



EAST COAST CALLS FOR RFS REFORM

Elected officials, organized labor leaders, small businesses, and industry groups throughout Delaware, Pennsylvania and New Jersey are urging the Biden administration to fix the Renewable Fuel Standard (RFS).

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ELECTED OFFICIALS

Governor Phil Murphy (D-NJ): "I write to respectfully urge you to extend flexibilities to merchant refiners through the renewable volume obligation under the Renewable Fuel Standard (RFS)." *Letter to EPA, June 2021.*

Representative Donald Norcross (D-NJ-1): "We're going to try to work with Republicans in a bipartisan way to find solutions to what really is not working... Nobody is even suggesting that the blending of ethanol is not going to be part of this moving forward, but we created a commodity. Trading of these RINS is completely out of the picture of what we're trying to do... We have to do this for our country and for the men and women who count on this for employment." *"The Labor Show with J Doc and Krausey," May 28, 2021.*

Pennsylvania Gov. Tom Wolf (D-Pa.): "I have been attempting to draw attention to this issue since 2017, when I first filed a petition for waiver 'based upon the high cost of compliance with the [RFS] and the impacts these costs have on the continued viability of the oil refining sector in the Northeast, as well as on the local and regional economies.'" ... Since my previous petitions were filed, conditions have continued to deteriorate." *Letter to EPA, February 2021.*

Senator Pat Toomey (R-Pa.): "Since 2009, eight refineries have shuttered on the East Coast alone, including the region's largest refinery, Philadelphia Energy Solutions, which closed its doors in 2019. This rash of closures has taken a financial toll on state and local budgets, however, the most devastating consequences has been the thousands of blue collar jobs that have been lost in the process." *Letter to EPA with 12 U.S. Senators, March 2021.*

Senator Bob Casey (D-Pa.): "Of particular concern is the implementation of the RFS compliance trading system used by EPA, the Renewable Identification Number (RIN) market, which has fluctuated wildly as a result of various market forces....Allowing RIN prices to spike to these levels makes it extraordinarily challenging for refiners to engage in midterm economic planning and budgeting—let alone to attract capital to undertake long-term major investments that create new, high-quality jobs." *Letter to EPA, May 2021.*

State Senator Jake Corman, President Pro Tempore (R-Pa.-34): "Simply put, if the proposed RFS blending requirements are adopted in their current form, there is a high likelihood that the few remaining refineries in the northeast will be forced to close their doors forever." *Letter to EPA, February 3, 2022.*

Representative Scott Perry (R-Pa.-10): "Removing the inflationary impacts of the RFS mandate is another significant deregulatory action that will offer the American people significant economic relief. I urge you to use your existing authority under Section 211(o)(7) of the Clean Air Act to waive this mandate indefinitely, to ensure that no misguided government mandates interfere with the imminent economic recovery." *Letter to EPA, April 2020.*

State Representative Joanna McClinton (D-Pa.-191): "At a time when energy prices continue to rise, I am concerned that many residents are simply not in a position to absorb additional home energy costs should these facilities close, especially in light of the new realities of this COVID-19 economy." *Letter to EPA, February 3, 2022.*

New Jersey Congressional Delegation, led by Rep. Donald Norcross (D-NJ-1): "We ask that you take swift action to fix the RFS system and provide appropriate relief to domestic refiners experiencing economic hardship due to inflated RINS, especially as the industry continues to deal with downturns from COVID-19. Specifically, we urge you to take action that results in lower, more stable, and predictable RINS prices that allow independent refiners to maintain operations." *Letter to EPA, October 2021.*



Pennsylvania Congressional Members, led by Rep. Brian Fitzpatrick (R-Pa.): "In a bitter twist of irony, the RFS is pushing America back into dependence on foreign oil and foreign fuel imports – the exact situation it was intended to help our nation escape. As other countries continue to build out their refining infrastructure with the ultimate goal of supplying countries like the United States with fuel, the RFS is causing the loss of America's own refining capacity – along with the loss of tens of thousands of good-paying American jobs." *Letter to President Biden, September 2021.*

Governor John Carney (D-Del.) and the Delaware Congressional Delegation: "Uncertainty in the RFS program, coupled with lower biofuel production, lower fuel demand, and higher commodity prices due to the COVID-19 pandemic has led to an extremely volatile RIN market. Today, the market prices for a biodiesel RIN or a corn ethanol RIN are surpassing all-time highs. At the beginning of 2020, the corn ethanol RIN was 15.8 cents, and not it is \$1.30 and climbing. This price volatility creates great difficulties for independent merchant refiners, like the one located in Delaware City, Delaware, to plan and comply with the RFS, especially while grappling with the market effects of COVID-19." *Letter to EPA, March 2021.*

Pennsylvania Congressional Members, led by Rep. Mary Gay Scanlon (D-Pa.): "For independent refineries that are required to purchase RINs, RFS compliance costs now run into hundreds of millions of dollars a year, exceeding all other operational costs. To put this into further context, at current RIN prices, this year the Monroe Energy facility will spend twice as much to comply with the RFS program as it spent to purchase the entire company only ten years ago. This volatility within the current system is why proposals to reform the RFS have received bipartisan support in Congress," *Letter to President Biden with Democrats in Pennsylvania's Congressional delegation, September 2021.*

Pennsylvania State Representatives led by State Rep. Kerry Benninghoff, Majority Leader (R-Pa.-171) : "As we stated in HR 148, EPA must also act quickly to implement long-term permanent reforms which provide cost containment and stability for refiners, while allowing for blending of renewable fuels as originally envisioned by Congress. The most appropriate way to do this is by shifting the point of obligation away from refiners and onto blenders, as the blenders are the parties who are largely responsible for controlling blending in the first place." *Public comment.*

New Jersey State Senate and General Assembly: "Over the past year, United States refiners have been devastated by spiking, volatile Renewable Identification Number (RIN) prices under the federal Renewable Fuel Standard (RFS) program and a dramatic reduction in the use of fuel that was triggered by the COVID-19 pandemic. These factors have resulted in a shortage of RINs, and eight refinery closures, throughout the nation." *New Jersey General Assembly resolution, passed unanimously on June 24, 2021 then unanimously by the State Senate on June 30.*

New Jersey Legislative District 1: "While the RFS was well-intentioned, it has since gotten significantly off-track. However, if you take action now, you can protect union jobs, strengthen our energy and national security and preserve the facilities that are vital to our national effort to transition to a greener fuel future." *Letter to EPA, September 2021.*


New Jersey Legislative District 2: "We must do all we can to take fair steps to protect our domestic refineries, the thousands of union jobs they create, and our energy independence from foreign countries. It is absolutely imperative that the Biden administration, with your support, implements common-sense reforms to the well-known problems we have laid out here of the RFS program." *Letter to EPA on March 9, 2022.*

New Jersey Legislative District 3: "Our district is home to one of only four large refineries left on the East Coast; one of two in the state of New Jersey. This facility is an economic wellspring in our district and beyond. Both direct jobs, as well as countless indirect jobs including those held by union workers, are tied to this facility." *Letter to EPA on May 2, 2022.*

New Jersey Legislative District 8: "Our region's independent refiners are critical to our energy and national security, as they provide much-needed diversity for our national fuel production capabilities. Just 14 years ago, there were a dozen regional refineries and today, just four remain." *Letter to EPA on February 9, 2022.*

New Jersey Legislative District 9: "It is absolutely imperative that the Biden administration, with your support, implement common-sense reforms to the well-known problems of the RFS program. We have the opportunity to take appropriate, and fair steps to protect our domestic refineries and our energy independence while still supporting farmers and biofuels producers." *Letter to EPA, November 2021.*

New Jersey Legislative District 11: "Our district is home to numerous popular destination towns such as Asbury Park, Long Branch, and more, all of which depend upon tourists willing to drive to these locations. Additionally, our county is a commercial hub for New Jersey. High fuel costs caused by a broken RFS, or in the worst case, caused by regional refinery closures, would have devastating effects on our communities, our residents, and the businesses that sustain us." *Letter to EPA on April 5, 2022.*



New Jersey Legislative District 13: "RFS simply isn't working as intended, and it's putting those refineries in jeopardy due to skyrocketing costs to meet the RFS mandate. Just 14 years ago, there were a dozen of these refineries. Today, they number just four." *Letter to EPA on January 10, 2022.*

New Jersey Legislative District 30: "Our district is one of the fastest growing in New Jersey and families have been impacted by rising inflation, including the cost of fuel. High fuel costs caused by a broken RFS, or in the worst case, caused by regional refinery closures would have devastating effects on our communities, our residents, and the businesses that sustain us." *Letter to Biden Chief of Staff Ron Klain on June 1, 2022.*

Pennsylvania Congressional Members, led by Rep. John Joyce (R-Pa.): "As evidenced by the recent bankruptcy and closure of the PES refinery in Pennsylvania, current RFS volume obligations and associated RIN costs pose a serious threat to the economic vitality and viability of merchant refiners in our region and across the nation. There are workers, families, and communities that are counting on the economic success of these refineries." *Letter to EPA, February 2021.*

State Senator Troy Singleton (D-NJ): "Our region's independent refiners create and support tens of thousands of good-paying, family-sustaining jobs in the tri-state region, including many union jobs. While the RFS was a well-intended program, it isn't working as Congress envisioned and, as a result, our region's last few independent refiners are suffering severe economic harm." *Letter to EPA, December 2021.*

State Senator James Beach (D-NJ): "While the RFS was a well-intended program, it isn't working as Congress envisioned and as a result, our region's last remaining independent refiners are suffering severe economic harm." *Letter to EPA, November 2021.*

State Senator Fred Madden (D-NJ): "We applaud the efforts of this administration to ensure America takes a leading role in the world on green energy, but we must take fair steps to protect our domestic refineries, the thousands of union jobs they create, and our energy independence from foreign countries." *Letter to EPA, November 2021.*

Mayor David R. Mayer, Gloucester Township, NJ: "One of only four large refineries left on the East Coast is located nearby in Paulsboro, which is one of two in the Garden State. The facility located nearby contributes to our regional economy and includes both direct and indirect jobs, including those held by union workers." *Letter to EPA on May 25, 2022.*

Cumberland County, NJ, Board of Commissioners: "Simply put, the RFS is broken. Due to the way the current RFS program is structured, the last remaining regional refiners are facing dire financial circumstances." *Letter to EPA, October 2021.*

Cape May County, NJ, Board of Commissioners: "This resolution urges the President of the United States of America and the United States Environmental Protection Agency to take appropriate action to issue waivers and implement other reforms to allow for the blending of renewable fuels under the federal "Clean Air Act," while containing costs for independent refiners." *Resolution adopted on January 25, 2022.*

Board of Monmouth County, NJ, Commissioners: "Many independent refiners already struggle with slim margins and the RFS program's RIN requirements, as well as the manner in which the unregulated RIN market operates without oversight and subject to speculation and fraud, all of which are currently inflicting serious economic harm on those businesses." *Resolution adopted in December 2021.*

Gloucester County, NJ, Board of Commissioners: "In the last year, spiking, volatile Renewable Identification Number ("RIN") prices and the dramatic reduction in the use of fuel triggered by the COVID-19 pandemic has been well below RFS estimates, devastating United States refiners, which has led to a shortage of RINs and eight refinery closures across the country." *Resolution, September 2021.*

Pennsylvania State Senate: "[T]he Senate urge(s) the Biden Administration and the Environmental Protection Agency to set 2021 and 2022 volumes and reform and restructure the RFS program going forward so as to maintain low and stable RINs prices while allowing for blending of renewable fuels consistent with the original intention of the program." *Senate Resolution 139, adopted by a 47-3 vote on June 25, 2021.*

Delaware County, PA, Council: "While the RFS was well-intentioned, it has since gotten significantly off-track. However, if we take action now, we can protect union jobs and strengthen our energy and national security." *Letter to President Biden, October 2021.*

Pennsylvania State House of Representatives, Delaware County Democratic Delegation: "The current structure of the RFS program is unsustainable for independent refineries like Monroe Energy and without reforms, it places thousands of our constituents at risk of losing their family sustaining union jobs." *Letter to President Biden, October 2021.*

Councilman John Lombardo, Luzerne County, PA: "If we lose our regional refiners because of the RFS, countless families will certainly see price spikes and product shortages, and those outcomes could be even worse in an emergency scenario like a price spike or natural disaster." *Letter to EPA, January 31, 2022.*

Lower Allen Township, PA, Board of Commissioners: "Both houses of each of the legislatures of Pennsylvania and New Jersey overwhelmingly passed resolutions calling for reforms to this broken program, and the Governors of PA, NJ, and DE have also written in support of RFS reform. Our last remaining refineries on the east coast are depending on your agency to make common-sense changes to a program that has had serious, lingering problems over the past three Administrations." *Letter to EPA, January 31, 2022.*

ORGANIZED LABOR

International Brotherhood of Electrical Workers Local 654: "Many of our members depend on facilities like Monroe Energy for their livelihoods, and for decades, jobs at our local refineries have provided life-changing opportunities for thousands of Local 654 members." *Letter to EPA, August 2021.*

Laborers' International Union of North America Local 413: "The domestic refining industry provides our members with hundreds of high-paying jobs, which in turn allows our union to invest in training, and reinvest in our communities through our charitable and volunteer efforts. When refineries invest in new capital or major maintenance projects, they typically employ an additional 1,000 or more skilled craft workers. But the pandemic has created tremendous challenges for our members, as projects across our region were either put on hold or cancelled altogether. Couple this with wildly volatile and often excessive RIN prices, and many of these facility investments are uncertain." *Letter to EPA, August 2021.*

International Union of Painters and Allied Trades District Council 21: "Local refineries are key partners for our union and regularly provide high-quality work opportunities for our members. Unless significant steps are taken soon, independent refineries in our region and more throughout the country could close their doors forever, creating an economic crisis that will devastate working families and compromise our national fuel security for years to come." *Letter to EPA, August 2021.*

United Brotherhood of Carpenters and Joiners of America: "I write today urging immediate action to prevent RIN prices from becoming the straw that breaks the back of independent American refiners in crisis." *Letter to President Biden, July 2021.*

North America's Building Trades Unions: "If RIN costs do not subside substantially soon, there is the very real possibility that another million barrels per day of refining capacity will be permanently closed. This is concerning at any time, but it's even more so now as we continue to claw our way back from the depths of the pandemic." *Letter to President Biden, June 2021.*

United Steelworkers: "The USW supports complete RFS reform and RIN market regulation. This 15-year-old policy needs reform that relies on available data, considers environmental impact, and puts working people first. Oil will continue to be a fuel important to our economy in the future. Our union wants to prevent bad policy, like the unregulated RIN market, from being a major contributor to the loss of union jobs and the import of product." *Comments to EPA, February 2021.*

The International Brotherhood of Boilermakers: "The domestic refining industry provides our members with thousands of high-paying jobs.... However, wildly volatile often excessive RIN prices have curtailed some of these substantial investments, and they have even contributed to at least one refinery bankruptcy in the recent past." *Letter to EPA, April 2021.*

Philadelphia, Delaware, and New Jersey Building Trades: "There is a pressing need for [EPA] to act swiftly on petitions that several governors submitted to partially waive the federal Renewable Fuel Standard (RFS) volume mandate in order to prevent severe economic harm throughout the nation, and in the Northeast and Mid-Atlantic regions in particular." *Letter to EPA, May 2021.*

Mechanical & Service Contractors Association: "As refiners struggle to stay afloat among slumping demand, massive financial losses because of the pandemic, RIN prices skyrocketed, climbing from under ten cents at one point last year to over one dollar and thirty recently, a greater than 1500% increase." *Letter to EPA, April 2021.*

Delaware County AFL-CIO Council: "[W]e must protect these facilities, and the family supporting union jobs they provide, as they are major economic drivers in the northeast... unless something is done soon, this unsustainable trajectory will lead to even more refinery closures." *Letter to EPA, February 2021.*



Philadelphia Building and Construction Trades Council: "If action is not taken soon on Governor Tom Wolf's petition and meaningful reforms to the RFS are not achieved, we fear that the remaining refineries in our region will be gone forever. The economic impact of such an outcome is unthinkable." *Letter to EPA, February 2021.*

Steamfitters Local Union 420: "Without a change, our jobs are at risk, our national security is threatened, and the goals of the [RFS] will not be met." *Letter to EPA, February 2021.*

USW Local 10-234: "Our members' jobs, their families and our region rely on the economic vitality of the refinery. The severe economic harm that was the basis for the Governor's petition is even more severe today." *Letter to EPA, February 2021.*

Iron Workers Local Union 451: "Our request comes at a time when immediate action is necessary to prevent RIN prices from becoming the straw that breaks the back of independent American refiners in crisis. We urge you to work towards setting reasonable RFS standards moving forward to protection the union jobs and American families that President Biden has continuously fought for throughout his career." *Letter to EPA, September 2021.*

Plumbers and Pipefitters Local Union 322: "If PBF refinery closes its operation, not only will it result in the loss of so many good paying jobs, it will result in the loss of millions of dollars throughout the local economy and region—negatively impacting many small businesses and hard-working families." *Letter to EPA on February 4, 2022.*

Delaware AFL-CIO and Building & Construction Trades: "Rather than actually increasing consumption of domestic biofuel and creating union jobs in alternative energy, the RFS has become a tool for doing the exact opposite. This scheme is forcing American refiners that support union labor to subsidize the world's largest oil companies that are currently working against worker's interests. It also subsidizes existing ethanol plans that shun union labor and fight efforts to increase their represented workforce" *Op-ed in the Delaware News Journal, July 2021.*

SMALL BUSINESSES, ASSOCIATIONS, AND INDUSTRY GROUPS

Mechanical & Service Contractors Association: "As refiners struggle to stay afloat among slumping demand and massive financial losses because of the pandemic, RIN prices skyrocketed, climbing from under ten cents at one point last year to over one dollar and thirty recently, a greater than 1500% increase." *Letter to EPA, April 2021.*

Vane Brothers Company: "Monroe Energy and PBF have spent billions on RFS compliance costs in the past decade alone. This is an unsustainable cost that represents an existential threat to the continued existence of these facilities." *Letter to EPA, May 2021.*

Harrisburg Regional Chamber and CREDC: "On behalf of our 900 members and their more than 130,000 employees, the Harrisburg Regional Chamber and Capital Region Economic Development Corporation (CREDC) strongly supports critical reforms to the federal Renewable Fuel Standard (RFS)...Otherwise, the livelihoods of countless Americans in our region, as well as our security of fuel supply, are in jeopardy. Let's find a reasonable solution – one which can be achieved that both promotes the continued use of biofuels in this country and protect America's valuable, independent refineries." *Letter to EPA, September 2021.*

Pennsylvania Manufacturers' Association: "Pennsylvania's manufacturers are concerned, and the EPA should be, too...Manufacturers depend on affordable and reliable energy supply to meet the needs of our vast and complex supply chains and networks. No matter what is being made, manufacturers need energy and energy-based liquids to meet customer demands. At a time when we have realized how fragile our supply chains and distribution networks are because of the COVID-19 pandemic, cyber-terrorism pipeline disruptions, or natural disasters, it should be the priority of the EPA to ensure that our manufacturers, here at home, can ensure full operation." *Letter to EPA, August 2021.*

Pennsylvania Chamber of Business and Industry: "[T]he administration should use the tools at its disposal to provide relief. I urge you to grant the petition or, at a minimum, put in place cost containment measures to control and significantly reduce the cost of RINs." *Letter to EPA, February 2021.*



Pennsylvania Chemistry Industry Council: "Pennsylvania's chemical industry represents \$24 billion in economic activity and more than 80,000 jobs. Our member companies manufacture chemicals and products that rely on numerous raw material providers and our region's refineries serve as some of their most indispensable partners in this respect...We ask that you work with stakeholders to develop solutions, such as allowing refiners to purchase fixed waiver credits for the ethanol requirement, so these companies may continue to fuel the business of chemistry." *Letter to EPA, August 2021.*

Pittsburgh Airport Area Chamber of Commerce: "If government fails to do something about the skyrocketing cost of tradable credits that independent refiners need to buy to show RFS compliance, called Renewable Identification Numbers or RINs, refiners supplying needed transportation fuels – including the majority of the fuel to the Pittsburgh Airport – could close. Such a situation could make airlines' recent fuel supply warnings a permanent reality, threatening the economic viability of the entire region." *Letter to EPA, August 2021.*

The Chamber of Commerce of Greater Philadelphia: "With the volatility of RIN prices, refineries must spend billions to comply with the mandate, undermining the economic viability of many smaller refineries. For many years, the Monroe Energy Trainer Refinery's annual RFS compliance costs exceeded what the company paid for its entire facility. Now, climbing RIN prices and depressed fuel demand have made conditions more desperate for small independent refiners like Monroe." *Letter to EPA, June 2021.*

The Port of Philadelphia: "For some time, refiners in our region have been under tremendous financial pressure from the RFS. The current structure of the RFS places the obligation to blend renewable fuels like ethanol on merchant refiners who have little or no control over the amount of renewable fuel that gets blended into the transportation fuels that they produce. These refiners are therefore left with only one option to comply with the RFS: purchase expensive compliance credits known as Renewable Identification Numbers (RINs) regardless of the price." *Letter to EPA, June 2021.*

Greater Reading Chamber Alliance: "Our members depend on having reliable access to fuel supplies in order to operate and grow their businesses, and they have this thanks to regional diversity of fuel supply. The current structure of the RFS in conjunction with rampant inflation, threatens to undo these geographical benefits, leading to a cascading effect of fuel shortages and even higher price increases." *Letter to EPA, November 2021.*

Chester County Chamber of Commerce: "As it stands today, the RFS is not operating in a manner that is consistent with Congress's intent, and this is resulting in severe economic harm impacting independent refiners and their local economies across the country including the last remaining refineries in the Northeast." *Letter to EPA, August 2021.*


Pocono Chamber of Commerce: "The RFS must be reformed now, or we risk making our nation even more dependent on foreign energy sources which is exactly what the RFS was trying to prevent in the first place. While the RFS was well-intentioned, it has since gotten badly off-track." *Letter to EPA, November 2021.*

Greater Pittsburgh Chamber of Commerce: "For many years, the RFS has not functioned in accordance with its original intent, and the recent spike in Renewable Identification Numbers (RINs) credit costs has created a dire scenario for the independent refineries that supply the Northeast. Unless significant action is taken soon, these refineries could close forever, jeopardizing tens of thousands of jobs throughout Pennsylvania, diminishing our national fuel supply security, and leading to fuel shortages and price spikes." *Letter to EPA, October 2021.*

BrandSafway Industries, LLC: "The economic well-being of many businesses in Pennsylvania, New Jersey, and Delaware (and indeed, nationwide) are tied to our refineries, as are the livelihoods of thousands of people employed by businesses like ours. We are counting on EPA to right the ship and make critical reforms to the RFS, beginning with the aforementioned changes to the RVO, before time runs out." *Letter to EPA, January 28, 2022.*

Sauder's Eggs: "While you may initially be wondering why a company in the business of egg distribution would be submitting official comments to the EPA on matters related to biofuel blending, the answer is simple: The RFS program is malfunctioning, and unless significant changes are made, our domestic fuel refiners could go out of business." *Public comment, February 3, 2022.*

Scientific Equipment Company: "We quickly learned from the demise of PES that this is a critical issue for our region, and without a change to the program's current structure, the goals of the program will not be met and our national and energy security along with tens of thousands of good paying jobs will be at risk." *Letter to Congresswoman Mary Gay Scanlon, August 2021.*



Delaware County Chamber of Commerce: "The refinery collectively provides millions of dollars of direct tax benefits to local communities, school districts, the County and the Commonwealth ... The current state of the RFS threatens all of these crucial benefits that Monroe and other independent refineries provide to their respective communities." *Letter to EPA, June 2021.*

Delaware Black Chamber of Commerce: "The Delaware City Refinery is a key driver of the region's economy, providing one of the largest source of union jobs in the state, directly employing over 500 people, with 300 Building Trades members working on site for contractors. The refinery also brings in as many as 1,000 additional Building Trades contractors for major maintenance projects.. Unfortunately, the unintended consequences of how the federal Renewable Fuel Standard (RFS) is administered is putting this critical business at risk," *Letter to EPA, September 2021.*

The Chemical Industry Council of Delaware: "The expansion and construction of export refineries in China, India, and the Middle East continues today and these countries will happily displace U.S. refineries and our jobs, certainly a national security concern. We should make it a priority to have those products refined, cleanly and safely in this country – not abroad. The Delaware City, Delaware refinery is one of the last three large refineries that remain in fuel production on the East Coast. It employs over one thousand hardworking Delawareans. Given these realities, it is imperative to act now to ensure domestic fuel supplies and union jobs are not put at continued risk." *Letter to EPA, September 2021.*

Maritime Exchange for the Delaware River and Bay: "Due to a number of complex structural problems with the RFS, the price of [RINs] has soared to untenable levels...we hope that the Administration will work to achieve meaningful resolution to this issue before it is too late." *Letter to EPA, May 2021.*

The Pilots' Association for the Bay and River Delaware: "The RFS is not currently operating as Congress intended; without reform, the livelihoods of thousands of people are at risk, and the economic vitality of the tristate region will suffer significant negative consequences." *Letter to EPA, May 2021.*

African American Chamber of Commerce of Pennsylvania, New Jersey and Delaware: "The Renewable Fuel Standard is severely broken, and without reform, the ripple effects threaten the livelihoods of countless Americans, but especially those in our region. The local pump supplier, consulting engineers, members of numerous local trade unions will all suffer greatly. The refineries in our region are in crisis, and the time for action is running out. You have the ability to take steps to protect the employers and business owners that are a part of the constituency of the AACC, and the communities where they domicile." *Letter to EPA, August 2021.*


African American Chamber of Commerce of New Jersey: "Within the past decade, the Northeast has lost 1.5 million barrels per day – or roughly 70% – of its refining capacity, making our region already more dependent than it should be on imported fuel from foreign countries. The ability to have reliable fuel production capabilities in different regions of the United States is a matter of national and energy security." *Letter to EPA, July 2021.*

New Jersey Motor Truck Association: "Our members proudly employ 40,000 New Jersey residents who are the keystones of our industry. Beyond NJMTA, our American independent refineries provide positive impacts for our countless businesses and working families in New Jersey and beyond. Please implement common-sense RFS reforms now before it's too late." *Letter to EPA, October 2021.*

New Castle County Chamber of Commerce: "Unfortunately, the intended consequences of how the federal Renewable Fuel Standard (RFS) is administered is putting this critical business at risk. While complicated, in short, the program requires merchant refiners like Delaware City to buy tradeable credits called Renewable Identification Numbers, or, 'RINs,' from their 'Big Oil' competitors and large retailers that control the only point in the supply chain where RINs are generated." *Letter to EPA, July 2021.*

Chemistry Council of New Jersey: "A reasonable solution can be achieved that both promotes the continued use of biofuels in this country while also ensuring that America's independent refiners can continue to stay in business without the heavy and unnecessary burden forced upon them by the broken RFS program. The refineries in our region are in a crisis, and the time for action is running out." *Letter to EPA, July 2021.*

New Jersey Business & Industry Association: "We urge [EPA] to grant the waiver requests and set reasonable RFS standards moving forward to protect the businesses and employees who rely on a stable energy system." *Letter to EPA, June 2021.*



NJ Gasoline, C-Stores, and Automotive Association: "Since 1937, NJGCA has proudly represented New Jersey's gas stations, convenience stores and automotive repair shops. Our members are small businesses that rely on a reliable supply of refined gasoline and other petroleum products, all of which are supplied by independent refiners in our region. Our membership is concerned that the RFS threatens the longer-term viability of last remaining independent refineries on the East Coast." *Letter to Biden Chief of Staff Ron Klain on May 18, 2022.*

Chamber of Commerce of Southern New Jersey: "Without action soon to fix the RFS, the last remaining refineries in the Northeast could close their doors forever, taking with them thousands of direct jobs and tens of thousands of indirect jobs at a time when the South Jersey regional economy and CCSNJ members are beginning to recover from the pandemic." *Letter to EPA, May 2021.*

Gloucester County Chamber of Commerce: "The RFS is severely broken, and without reform from the Biden administration, the ripple effects threaten the livelihoods of countless Americans, but especially those in the South Jersey region." *Op-ed with the Chamber of Commerce of Southern New Jersey in the CourierPost, July 2021.*

Pennsylvania Bus Association & New Jersey Motor Coach Association: "Our members proudly play critical roles in Pennsylvania's and New Jersey's transportation and tourism industries. Every day, we see firsthand how important our American refineries are to countless businesses and working families. Please take this opportunity to implement common-sense RFS reforms." *Letter to EPA, September 2021.*

Mechanical & Service Contractors Association: "As refiners struggle to stay afloat among slumping demand and massive financial losses because of the pandemic, RIN prices skyrocketed, climbing from under ten cents at one point last year to over one dollar and thirty recently, a greater than 1500% increase." *Letter to EPA, April 2021.*

SMALL BUSINESSES, ASSOCIATIONS, AND INDUSTRY GROUPS (CONTINUED)

- Associated Builders and Contractors (ABC)
Eastern PA Chapter
- AIM Mechanical Services, LLC
- Alphasource
- Asher's Chocolate Co.
- A.T. Chadwick Company, Inc.
- Brandenburg Industrial Service Company
- Brenntag North America, Inc.
- Brock Industrial and the Brock Group
- Cintas
- Commerce Construction Corporation
- CUST-O-FAB
- Flowserve
- F.W. Webb Company
- JJD Electric, LLC
- JJ White Incorporated
- J.R. Metzger, Inc.
- Mercer Gasket & Shim
- MP Projects Inc.
- Nooter Integrated Multi-Craft Contractors
- Pennsylvania State Lodge Fraternal Order of Police
- Quality Testing Services, Inc.
- Railroad Construction Co.
- Riggs Distler
- Royal Electric Supply Company
- Sunair Co.
- Swagelok
- U.S. Environmental, Inc.
- U.S. Training Consultants, LLC
- Vallen Company
- William A. Schmidt and Sons
- Weston Solutions, Inc