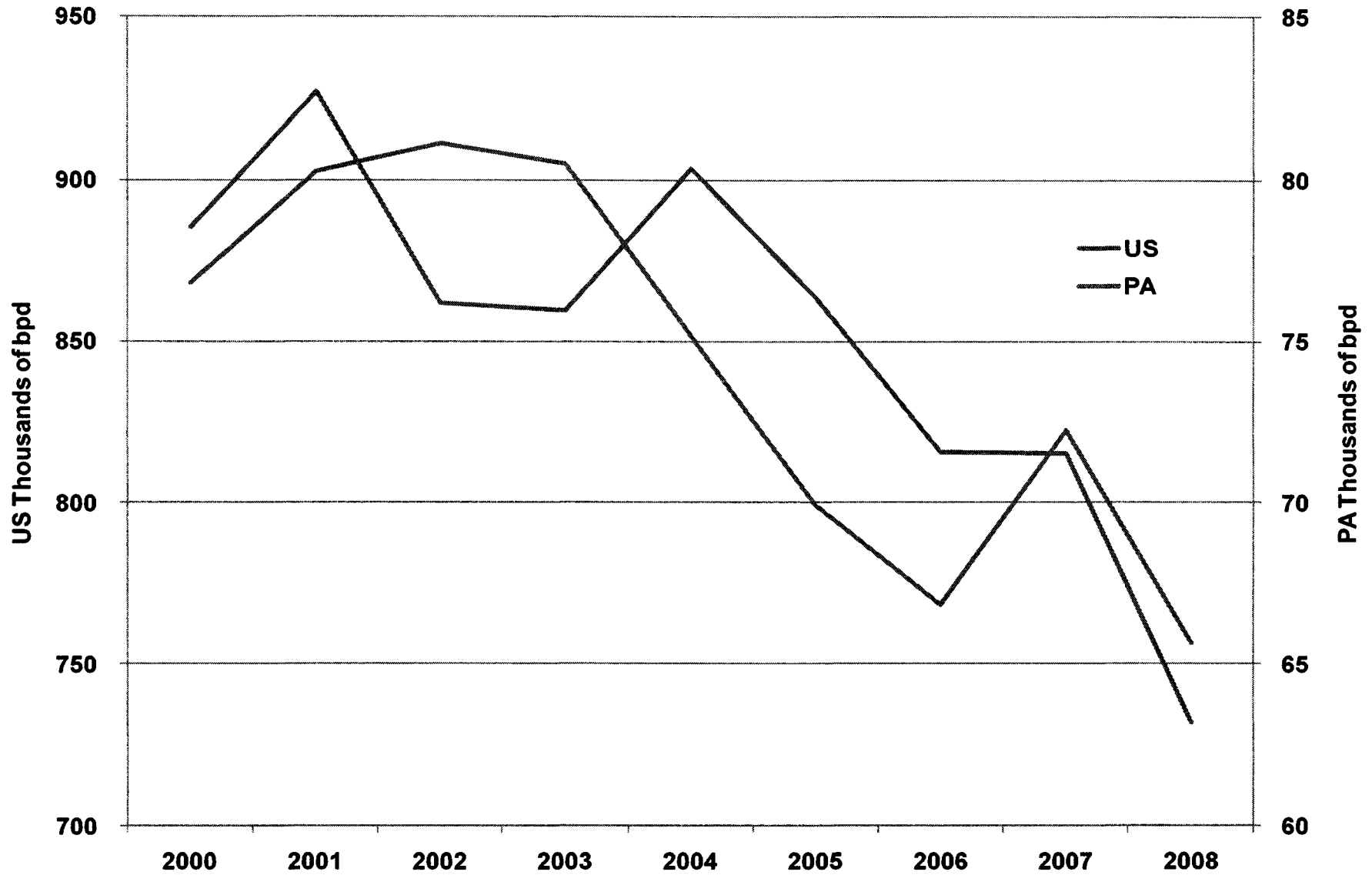
- **Diesel demand in PA has been declining since 2005. it follows that economic recession is not the reason for the end of growth in diesel demand.**
 - *Recession likely was the main reason for the decline in diesel demand in 2009. 2008 drop in demand was due to high prices and recession.*
 - *Higher diesel prices beginning in 2004/2005 increased the efficiency of use. This will continue to a factor in future years.*
- **Less than 1/3 of PA heating oil demand is in the western half of the state.**
- **PA is losing distillate demand at about the same rate as the overall US market.**
 - *PA residential demand is about 13% of the US total residential demand.*

PA Heating Oil Demand by Region

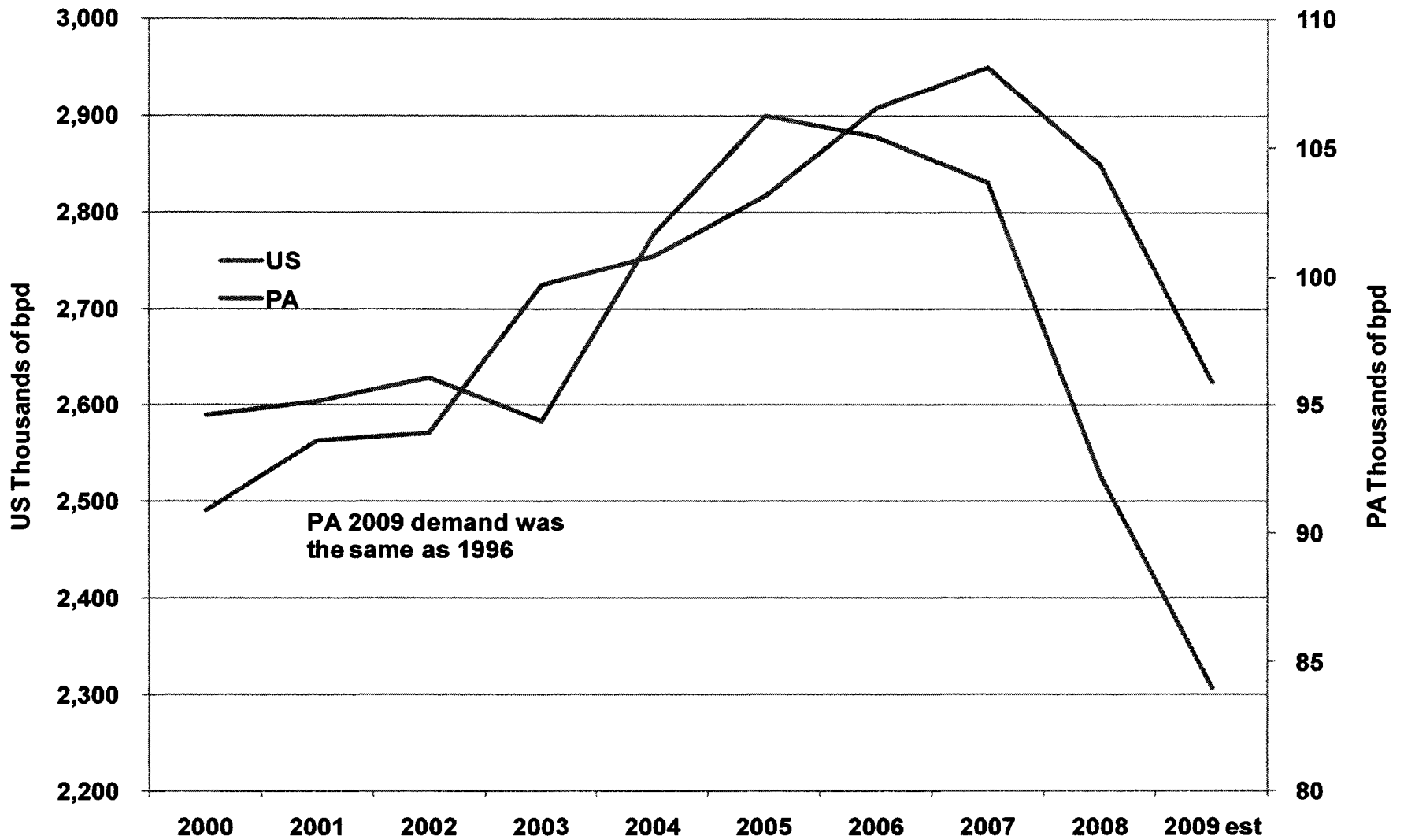
Residential/Commercial (thousands of bpd)



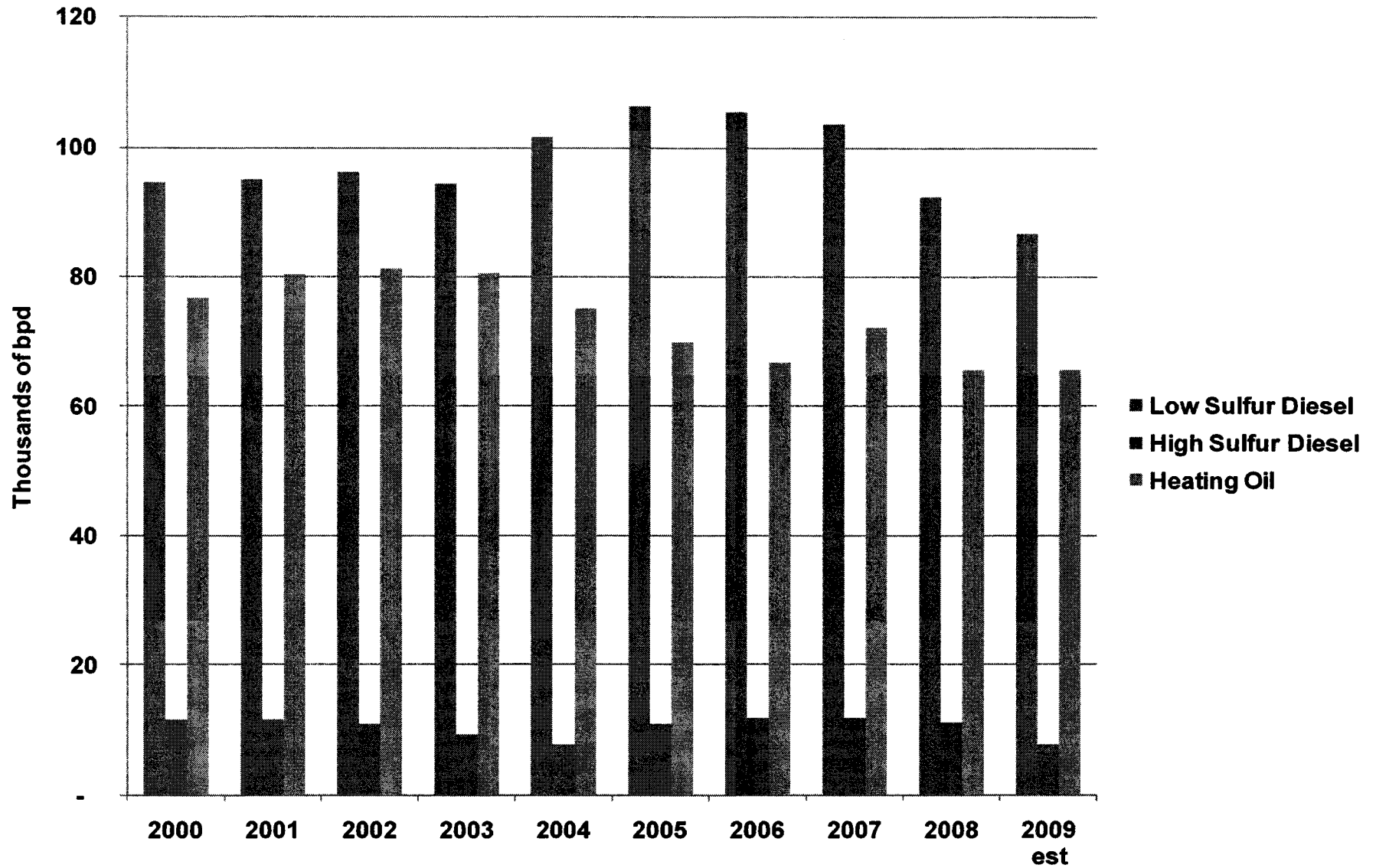
PA Heating Oil Demand: Matches the US Trend



On Highway Diesel Demand: PA is a Mature Market



PA Distillate Demand by Quality

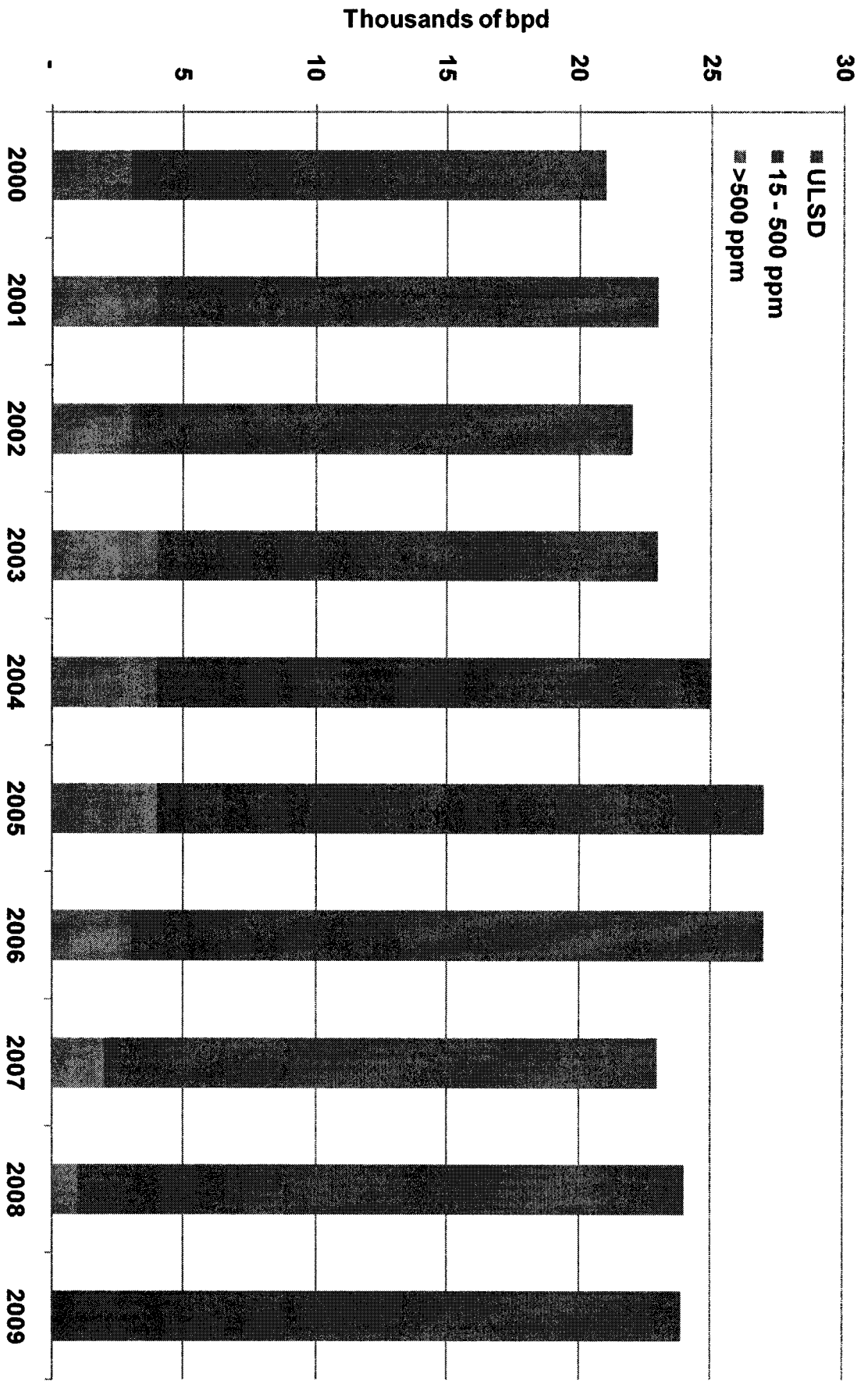


Refinery Production

- **Inland refiners contribute very little to the overall supply in PA and PADD 1.**
 - *These refiners appear to have shifted away from producing distillate streams over 500 ppm sulfur*
- **Coastal refiners in PADD 1 have nearly eliminated high sulfur diesel production.**
 - *Heating oil production is declining commensurate with demand trends.*
- **Investment will be needed to shift heating oil production to lower sulfur**

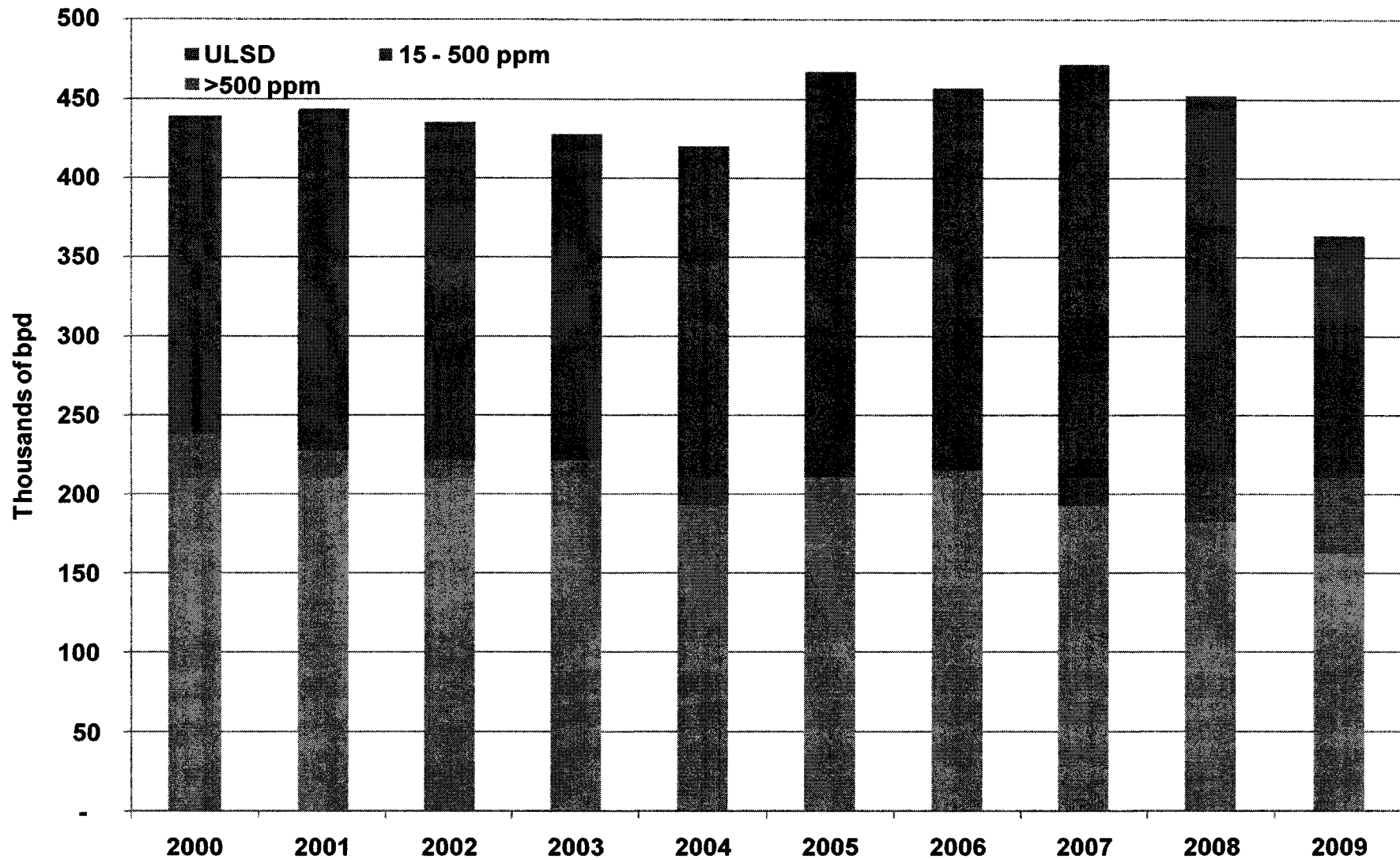
PADD 1 Inland Refinery Distillate Production

Source: EIA



PADD 1 Coastal Refinery Distillate Production

Source: EIA

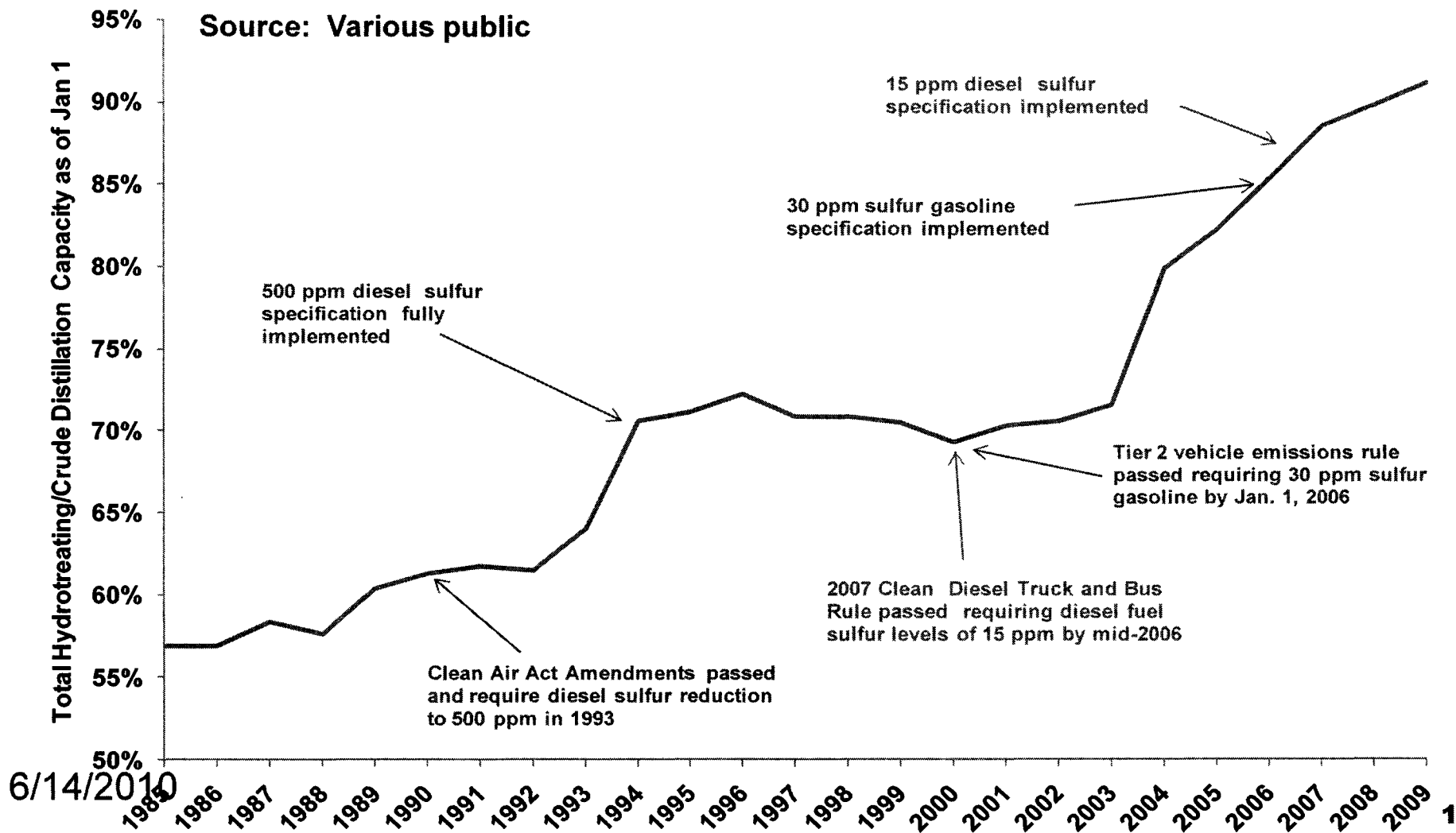


Refining

- **Refiners will need market and/or regulatory signals before making investments to upgrade heating oil to ULSD.**
- **Past changes in refined products specifications were largely driven by environmental requirements. In all cases, the refining industry has met the regulations.**
- **Gasoline/diesel demand mix is changing:**
 - *CAFÉ standards, biofuels, mature fundamentals*
 - *Refiners will be under sustained pressure to reduce gasoline production and increase distillate production*

6/14/2010

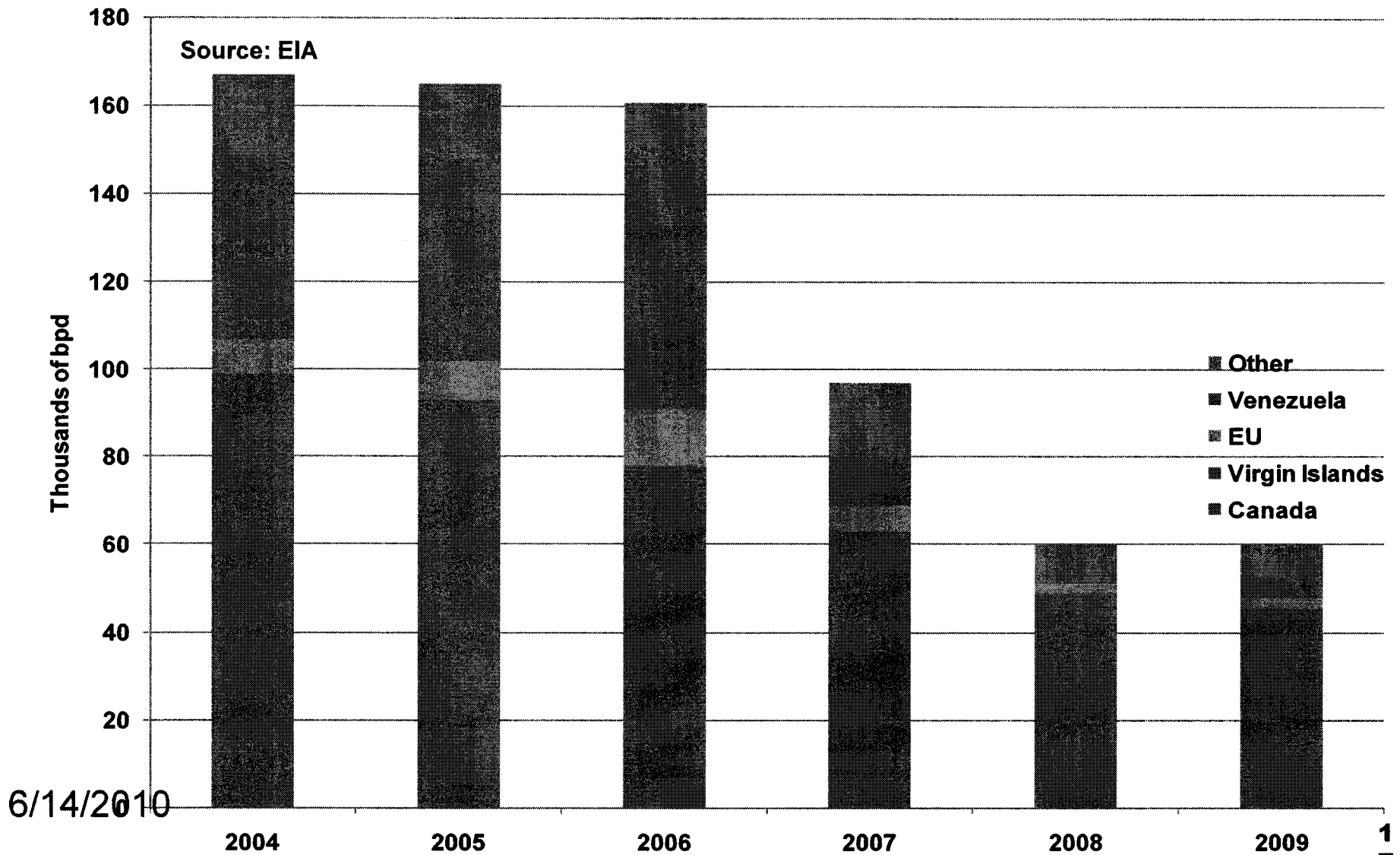
US Refining Hydrotreating Capacity is Driven by Regulatory Changes



Imports/Exports

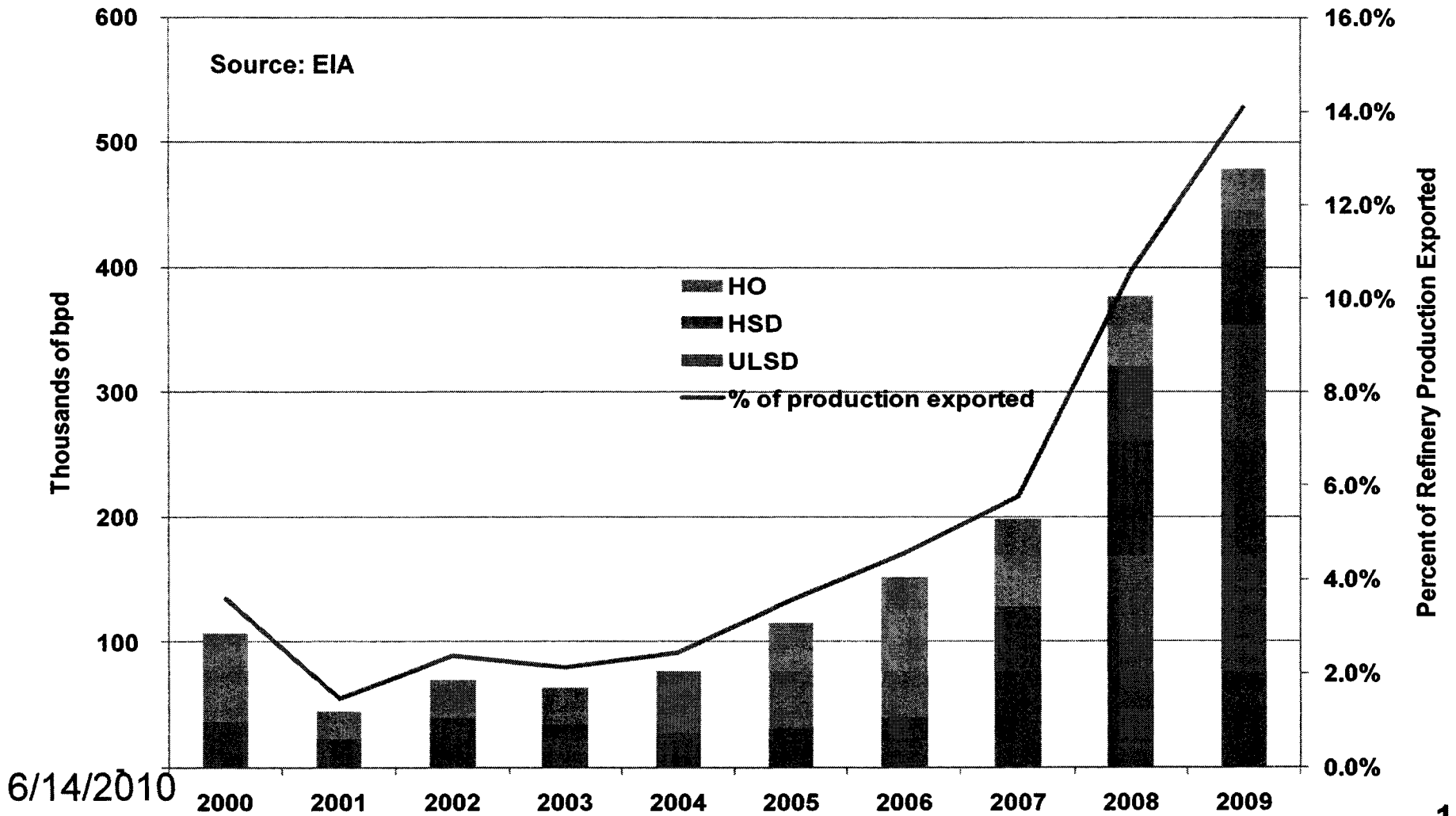
- **Nearly all of the imports of heating oil to PADD 1 are into the NY and north market.**
- **US exports of diesel fuel have been rising for the past several years.**
 - *ULSD exports average between 150,000 and 200,000 bpd*
- **If PA moves to ULSD heating oil, the equivalent of about 1/3 of current US ULSD exports would be required to meet the increase in demand from PA.**
 - *Volume could be supplied from either PA refineries or the USGC or both in some combination.*

PADD 1 Heating Oil Imports (>500 ppm sulfur)



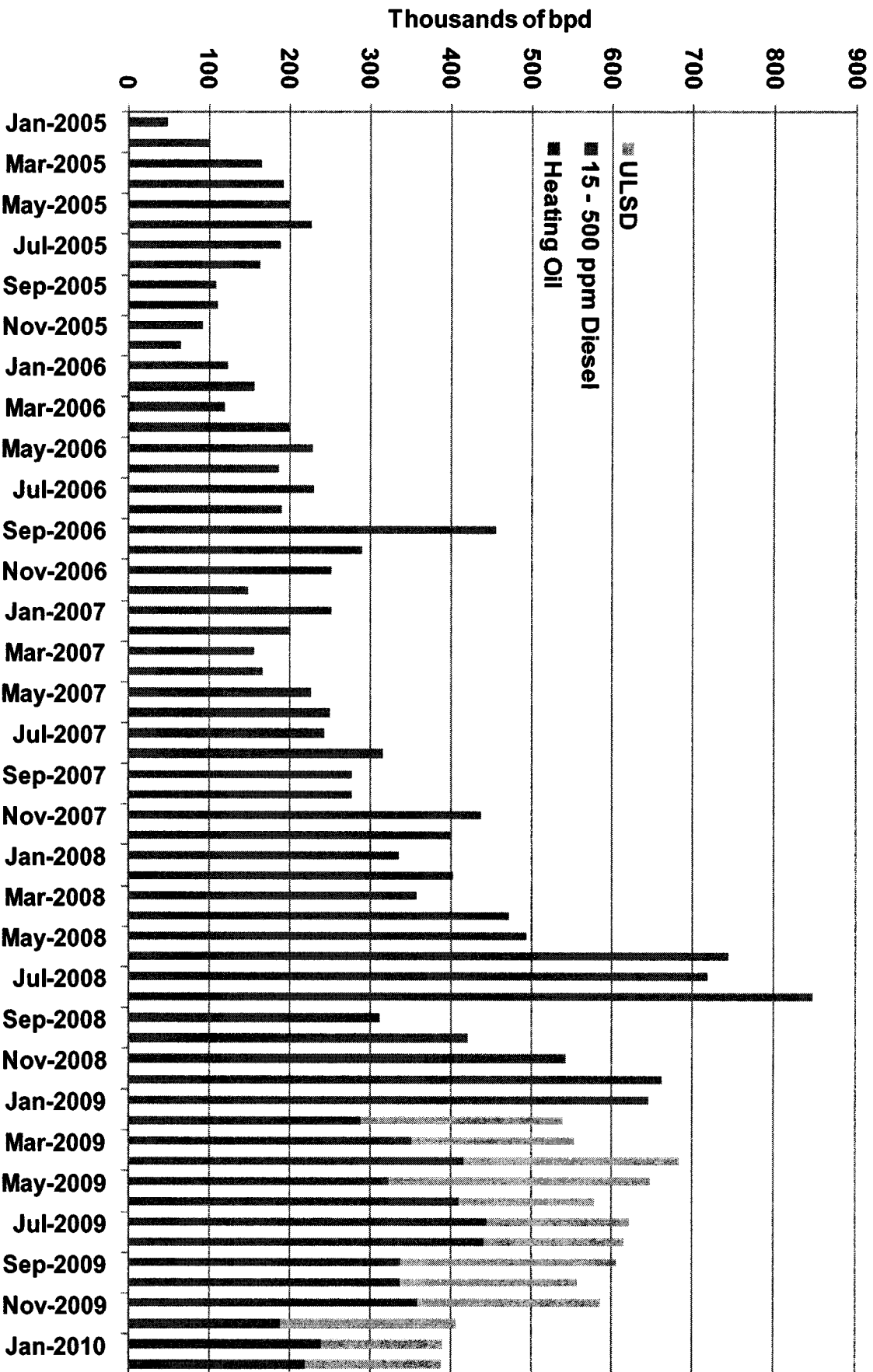
6/14/2010

PADDs 1, 2, and 3: Distillate Exports on the Rise



6/14/2010

US Distillate Exports



Distillate Balance

- **PA is a net exporter of ULSD to other states.**
- **PA heating oil demand is about double the amount of ULSD that is exported to other states.**
 - *A shift to low sulfur heating oil would require supplies from the USGC market. The USGC market currently exports the equivalent of about 3x PA heating oil demand.*

Distillate Balance

- **ULSD is currently not imported into northern PADD 1 from PADD 3 in large quantities.**
 - ***The northern PADD 1 ULSD market is nearly completely supplied from local refinery production and imports from Canada and USVI which are low cost supply sources.***
 - This implies that these sources of supplies are lower cost than USGC since the USGC currently exports ULSD.
 - However, since small amounts of ULSD are moved from PADD 3 to northern PADD 1, it is unlikely the cost of ULSD would increase significantly should a shift to low sulfur heating oil be made.

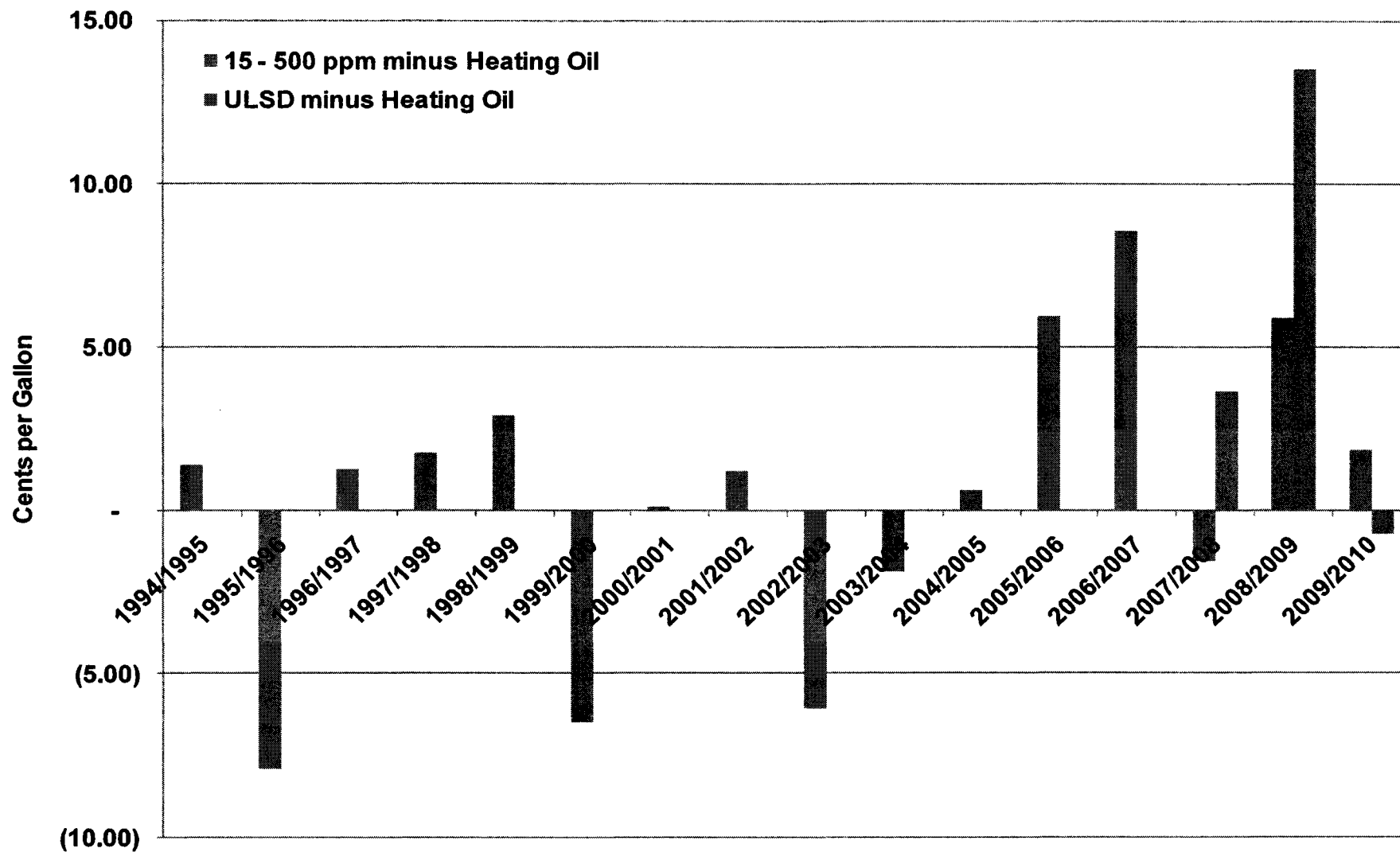
Estimated ULSD and Heating Oil Supply/Demand Balance 2008

Ultra Low Sulfur Diesel					
Thousands of bpd	Demand	Refinery Production	Supply from PADD 3	Supply To PADD 1	Foreign Imports
VA South	370	20	318	-	32
North of VA	346	242	30		77
PA	92	125		(34)	1
Heating Oil					
Thousands of bpd	Demand	Refinery Production	Supply from PADD 3	Supply To PADD 1	Foreign Imports
VA South	83	-	80	-	2
North of VA	360	183	101	-	68
PA	66	93	-	(30)	2
Source: EIA, KJL LLC					

Low/High Sulfur Price Differential

- The price difference between diesel fuel and heating oil began to widen in the winter season of 2005/2006 which is before the ULSD specification.
 - *It follows that ULSD is not the reason for the wider diesel fuel premium over heating oil.*
- The main reasons for the wider differential were a convergence of non-repeating factors:
 - *Strong global demand*
 - *Several Atlantic Basin markets moving to lower sulfur diesel at relatively the same time as the US.*
 - *Continued refinery operating issues in the USGC from hurricanes and other outages*
- Price differentials have now fallen back to the historic average trend.

Mid-Atlantic Wholesale Diesel Premium to Heating Oil: Volume Weighted Winter Season



Consumers will Benefit from Low Sulfur Heating Oil

- **Consumers will save money on heating oil from a shift to low sulfur in two ways:**
 - *Lower service costs: NORA estimates annual savings from lower service costs to be on the order of \$50/household*
 - *Higher Efficiency: ULSD burns more efficiently in boilers. For the purposes of this study, an improvement of 2% was used. However, higher levels have been reported*
- **Taking efficiency and service savings into account, if a consumer had used low sulfur heating oil in any year in the past, the total cost would have been lower than using high sulfur.**

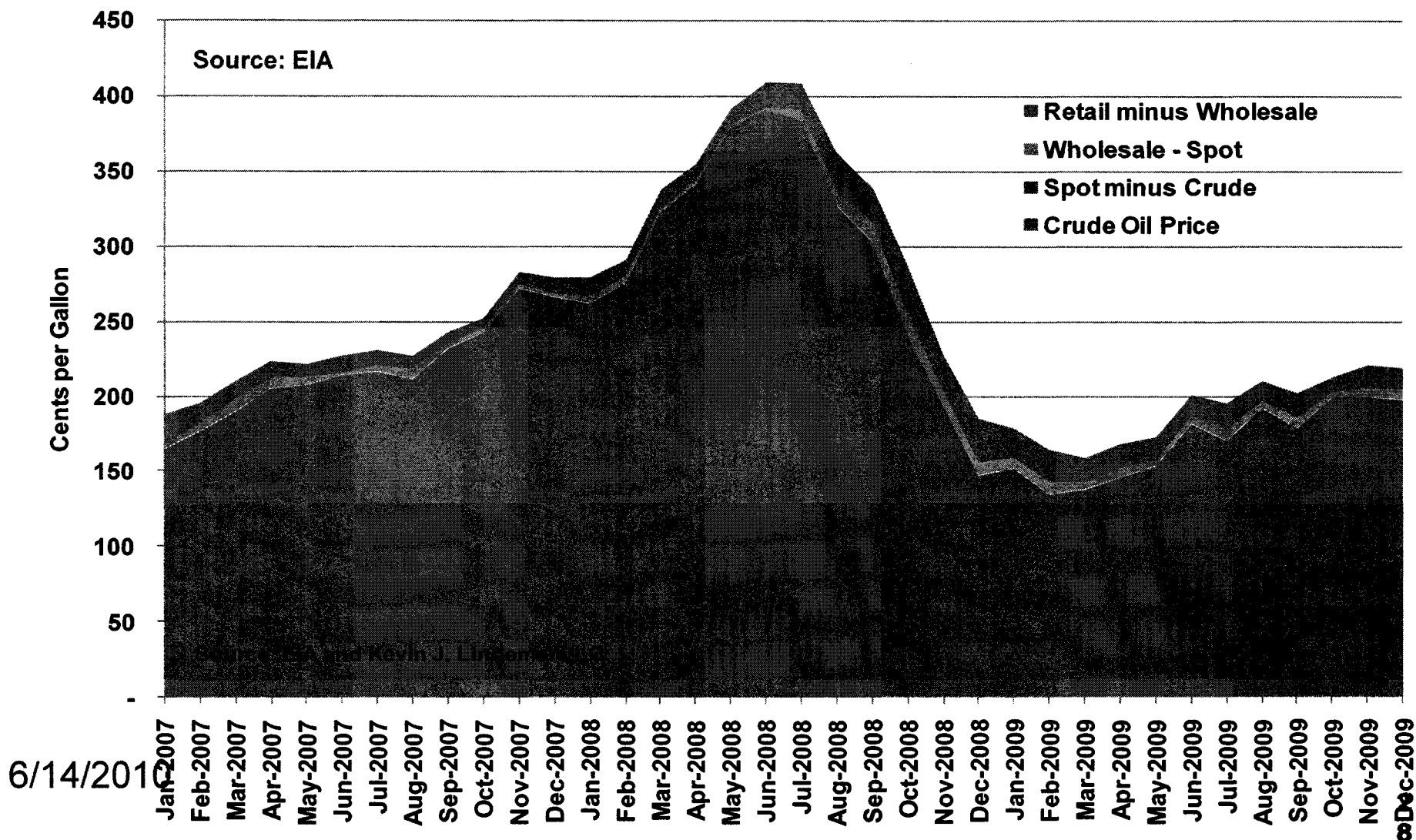
Consumers will Benefit from Low Sulfur Heating Oil

- If heating oil prices average \$3.00/gal, a home using 600 gallons per year would save about \$0.14 per gallon by using USLD instead of heating oil.
- Crude oil price and volatility continue to be the major driver for heating oil prices.

Consumer Benefit from Low Sulfur

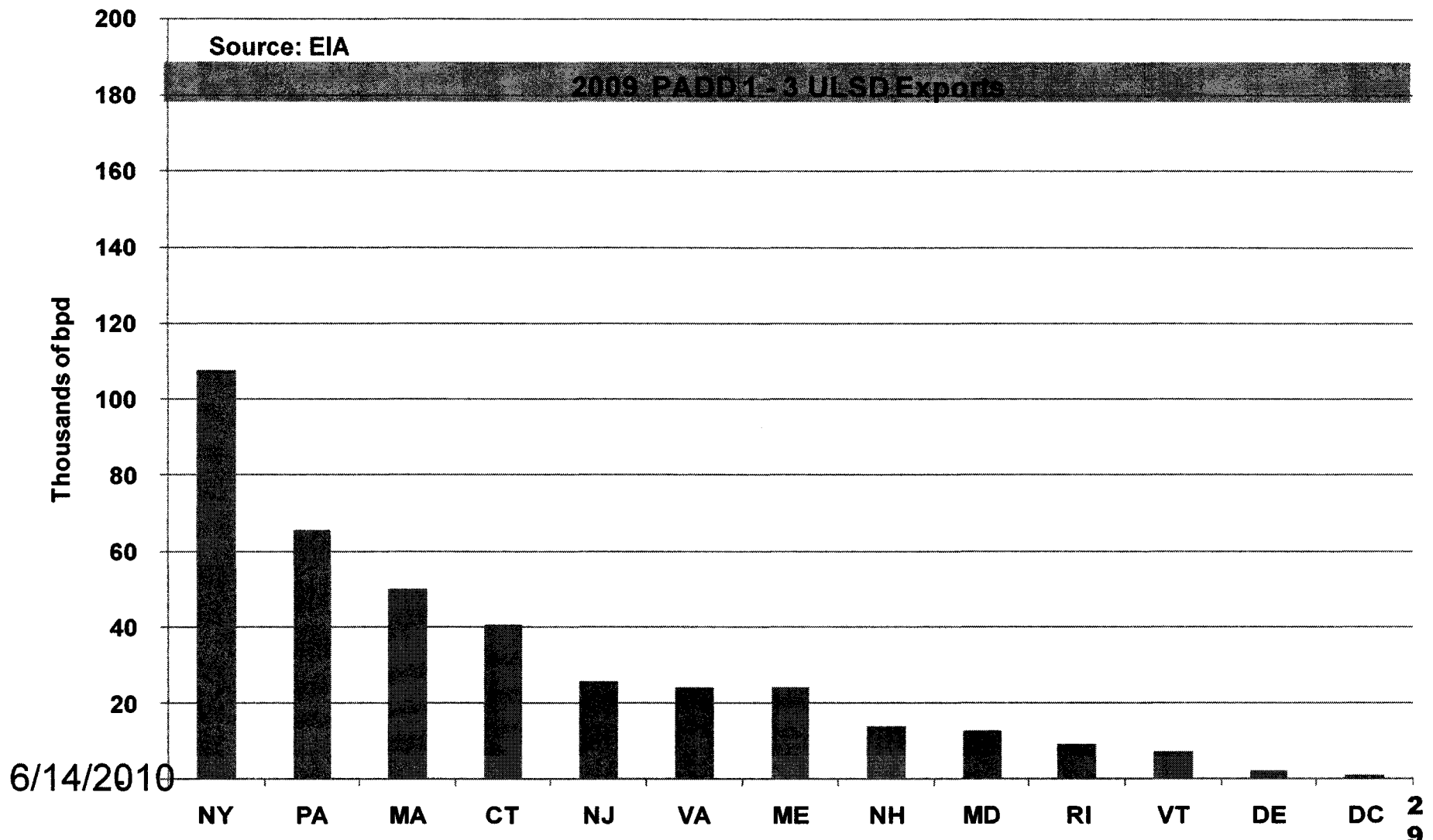
Assumptions	600	gal/year	
Residential Price	\$ 3.00	per gallon	
Customer Annual Cost Today	\$ 1,800		
Service Savings	\$ 50	Source: NORA	
Efficiency Savings	\$ 36	2% improvement	
Customer Annual Cost with low sulfur heating oil	\$ 1,714		
Savings per gallon	\$ 0.14		

PADD 1 ULSD Estimated Price Components (excluding taxes)



6/14/2010

Estimated 2008 State Level Heating Oil Demand Compared to ULSD Exports



*"Knowledge & Experience
Working for You"*

KEY CONCLUSIONS OF PPMCSA PA HEATING OIL SUPPLY STUDY

US SUPPLY OF ULTRA LOW SULFUR DIESEL IS ADEQUATE FOR PENNSYLVANIA TO ESTABLISH A 15 PPM HEATING OIL STANDARD IN 2011.

1. PENNSYLVANIA HEATING OIL DEMAND IS APPROXIMATELY 66,000 BPD
2. US REFINERS HAVE BEEN EXPORTING BETWEEN 150,000 AND 200,000 BPD OF ULSD.
3. PENNSYLVANIA ITSELF IS A NET EXPORTER OF ULSD (34,000 BPD 2008) TO OTHER STATES.
4. PENNSYLVANIA WOULD NEED APPROXIMATELY 1/3 OF ULSD OF US ULSD EXPORTS UNDER EXISTING STANDARDS TO MEET ITS HEATING OIL NEEDS.

PENNSYLVANIA CONSUMERS WOULD REALIZE SAVINGS OF AT LEAST 14 CENTS PER GALLON IN EXISTING FURNACES BY IMPLEMENTATION OF THE 15 PPM STANDARD.

THIS CONSERVATIVE ESTIMATE IS BASED ON THE SIGNIFICANT IMPROVEMENT IN BURNING EFFICIENCY AND RESULTING LOWER SERVICE COSTS NEEDED FOR FURNACES RUNNING ON ULS FUEL COMPARED TO CONVENTIONAL HEATING OIL.

THIS IS, ON AVERAGE, A SAVINGS OF \$86 A YEAR FOR THE PENNSYLVANIA OILHEAT CONSUMER OR \$86,000,000 AGGREGATE FOR THE STATE'S 1 MILLION OILHEAT HOUSEHOLDS.

FROM DATA COMPILED: PENNSYLVANIA HEATING OIL MARKET STUDY PREPARED FOR PENNSYLVANIA PETROLEUM MARKETERS AND CONVENIENCE STORE ASSOCIATION, MAY 26,2010. KEVIN J LINDEMER LLC

Delaware Refinery to Reopen with Plans to Produce Low-Sulfur Heating Oil and Biofuels

Posted by Josh Garrett on June 2, 2010 at 11:32 am

Thomas O'Malley and his PBF Energy Partners have provided Delaware's economy with a shot in the arm by purchasing the refinery in Delaware City.

In November of last year, as slumping demand for refined products shrunk the refining industry's revenue stream to a trickle, Valero shut down its Delaware City refinery. The permanent closure of the facility dealt a huge blow to Delaware's economy and resulted in the loss of 550 jobs.

In an uplifting and somewhat surprising turn, the new owner of the refinery announced on Tuesday that it would not only re-open the plant, but also improve and expand it. DelawareOnline.com reported that PBF Energy Partners finalized its purchase of the refinery and announced at a ceremony marking the event that it would expand the refinery's use to include the production of biodiesel, ethanol, and low-sulfur heating oil.

After the plant's closing, Valero had planned to demolish it, as it had been fraught with maintenance issues. This led governor Jack Markell to search for a new buyer to salvage the facility. The governor's efforts helped bring in PBF Energy Partners, a joint venture headed by energy industry veteran Thomas D. O'Malley. PBF bought the refinery from Valero for \$220 million.

At the transfer of ownership ceremony, O'Malley announced that PBF had plans to spend \$500 million on a new wing of the plant that will produce low-sulfur heating oil and also significantly reduce the facility's greenhouse gas emissions. The announcement seems to have come as a direct result of legislative and industry trends that call for a major upswing in the production of the low-sulfur fuel. While some refiners aligned with Big Oil have resisted the trend, O'Malley made clear that his company plans to be the first in the industry to embrace it, saying, "We're going to come out publicly as the first refining company to support low-sulfur heating oil." The fact that the European affiliate of PBF, Petroplus, which is also headed by O'Malley and is Europe's largest independent refiner, already produces low-sulfur heating oil makes the transition that much easier.

O'Malley went further in staking out his company's forward-thinking position in the industry by announcing plans to eventually produce ethanol and biodiesel at the newly-purchased refinery:

From our perspective, biofuels are a reality. They're going to be around for a long time, and we're going to be pushing second-generation ethanol production here and trying to put a facility here.

As for the refining jobs lost when the plant closed in November, PBF had more good news. The Delaware City Refining Co. that it created to operate the plant has already begun a \$130 million inspection and refurbishment initiative that will create 700 jobs. When the refinery returns to normal operation (which could happen as early as April of 2011), it will employ some 700 full-time and contract workers.

Will the reopening of the Delaware City plant mark the beginning of a revitalization of the US refining industry and gradual transition to producing more green fuels? If so, the still-sluggish economy and low demand for petroleum products will likely hinder the process for months or even years to come. In the meantime, however, heating oil users should be glad that a heating oil producer with an eye on the future will reopen right here in the Northeast, giving a boost to local economies and helping to ensure ample supplies of heating oil (low-sulfur and otherwise) for winters to come.

2874

Cooper, Kathy

From: Gail Craig [GCraig@ppmcsa.org]
Sent: Monday, November 29, 2010 1:28 PM
To: EP, RegComments
Subject: Comments On Proposed Rulemaking Commercial Fuel Oil Sulfur Limits for Combustion Units
Attachments: Comments to Environmental Quality Board 11-29-10.pdf

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