

# 3238

**Cheryl Yohn**

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**From:** ecomment@pa.gov  
**Sent:** Monday, August 12, 2019 2:43 PM  
**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



The enclosed comment was received as part of the following testimony:

**Testimony name:** Public Hearing - #7-546 (8/7)  
**Testimony date:** 8/7/2019 12:00:00 AM  
**Testimony location:** Norristown, PA

**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:**

Kate Duffey  
D.E. Duffey & Sons (kate@deduffey.com)  
P.O. Box 763  
Plymouth Meeting, PA 19462 US

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**Comments entered:**

Testimony provided on August 7, 2019

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These links provide access to the attachments provided as part of this comment.

Comments Attachment: [Duffey testimony 8 7 19.pdf](#)

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
Director, Office of Policy  
PA Department of Environmental Protection

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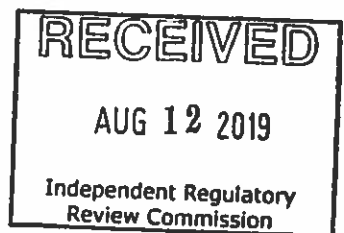
3238

# D. E. DUFFEY & SONS, INC.

FUEL OIL • HEATING • COOLING • OIL & GAS HEATING INSTALLATIONS

P.O. Box 763 (Office 1982 Butler Pike) • Plymouth Meeting, PA 19462  
Phone: (610) 940-1400 • Fax: (610) 940-1404 • [www.deduffey.com](http://www.deduffey.com)

PA Home Improvement Contractors #PA001895



PA Department of Environmental Protection  
2 E. Main St  
Norristown, PA 19401

To Whom it May Concern:

My name is Kate Duffey, Manager of D.E. Duffey & Sons and President of the Delaware Valley Fuel Dealers. I am the 4th generation of the Duffey family to work in the business started in 1898. We are a full-service fuel oil and HVAC company. We serve Montgomery, Chester, Philadelphia and Delaware counties. A lot has changed in 120 years but what has remained the same is my family's commitment to our customers to provide the best service and keeping their best interest in mind.

I fully support the transition from 500 parts per million sulfur to 15 parts per million sulfur. As Pennsylvania is the only state in the Mid-Atlantic/Northeast Visibility Union (MANE-UV) who has not fully adopted a ULSHO we have been able to witness the positive effects it has had in these states.

The transition will reduce soot accumulation, which will keep our customer heating systems running cleaner and reduce the number of service calls they might have with higher sulfur content. This will help the customer save on their heating bills. Also, the customer will not need to change their current heating system, as ultra-low sulfur is compatible with all existing all heat equipment.

Using ULSHO containing less than 15ppm lowers sulfur emissions in the flue gas by more than 97% compared to heating oil with 500ppm sulfur and produces sulfur emissions that are comparable to natural gas heating equipment.

We witness this firsthand when Philadelphia made the transition to 15 ppm a few years ago. Since then we have been delivering ULSHO and our customers have seen all the benefits listed above.

With all this being said, I fully support the state moving to 15 ppm. Please feel free to contact me should you have any questions or would like to have further discussion.

Thank you,

Kate Duffey  
D.E. Duffey & Sons  
[kate@deduffey.com](mailto:kate@deduffey.com)  
610-940-1400

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