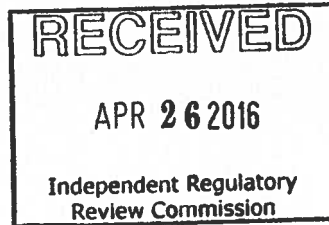


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Sunoco, LLC
3801 West Chester Pike
Ellis Preserve
Newtown Square, PA 19073

May 1, 2017

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

Dear Sir or Madam,

Sunoco, LLC supports the Pennsylvania Environmental Quality Board's proposal to amend Chapter 126 and rescind Subchapter C as it relates to the Reid Vapor Pressure of 7.8 pounds per square inch (psi) or less being sold or transferred in the Pittsburgh – Beaver Valley area between May 1 and September 15 of each calendar year. The state's plan to amend the State Implementation Plan requesting the U.S. Environmental Protection Agency to relax the current Low RVP (7.8 psi) requirements will improve the current supply constraints of summer gasoline to the Pittsburgh – Beaver Valley market area.

Furthermore Sunoco, LLC supports the Pennsylvania Environmental Quality Board's plan to rescind the portion of Chapter 126, Subchapter C as it relates to 40 CFR §80.27 (a)(2) and controls and prohibition on gasoline volatility. As noted in the Environmental Quality Board's Proposed Rulemaking, 40 CFR §80.27 (a)(2) provides for a 1.0 psi RVP allowance for gasoline containing ethanol between 9 and 10 volume percent applicable to the state of Pennsylvania. Once the Low RVP requirement is relaxed from 7.8 psi to 9.0 psi the maximum RVP for state will be 10.0 psi during the May 1 through September 15 time period, exclusive of the Philadelphia region. As indicated above, this would improve supply of gasoline to the Pittsburgh – Beaver Valley market area.

Sunoco, LLC does not support the following statement in the Executive Summary of the Proposed Rulemaking: "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". Logistics companies such as Buckeye Pipeline and Sunoco Logistic must segregate tanks throughout their systems to handle the "boutique Pittsburgh" gasoline on an annual basis. This ultimately creates inefficiencies in distribution of the fuel throughout the supply chain within the state.

The economic impacts associated with the Proposed Rulemaking can be sizable for the driving public in the Pittsburgh – Beaver Valley area. We have estimated the historical differential between the "summer 7.8 psi Pittsburgh gasoline and the 9.0 psi (with 1.0 psi Waiver) gasoline in the surrounding Pennsylvania counties to be approximately \$0.09 per gallon. Given just Sunoco's volume of gasoline delivered to the various bulk terminals in the area, this could be a savings of approximately \$64,000 per day or \$8,900,000 during the May 1 through September 15 time frame.

With the recent U.S. Environmental Protection Agency's approval of the relaxation of the 7.8 psi RVP requirements of the Cincinnati- Dayton area the Pittsburgh – Beaver Valley gasoline is the lone "boutique gasoline" along the east coast of the United States. Similar approvals over the past few years have occurred in Alabama, Florida, Georgia, and North Carolina.



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We would like to thank you for the opportunity to comment on this very important proposed rule change to Chapter 126 of the PA Code.

Best Regards,
Ed

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