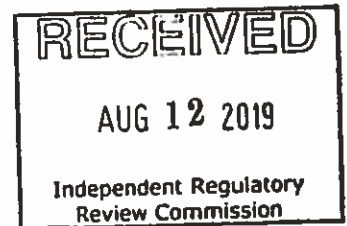


3238

Cheryl Yohn

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-jflanagan@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 (8/8)
Testimony date: 8/8/2019 12:00:00 AM
Testimony location: Harrisburg, 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:

Leonard Zvorsky
South Central Pennsylvania Energy Association (scpea4@gmail.com)
1265 Tumblestone Dr.
Mount Joy, PA 17552 US

Comments entered:

Testimony provided on August 8, 2019

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

Comments Attachment: [SCPEA Zvorsky testimony 8-8-19.pdf](#)

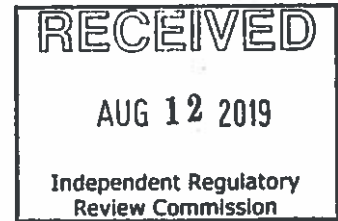
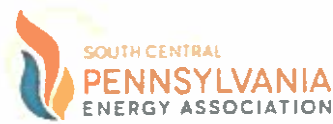
Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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

Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov

3238



August 8th, 2019
PA Department of Environmental Protection
900 Elmerton Ave.
Harrisburg, Pa. 17110

My name is Leonard Zvorsky, Executive Director of the South Central Pennsylvania Energy Association (SCPEA). The SCPEA consist of 31 Oil Heat Dealers and 27 Associate Members. Our footprint includes Franklin, York, Adams, Cumberland, Dauphin, Perry, Lancaster and Lebanon Counties. Our association supports the conversion from 500 parts per million to 15 parts per million fuel for the several reasons below:

The transition from 500 ppm to 15 ppm ultra-low sulfur heating oil (ULSHO) will reduce soot accumulation which will accelerate keeping heating systems cleaner. This will allow cleaner systems resulting in higher efficiency and reduced service calls.

ULSHO is compatible with existing oil heat equipment, so our customers won't need to install new heating equipment to use ULSHO.

The 15 ppm fuel for heating purposes will aid in our transportation logistics. It will enable our members to deliver to multiple locations for off-road diesel and heating oil on the same delivery truck, therefore eliminating several trips to the same regional area.

Converting to 15 ppm heating oil will also eliminate additional storage tanks at bulk plants and loading terminals thus adding capacity for storage.

Finally, the SCPEA feels converting Pennsylvania to 15 ppm is a winning formula from an environmental and logistical standpoint.

Respectively Submitted,

Leonard Zvorsky, scpea4@gmail.com

Executive Director

South Central Pennsylvania Energy Association
1265 Tumblestone Dr., Mount Joy, Pa. 17552
717-892-2209

3238

Cheryl Yohn

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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-jflanagan@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 (8/8)
Testimony date: 8/8/2019 12:00:00 AM
Testimony location: Harrisburg, 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:

Michael McCarthy
Shiple Energy (mmccarthy@shipleenergy.com)
415 Norway Street
York, PA 17403 US

Comments entered:

Testimony provided on August 8, 2019

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

Comments Attachment: [Shipley McCarthy testimony 8-8-19.pdf](#)

Please contact me if you have any questions.

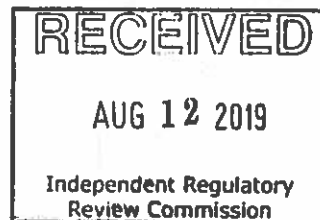
Sincerely,
Jessica Shirley

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

Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
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415 Norway Street, York, PA 17403
Tel: 800.839.1849
shipleenergy.com

3238



August 7, 2019

I am Michael McCarthy and I'm the Assistant to the Chairman of the Board of Shiple Energy. Shiple Energy is an energy marketer serving approximately 75,000 customers in Pennsylvania, the Northeast, Mid-Atlantic and New England states. Shiple Energy is headquartered in York, Pennsylvania, and we have just celebrated our 90th year in business.

I am here today to support the lowering of the sulfur content of home heating oil from 500ppm to 15ppm in Pennsylvania. The use of Ultra Low Sulfur Heating Oil, 15ppm, in Pennsylvania will result in the reduction of haze pollution and sulfur dioxide emissions in the commonwealth. This increase in air quality will benefit all citizens of Pennsylvania and be a positive change to the environment in which we live. Adoption of the 15ppm standard for heating oil will align Pennsylvania with all the other members of MANE-VU that have already adopted the 15ppm standard.

The 15ppm standard is currently in force for all diesel fuel used in Pennsylvania. This 15ppm diesel fuel is used by highway and off-highway trucks, construction equipment, locomotives and marine power vessels. Adopting the 15ppm standard for home heating oil will achieve consistency and uniformity in Pennsylvania fuels. Because of this fuel uniformity, fuel suppliers will be able to achieve increased delivery and bulk storage efficiencies.

Homeowners that use 15ppm heating oil experience less maintenance problems and service calls compared to homeowners that use 500ppm heating oil. This is the consensus of service companies serving the Philadelphia area where 15ppm heating oil was mandated in 2014.

Shiple Energy buys and loads heating oil supplies at many terminals in Pennsylvania and other states. We have found that 15ppm is generally slightly higher in price than 500ppm. We have also seen 15ppm prices lower than 500ppm. Any slightly higher price to the consumer, should be recovered by the decreased repair and maintenance costs for the homeowner.

Shiple Energy heartily endorses the efforts of Pennsylvania DEP to lower the sulfur content of heating oil to 15ppm. It will be a win/win for the environment, consumers, fuel suppliers and all citizens of the Commonwealth of Pennsylvania.