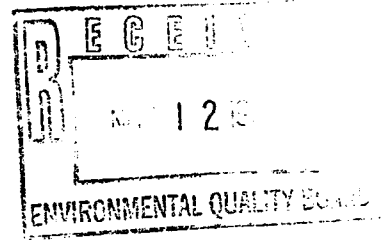


EXXON COMPANY, U.S.A.

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November 9, 1998

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

**RE: Gasoline Volatility Requirements
Proposed Amendments to Chapters 121, 126 and 139**

Dear Gentlemen/Ladies,

Exxon Co. - Marketing Department appreciates the opportunity to submit the following comments on the proposed amendments to the Gasoline Volatility Rules;

- 126.302 (c) Delete point in the distribution network and insert **Distributor's facility. Retailer and Wholesale Purchaser - Consumer records shall be made available within 24 hours of the Department's request.**
This change is needed because at a typical Retail Facility, ie. service station or convenience store, there is no room or space to store delivery invoices for two years. These records are generally available from a dealer's home or a company's central storage facility.
- 126.301 (b) Although the proposal does not include any amendments to this section, we have been told that there has been some discussion about changing this section to allow terminals or blending facilities to sell, exchange or supply non-compliant fuel until May 31, ie. a terminal would not have to deliver 7.8 RVP fuel to a retailer/wholesale consumer-purchaser until June 1. We would not support this kind of an amendment.
The existing rule requires that retail and wholesale purchaser-consumer facilities be fully converted to 7.8 RVP fuel by June 1 and they are only allowed to sell 7.8 RVP fuel starting June 1. This requires that terminals and blending facilities be fully converted to 7.8 RVP fuel at least 15-30 days in advance of June 1 so that the retail facilities have sufficient time to convert their storage tanks to 7.8 RVP fuel, ie. May 15 or May 1. The existing rule requires terminals to be converted by May 1 (incidentally, this is also required by state rules in MD and NJ and also by Allegheny County, PA). We would support moving this date to May 15 but do not support changing it to May 31.

Thank you for reviewing our comments. Please call me if you have any questions or need any clarification.

Yours truly,

A handwritten signature in black ink, appearing to read "Jim Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Cc Gene Barr - PA Petroleum Council
Lou Jung