



August 8th, 2019
PA Department of Environmental Protection
900 Elmerton Ave.
Harrisburg, Pa. 17110

My name is Leonard Zvorsky, Executive Director of the South Central Pennsylvania Energy Association (SCPEA). The SCPEA consist of 31 Oil Heat Dealers and 27 Associate Members. Our footprint includes Franklin, York, Adams, Cumberland, Dauphin, Perry, Lancaster and Lebanon Counties. Our association supports the conversion from 500 parts per million to 15 parts per million fuel for the several reasons below:

The transition from 500 ppm to 15 ppm ultra-low sulfur heating oil (ULSHO) will reduce soot accumulation which will accelerate keeping heating systems cleaner. This will allow cleaner systems resulting in higher efficiency and reduced service calls.

ULSHO is compatible with existing oil heat equipment, so our customers won't need to install new heating equipment to use ULSHO.

The 15 ppm fuel for heating purposes will aid in our transportation logistics. It will enable our members to deliver to multiple locations for off-road diesel and heating oil on the same delivery truck, therefore eliminating several trips to the same regional area.

Converting to 15 ppm heating oil will also eliminate additional storage tanks at bulk plants and loading terminals thus adding capacity for storage.

Finally, the SCPEA feels converting Pennsylvania to 15 ppm is a winning formula from an environmental and logistical standpoint.

Respectively Submitted,

A handwritten signature in black ink, appearing to read "Leonard Zvorsky", is written over the typed name.

Leonard Zvorsky, scpea4@gmail.com

Executive Director

South Central Pennsylvania Energy Association

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