BRAND SAFWAY

August 4, 2025

Dear Administrator Zeldin:

The following comments are being submitted in connection with the Environmental Protection Agency's ("EPA") proposed rule entitled, "Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes," Docket ID - EPA-HQ-OAR-2024-0505.

On behalf of everyone at BrandSafway, I'm writing to you today to advocate for reform to the Renewable Fuel Standard (RFS), and specifically, to offer our belief that modifications to the recently announced RFS "Set 2" Renewable Volume Obligation (RVO) are urgently needed. Absent such revisions, as outlined below, our region's last remaining oil refineries could be forced to close their doors forever, eliminating more than a thousand direct jobs and causing irreversible reverberations in the Northeast region that will impact tens of thousands of indirect jobs, including those provided by our company.

BrandSafway is one of the world's leading specialized service providers in the heavy industrial market. We employ over 38,000 people, many of whom work throughout the Northeast region. We deliver scaffold systems and other forming and shoring solutions for our customers, and many of the people we employ are members of local unions. In the case of Monroe Energy's Trainer, PA refinery, our personnel are members of the Laborers Local Union 413, the Insulators Local Union 14, and the Carpenters Local Union 255.

Refineries, particularly those in the Northeast, have one of the highest job multipliers of any industry in the country. We know this because, according to Business & Industry Connection Magazine, a 2025 report found that the refining industry has a 46x job multiplier, meaning that for each direct job at an oil refinery, 45 other jobs are supported throughout the economy. This is the highest job multiplier of any U.S. industry. Refineries rely on the material support, personnel, and expertise that companies like ours provide to them. Their dependence on BrandSafway and many other businesses supports thousands of good paying, family-sustaining jobs throughout the tristate region - an interdependence which has been a major boon to our regional economy for decades. And although our personnel are contractors at Monroe Energy, many of them effectively work at the facility full time, which is a testament to the breadth and depth of personnel it takes to run a facility like that.

But the RFS in its current form threatens the continued viability of independent refiners, particularly in the Northeast, and it is therefore also a direct threat to the economic well-being of our company and the workers whose jobs it provides. For years now, local independent refiners like Monroe Energy and PBF Energy have been forced to buy RFS compliance credits known as RINs at exorbitant prices, and these credits have swung wildly from just pennies per credit to a high of $2.00 in recent years. Additionally, it is worth noting that these expenditures have done very little to create actual benefits for the environment, as noted by The National Wildlife Federation and others, or to help expand renewable fuel production, or to benefit hard-working American farmers.

This is a critical issue for our region, and without a change to the program's current structure, starting with the proposed blending requirements for 2026 and 2027, 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.

We respectfully request that EPA consider taking the following steps to alleviate the disproportionate impact caused by the current structure of the RFS, and the potential for further harm that the proposed RVO will create:

1. **Set ethanol volumes at 14.2 billion gallons, to align with the highest volume likely to be consumed given the current engine and infrastructure limitations, as the U.S. Energy Information Administration (EIA) found. This would also help decouple D6 (ethanol) RINs from D4 (biomass-based diesel) RINs costs.**

2. **Set the biomass-based diesel RVO no higher than actual domestic production levels in 2024. This would incentivize more efficient 'advanced biofuels' that meet the goals of the RFS program without setting unachievable volumes that send RIN prices soaring, further crippling small and independent refineries.**

3. **Grant small refinery exemptions (SRE) and stop the practice of "reallocation," wherein the EPA increases RFS requirements on refiners that do not receive SREs. This is important, because SREs do not reduce biofuel demand, but reallocation absolutely raises RIN costs.**

The economic well-being of many businesses in Pennsylvania, New Jersey, and Delaware (and indeed, nationwide) is 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.

Sincerely,

Harry Moore

Harry Moore
BrandSafway