



**STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



Public Hearing -- March 12, 2010  
Environment Committee

Testimony Submitted by Commissioner Amey W. Marrella  
Department of Environment Protection

**Raised Senate Bill No. 382 - AN ACT REQUIRING BIODIESEL BLENDED HEATING OIL AND LOWERING THE SULFUR CONTENT OF HEATING OIL SOLD IN THE STATE**

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Thank you for the opportunity to present testimony regarding Raised Senate Bill No. 382 - AN ACT REQUIRING BIODIESEL BLENDED HEATING OIL AND LOWERING THE SULFUR CONTENT OF HEATING OIL SOLD IN THE STATE.

The Department of Environmental Protection (Department) does not support Raised Senate Bill No. 382 in its current form. The Department supports lowering the sulfur content of distillate fuels. Reducing fossil fuel consumption and the air emissions associated with burning distillate fuel is a worthy and cost effective multi-pollutant reduction strategy that will assist the State in meeting its clean air objectives--attaining the federal health based air quality standards for both ozone (i.e., smog) and fine particulate matter (PM<sub>2.5</sub>).

The entire State fails to meet federal ozone standards, obligating the State to develop more strategies to reduce ozone precursor emissions. In addition, New Haven and Fairfield Counties are designated as not attaining the federal PM<sub>2.5</sub> standard. Emissions from combustion of distillate fuels, such as heating oil, result in air pollution in the form of nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), and sulfur dioxide (SO<sub>2</sub>). SO<sub>2</sub> emissions create sulfates, which are the primary component of PM<sub>2.5</sub> in Connecticut and the most significant contributor to acid deposition and visibility impairment in the State. On an annual basis, the combustion of distillate oil is responsible for 36 percent of total SO<sub>2</sub> emitted in the state. In the heating season, distillate oil combustion contributes almost one-half (49 percent) of Connecticut's total SO<sub>2</sub> emissions. All of these pollutants endanger public health by contributing to ozone, PM and regional haze. They can also cause inflammation of the airways and exacerbate asthma in children and adults and exacerbate other cardio-pulmonary diseases, such as chronic obstructive pulmonary disease (COPD).

The Department favors adoption of a bill that reduces the sulfur content of heating oil from the established maximum of 3,000 ppm to 15 ppm as soon as practical and by no later than the 2016-18 timeframe. Such a bill would protect public health and our regional air shed and meet federally enforceable commitments to reduce Connecticut's contribution towards regional haze, while simultaneously protecting Connecticut's consumers from the damaging effects of high sulfur heating oil.<sup>1</sup> This approach is necessary and consistent with our obligation to address Regional Haze pursuant to the federal Clean Air Act and represents a significant PM2.5 compliance strategy.

As currently drafted, the bill does not contain enough specificity for the Department to analyze the environmental implications of a biodiesel mandate beginning in 2011 and the Department has not conducted any analysis the potential impact to the price of fuel of should such a mandate be enacted.

Finally, the Department would like to work with the Committee to improve the drafting of this bill because clarity is needed on what specific fuel is being regulated. Additionally, the sulfur content limit for off-road diesel fuel should be deleted in its entirety because that standard is now set by the federal government at 15ppm sulfur.

Thank you for the opportunity to present testimony on this proposal. If you should require any additional information, please contact Robert LaFrance at 424-3401 or [Robert.LaFrance@CT.gov](mailto:Robert.LaFrance@CT.gov).

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<sup>1</sup>The 2006 Clean Diesel Plan includes an analysis of the potential emission reductions from reducing the sulfur content of distillate oil to 15ppm. The plan contains an estimated reduction of SO2 emissions by over 10,000 tons per year. See Connecticut Clean Diesel Plan 2006 at <http://www.ct.gov/dep/lib/dep/air/diesel/docs/ctcleandieselplanfinal.pdf>