



The State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

March 24, 2015

The Honorable Robert Introne, Chair  
House Science, Technology and Energy Committee  
Legislative Office Building, Room 304  
Concord, NH 03301

**RE: SB 208, “An Act establishing a committee to study limiting the sulfur content of liquid fuels”**

Dear Chair Introne and Members of the Committee:

Thank you for the opportunity to testify on SB 208. This bill would establish a committee to study limiting the sulfur content of liquid fuels. DES supports this bill and will provide necessary technical support for the committee upon passage.

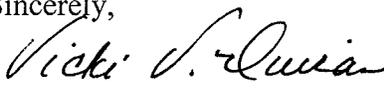
Air pollution, including particulates (soot) and related gases (nitrogen dioxide and sulfur dioxide) can scatter and absorb light, limiting the distance that one can see and obscuring color and clarity. Visibility can often be reduced over large regions, and is therefore called Regional Haze. Sulfur in heating oils directly contributes to the formation of sulfur dioxide (SO<sub>2</sub>) and the indirect formation of aerosols and particulate matter when combusted in heating equipment. Low sulfur fuel oil has been identified by the member states of the Mid-Atlantic Northeast – Visibility Union (MANE-VU), which coordinates regional haze planning activities for the region and consists of eleven Northeast states and the District of Columbia) as being a cost effective and reasonable emission control measure for reducing haze causing pollution in designated Class I Wilderness areas including the Great Gulf and Presidential Range - Dry River areas in New Hampshire.

EPA’s Regional Haze rule requires states, working in conjunction with Forest and Park Service land managers, to submit state implementation plans (SIPs) with emission reduction commitments every ten years to provide progress towards steady visibility improvement. Sulfur emissions are the primary source of haze causing particles in the Northeast and as a result became the primary focus for state regional haze SIPs. When the New Hampshire plan was submitted in January of 2011, it was the only state that did not include a low sulfur fuel oil measure. At the request of EPA and the federal land managers, the New Hampshire SIP did include a commitment to study and pursue the measure. Fuel oil combustion has become the single largest source of sulfur emissions in New Hampshire.

Low sulfur fuel oils not only lower haze causing emissions, they also lower emissions of other pollutants including sulfur dioxide and fine particles throughout the state. Less sulfur in fuel also means less fouling of pollution control catalysts which can lower maintenance costs and lower emissions of nitrogen oxides and carbon monoxide. Additionally low sulfur home heating oil can reduce the need for routine cleanings and other additional maintenance of home heating systems, thereby reducing consumer costs.

Thank you for your consideration in this matter. If you have questions or need additional information, please contact Michael Fitzgerald, Asst. Director of the Air Resources Division ([michael.fitzgerald@des.nh.gov](mailto:michael.fitzgerald@des.nh.gov), 271-6390) or Craig Wright, Director of the Air Resources Division ([craig.wright@des.nh.gov](mailto:craig.wright@des.nh.gov), 271-1088).

Sincerely,

  
 Thomas S. Burack  
Commissioner

cc: Sponsors of SB 208