



USW Local 10-234
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Refinery Workers Local 234 Chartered 1933

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union

February 19, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Comments on Proposed Denial of Petitions for Rulemaking to Change the RFS Point of Obligation, 81 Fed. Reg. 83,776 (Nov. 22, 2016), EPA-HQ-OAR-2016-0544

Dear Administrator Pruitt:

As the President of the USW Local 10-234 representing over 200 union brothers and sisters at Monroe Energy's refinery in Trainer, Pennsylvania, I write today urging you to grant Monroe Energy's Petition for Rulemaking to change the point of obligation under the Renewable Fuels Standard (RFS). Monroe and other merchant refiners in the Philadelphia region are under immense financial pressure because of the imbalanced nature of the RFS program. Reform is needed now, before it's too late for our refineries.

The current structure of the RFS places the point of obligation on petroleum refiners like Monroe Energy, who have no direct control over the amount of renewable fuel that is blended into the gasoline sold into the marketplace. Although the agency intended this compliance system to be the primary driver towards renewable fuels, the reality is that separating the point of obligation from the point of compliance has resulted in a deluge of third party speculators, excessive fraud in the RIN market with little or no transparency, and dramatic increases in RIN prices – with little growth in renewable fuels.

Our members' jobs, their families and our region rely on the economic vitality of our refineries. As you may recall, the Pennsylvania Department of Labor conducted a study in 2011 which found that every single refinery job supports 18.3 more jobs in our local community, 22 in Pennsylvania, and over 60 jobs nationwide.

Without a change, our jobs are at risk, our national security is threatened, and the goals of RFS the program will not be met.

Thank you for considering our views.

Sincerely,

Jonas Dauber
President, United Steel Workers Local Union 10-234