



**ASSOCIATED PETROLEUM INDUSTRIES
OF PENNSYLVANIA**

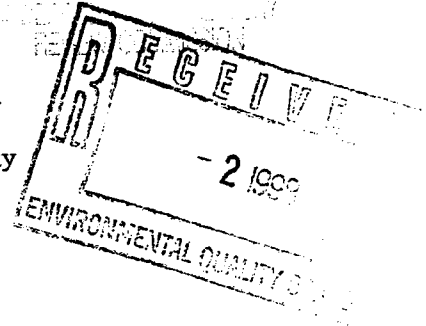
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EUGENE M. BARR
Executive Director

December 1, 1998

MARY M. KEENAN
Associate Director

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Environmental Quality Board
15th Floor
Rachel Carson State Office Building
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Proposed Amendments to Gasoline Volatility Requirements
for the Pittsburgh Area

Dear Sirs:

Associated Petroleum Industries of PA (APIP) appreciates the opportunity to comment on the proposed amendments to the gasoline volatility requirements for the Pittsburgh area. APIP is the trade association for the major oil companies, which supply fuel to the Pittsburgh market.

APIP and its member companies support the move by the Department to require all gasoline sold in the Pittsburgh area to comply with the 7.8 psi standard. In fact, APIP stated during the stakeholder process in 1996 that a low RVP fuel was the most cost-effective option for the area.

We would suggest the following changes be incorporated in this proposal:

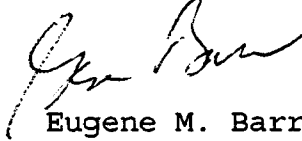
In 126.301 (b), terminals are required to comply with the 7.8 psi requirement by May 1. In a previous appearance before the Department's Air Quality Technical Advisory Committee, we recommended that it was unnecessary to require terminals to be held to a May 1 date for low RVP fuel. Terminals typically do not need a full month to 'turnover' retail facilities to 7.8 by June 1. Such a requirement results in additional cost without real benefit for consumers. We would recommend that the Department set a date of May 15 for terminal compliance with the 7.8 psi requirement.



In 126.302 (c), the Department has proposed that all points in the gasoline distribution network be required to keep records onsite. If this means that retail outlets must keep records on their premises for two years, then we would ask the Department to modify that rule. Retail outlets typically have little storage space on site. However, the desired records could be readily obtained from other sources (supplier, district office, etc.) with a small amount of lead-time. We encourage the Department to make this modification.

Thank you for the opportunity to comment on this proposal. Please contact this office if you have questions or would like to discuss the comments further.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eugene M. Barr".

Eugene M. Barr
Executive Director