



2874  
RECEIVED  
IRRC  
2010 NOV 30 P 2:41

Sunoco, Inc.  
10 Industrial Highway G-Building  
Lester, PA 19029

November 29, 2010

Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

Subject: Commercial Fuel Oil Sulfur Limits for Combustion Units

Sunoco, Inc. is pleased to provide comments in reply to the proposed rule making, Environmental Quality Board, changes to 25 PA Code Chapters 121,123,and 139 , Commercial Fuel Oil Sulfur Limits for Combustion Units, as published [40 Pa. B. 5456].

Sunoco Inc. headquartered in Philadelphia PA, is a leading transportation fuel provider in the Northeast and Mid-west marketing areas, with more than 4,800 branded retail locations that market transportation fuels and convenience store merchandise. This retail network is principally supplied by Sunoco-owned refineries with a combined crude oil processing capacity of 675,000 barrels per day. Two of these refineries are located in the Delaware Valley region of Pennsylvania. Sunoco Inc. also has ownership interest in Sunoco Logistics Partners, L.P., a publicly traded master limited partnership which owns and operates 7,600 miles of refined product and crude oil pipelines and approximately 40 active product terminals.

**Sunoco does not take exception to the proposed lower No.2 oil sulfur specification of 15 ppm maximum.** Sunoco has been developing plans for compliance with a similar requirement recently established in New York and a later requirement established for New Jersey.

**Sunoco supports lowering the sulfur requirements for the heavier fuel oil products No.'s 4, 5, 6 oil as proposed.** While Sunoco currently does not manufacture any No.4 or No. 5 fuel oil at our Delaware Valley refineries, the bulk of our No. 6 oil production currently meets or exceeds the proposed 0.5 wt% maximum sulfur standard and could be used as a blend stock by others to satisfy the proposed No. 4 and No.5 oil sulfur standards.

**Sunoco also supports the sell through provisions as proposed in the regulation.** Sunoco would also support extending this provision to terminals that store fuel oil for resale. Otherwise this could have the impact of forcing a much earlier product roll out date to meet the proposed standard and could create supply concerns in the late winter-early spring of 2012.

Sunoco looks forward to continue to supply our many customers in the state of Pennsylvania with quality products that meet or exceed the necessary regulatory requirements.

If there are any questions please contact me at 610-833-3605 or via email at [kdbuchanan@sunocoinc.com](mailto:kdbuchanan@sunocoinc.com).

Sincerely,

Keith D Buchanan  
Manager, Quality Assurance, Fuels Regulatory and Compliance

Cooper, Kathy

---

**From:** BUCHANAN, KEITH D [KDBUCHANAN@sunocoinc.com]  
**Sent:** Monday, November 29, 2010 2:42 PM  
**To:** EP, RegComments  
**Cc:** BUCHANAN, KEITH D; DODDERER, ARNOLD D  
**Subject:** Sunoco Comments on Commercial Fuel Oil Sulfur Limits for Combustion Limits  
**Attachments:** Sun PA ULSHHO Comments 11 29 10.pdf

Sunoco offers the following attached comments on the subject proposed rulemaking and changes to 25 PA Code Chapters 121,123 and 139. If you have any questions please advise.

Keith Buchanan, Sunoco

<<Sun PA ULSHHO Comments 11 29 10.pdf>>

This message and any files transmitted with it is intended solely for the designated recipient and may contain privileged, proprietary or otherwise private information. Unauthorized use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. If you have received it in error, please notify the sender immediately and delete the original and any attachments.

RECEIVED  
IRRC  
2010 NOV 30 P 2:41