

**From:** ecomment@pa.gov  
**Sent:** Monday, July 15, 2019 10:43 AM  
**To:** Environment-Committee@pasenate.com; IRRRC; eregop@pahousegop.com; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov  
**Cc:** c-jflanaga@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: Revision of the Maximum Allowable Sulfur Content Limit for No. 2 and Lighter Commercial Fuel Oil



**Re: eComment System**

**The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Revision of the Maximum Allowable Sulfur Content Limit for No. 2 and Lighter Commercial Fuel Oil.**

**Commenter Information:**

Bruce Limbert  
Moyer Indoor Outdoor (Bruce.Limbert@emoyer.com)  
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Souderton, PA 18964 US

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**Comments entered:**

Pennsylvania is the only state in the Mid Atlantic and New England region who has not yet adopted a ULSHO standard. As a petroleum marketer I fully support aligning our state with the rest of the region to achieve improved air quality and cleaner fuel. Not doing so, creates an unequal playing field for companies that serve two different sulfur requirement areas as well as distribution and storage issues. The change will not require any equipment changes or modifications by the users. In fact 15 PPM sulfur fuel will reduce the maintenance requirements for the user. Using ULSHO containing less than 15 ppm lowers sulfur oxide emissions in the flue gas by more than 97% compared to heating oil with 500 ppm sulfur, and produces sulfur oxide emissions that are comparable to natural gas heating equipment. With the addition of a Bio fuel component oil can reduce Greenhouse emissions lower than either Natural Gas or Propane.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley