



February 16, 2021

Submitted via: www.regulations.gov

William Charmley, Director
Office of Transportation and Air Quality
Assessment and Standards Division
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105

Re: EPA-HQ-OAR-2020-0322 - Receipt of Petitions for a Waiver of the 2019 and 2020 Renewable Fuel Standards

These comments are submitted on behalf of the 850,000 members of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("United Steelworkers", "Steelworkers", or "USW"). The USW represents working people across multiple sectors, including approximately two thirds of domestic petroleum refining, accounting for 30,000 high wage, community supporting jobs at over 75 locations across the country.

We write you in support of the governors' petitions seeking a waiver of the Renewable Fuel Standard (RFS) obligations that apply in 2019 and 2020. The decrease in fuel demand caused by the Covid-19 pandemic, combined with skyrocketing compliance costs from the unregulated renewable identification number (RIN) market, have put a number of the workplaces we represent on an unsustainable course and threatened their viability.

The USW stands ready to work with the Environmental Protection Agency (EPA), and all stakeholders, on behalf of our membership for broad RFS reform that protects our communities and the family supporting jobs we depend on. Granting the waivers will provide short term relief while we work together on long term solutions.

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

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

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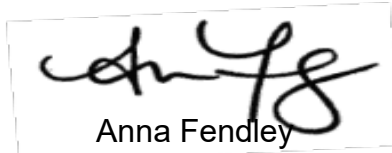
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economy in the future. Our union wants to prevent bad policy, like the unregulated RIN market, from being a major contributor to the loss of union jobs and the import of product.

In the absence of comprehensive reform, USW urges EPA to grant the governors' waivers. As a stakeholder representing the majority of domestic refining workers, we ask that our members, and all working Americans, be considered as a top priority when making this decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Anna Fendley", enclosed in a thin black rectangular border.

Anna Fendley
Director of Regulatory and State Policy
United Steelworkers (USW)

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