



Leo W. Gerard  
International President

July 6, 2017

**VIA EMAIL**

United States Senate  
Washington, D.C. 20510

**RE: United Steelworkers (USW) opposition to S.517 - Consumer and Fuel  
Retailer Choice Act**

Dear Senator:

On behalf of the 850,000 members of the United Steelworkers (USW), I wish to express our deep concern and opposition to S. 517 the Consumer and Fuel Retailer Choice Act as currently drafted. Since the 1970's our union has long been an advocate and partner in ensuring the Clean Air Act finds the correct balance between jobs and a clean environment. This legislation does neither while potentially impacting safe, well-paid union jobs.

S. 517 will change the allowed "Reid Vapor Pressure (RVP)", a common measure of the volatility of gasoline, to authorize the usage of additional ethanol in the nation's transportation fuels supply. The change in law would permit the usage of ethanol blends of up to 15 percent, commonly known as "E15". Waiving clean air regulations to allow increased sales of E15 blends runs counter to the intent of the Clean Air Act and the environmental policy goals of the Renewable Fuels Standard of producing "clean renewable fuels".

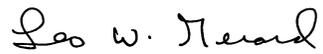
Increased usage of ethanol in gasoline will lead to increases in ground-level smog pollution. Ozone and NOx are significant urban pollutants which can cause severe respiratory problems. The increased pollution and detrimental impacts have the potential of forcing additional Clean Air Act actions with State Implementation Plans (SIPs). USW is seriously concerned that states, in an attempt to meet federal air quality standards because of additional E15 pollutants, will place additional regulatory burdens on stationary sources such as manufacturing or refining facilities.

USW believes a larger discussion on the Renewable Fuels Standard (RFS) must come before such a significant change in Clean Air Act policy happens. The rapid growth of ethanol production has lowered reliance on foreign oil but the policy is now over ten years old and requires maintenance by Congress. Issues such as moving the point of obligation to where blending actually occurs and safety issues in ethanol production must be addressed. The Bureau of Labor Statistics (BLS) indicates that

ethanol production has a total recordable incidence rate of nonfatal occupational injuries and illnesses that is four times greater than the petroleum refining industry.<sup>1</sup> This is unacceptable and Congress must act to ensure the safety of workers in this industry.

Workers, consumers, companies, and the environment will all be negatively impacted by S. 517 if it becomes law. Issues such as the unintended impacts on manufacturers and energy producers in Clean Air Act policy, larger RFS policy reforms such as moving the point of obligation, and health and safety concerns in the ethanol production industry must be addressed and is why our union strongly urges you to oppose S. 517.

Sincerely,



Leo W. Gerard  
International President

LWG/cdk

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<sup>1</sup> [https://www.bls.gov/news.release/archives/osh\\_10272016.pdf](https://www.bls.gov/news.release/archives/osh_10272016.pdf)