

Comparison of Positions to Reduce Sulfur in Fuel States/Locals vs. Petroleum Industry

Issue	STAPPA/ALAPCO	API/NPRA
Area Covered	National	Regional
Sulfur Limit	80-ppm Cap; Approximately 40-ppm Avg.	150-ppm Avg./22 Eastern States; 300-ppm Avg.Elsewhere
Time Frame	2003	2004
Seasons Covered	Year Round	Summer Only
Benefits: Tier 1 Vehicles Removed Today¹	53,700,000	1/5 Benefits of STAPPA/ALAPCO
Substantial Reductions in Nonattainment Areas	Yes	No
Substantial Reductions in Attainment Areas	Yes	No
Costs	1-5 cents/gallon	Up to 2 cents/gallon
Cost-Effectiveness	More	Less
Protects Catalysts	Yes	No
Full NLEV Benefits	Yes	No
Compatible With Advanced Technologies	Yes	No
Consistent I/M Results	Yes	No

¹STAPPA/ALAPCO's calculation is based upon API/NPRA's methodology, except STAPPA/ALAPCO (unlike API/NPRA) does not take credit for emissions reductions that will result anyway from Phase 2 Federal Reformulated Gasoline. If the API/NPRA estimate of 15,900,000 is revised to remove credit taken for RFG, the industry proposal would result in 11,700,000 vehicles removed, or 1/5 the benefits of STAPPA/ALAPCO.