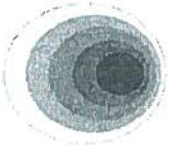


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BUCKEYE PARTNERS, L.P.

2017 APR 20 AM 9:32

April 20, 2017

9999 Hamilton Blvd.
Five TEK Park
Breinigsville, PA 18031

Environmental Quality Board
Rachel Carson State Office Building, 16th Floor
400 Market Street
Harrisburg, PA 17101-2301

Dear Sir or Madam,

Buckeye Partners, L.P. supports the proposed rulemaking that would repeal §§ 126.301–126.303 which impose 7.8 pounds per inch Reid Vapor Pressure (RVP) gasoline in the Pittsburgh-Beaver Valley Area (Allegheny, Armstrong, Beaver, Butler, Fayette, Washington and Westmoreland counties) from May 1 to September 15 of each calendar year. Buckeye Partners, L.P. supports this repeal for the following reasons:

- 7.8 RVP conventional gasoline (with no 1 psi ethanol waiver) currently mandated for this area is the most restrictive conventional gasoline in the Eastern US. Repeal of the low RVP limit would free the Pittsburgh-Beaver Valley Area from the “boutique” summer gasoline island that it has become. While the lower-RVP gasoline is available from either the east or the west, the proposed repeal would allow Pittsburgh to be supplied with less expensive, readily available 9.0 RVP Gasoline that could then easily supply the area, and tank storage traditionally segregated with Pittsburgh summer gasoline in Pennsylvania (PA) and neighboring states (Ohio, Michigan and New Jersey) will be available for 9.0 RVP gasoline service to allow for more efficient supply logistics.
- The recent repeal of the Dayton/Cincinnati low RVP requirement further isolates the Pittsburgh-Beaver Valley area as a boutique fuel island in the summer months.
- There have been similar low RVP repeals recently passed in Florida, Ohio, North Carolina, Alabama, and Tennessee. It would make sense that the population of the Pittsburgh-Beaver Valley Area enjoy the same benefits as those areas.
- The Executive Summary of the Proposed Rulemaking states “Businesses involved in gasoline transport and storage are unlikely to see much impact, if any, as the type of gasoline being transported does not directly affect the business operation”. As a point of clarity, this statement is not true as Buckeye and others must set aside tanks each summer to segregate batches of the boutique 7.8 RVP gasoline for the Pittsburgh-Beaver area, resulting in resupply limitations, constrained assets, and an ongoing need to protect the restrictive 7.8 RVP of the Pittsburgh fuel along the pipeline.
- The benefits of a low RVP fuel in the Pittsburgh market have been reduced since the EPA has implemented further regulation of emissions from Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline facilities (40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants from Gasoline terminals and pipelines). These sources now require more stringent controls, monitoring, recordkeeping and reporting.
- The Pennsylvania DEP’s “Regulatory Analysis Form” completed as part of the proposal estimates that 16.7 million gallons of gasoline were consumed in the Pittsburgh-Beaver Valley Area for the summer months in 2013. Buckeye believes this is grossly underestimated as product transported on our pipeline systems alone averaged almost 19 times this amount of low RVP gasoline into the area annually since 2012.
- This repeal should be expedited, as it has cost consumers, government agencies and businesses in the seven Pennsylvania counties subject to the rule well over \$30 million each summer* and will unnecessarily continue to do so until repealed.

*This estimate is based on average low RVP throughputs delivered into the Pittsburgh area during the summers of 2012-2016 by Buckeye’s pipe line systems only. It does not include gasoline delivered into the area by other pipelines or other transportation sources. This estimate assumes a cost of 9.2 cents per gallon to the consumer as provided in the Regulatory Analysis Form.

Thank you for the opportunity to comment on the proposed rulemaking. Please contact me directly if any follow-up is requested at jmengel@buckeye.com. Sincerely,

Jason Mengel, Manager, Measurement and Quality Control (M&QC)
Buckeye Partners, L.P. (C/o Buckeye Pipe Line Company, L.P., Laurel Pipe Line Company, L.P., and Buckeye Terminals, LLC)