



State of New Jersey

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CATHERINE R. McCABE
Commissioner

September 3, 2019

Environmental Quality Board,
Harrisburg, PA 17105
Submitted electronically to RegComments@pa.gov

Re: Revision of the Maximum Allowable Sulfur Content Limit for No. 2 and Lighter Commercial Fuel Oil [25 PA. CODE CH. 123]

To Whom It May Concern,

The New Jersey Department of Environmental Protection (NJDEP) submits this letter in support of the Commonwealth of Pennsylvania's Environmental Quality Board's proposed rule to lower the sulfur content limit in commercial fuel oils used in combustion units in Pennsylvania. This proposed rulemaking will lower the maximum allowable sulfur content limit for #2 and lighter commercial fuel oils to 15 ppm. The adoption of this rulemaking will have numerous air quality benefits as it will reduce sulfate aerosols that contribute to visibility impairment at New Jersey's Class I area, the Brigantine Wilderness Area in the Edwin B. Forsythe National Wildlife Refuge and reduce emissions of fine particulate matter and sulfur dioxide.

Brigantine is one of the 156 mandatory Federal Class I areas for which national visibility goals were established by Section 169A of the 1977 Clean Air Act (CAA). To meet the visibility goals in the CAA, New Jersey, in conjunction with its partners, developed reasonable emission control strategies that would be implemented within and outside the Mid-Atlantic Northeast Visibility Union (MANE-VU) states, as part of its regional haze State Implementation Plan (SIP) submitted in July 2009, for the first regional haze implementation period ending in 2018. New Jersey's regional haze SIP identified Pennsylvania as one of the states that contribute to visibility impairment at Brigantine. A low sulfur fuel oil strategy was identified by New Jersey and other MANE-VU Class I states as a reasonable measure to address visibility impairment in both the first and second planning periods, therefore, New Jersey supports this proposed rulemaking.

Thank you for the opportunity to comment on this important proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Steitz', with a long horizontal line extending to the right.

Francis C. Steitz

Acting Assistant Commissioner

Air Quality, Energy and Sustainability

cc: Krishnan Ramamurthy, PADEP
Kirit Dalal, PADEP
Rick Ruvo, USEPA Region 2
Cristina Fernandez, USEPA Region 3