



August 7, 2025

**The Honorable Lee Zeldin, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460**

**RE: 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**

Dear Administrator Zeldin:

On behalf of the Chamber of Commerce for Greater Philadelphia (the Chamber), I write to urge the U.S. Environmental Protection Agency to reduce the nationwide Renewable Fuel Standard (RFS) volume mandates and provide critical relief to our region's last remaining refineries.

The Chamber brings together business and civic leaders across the 11-county tri-state Greater Philadelphia region to champion business growth and job creation that helps everyone in our community thrive. We recognize energy as foundational for job creation beyond its sector, including its use for powering emerging technologies such as artificial intelligence, modernized transportation systems, and resilient infrastructure.

The RFS, established in 2005 as part of the Energy Policy Act, was well intentioned in its goal to reduce the country's dependence on foreign oil by increasing our usage of domestic resources. Unfortunately, however, this program has veered wildly astray from its original intent. The RFS has already contributed to at least four independent refinery closures, eliminating over 80,000 high-quality, family-sustaining jobs and the loss of more than 1.4 million barrels per day in lost domestic refining capacity.

Refineries across the Northeast remain critical to our region's economic vibrancy and our nation's energy security, yet it is well known that the RFS has imposed an undue economic burden on independent refineries of all sizes, especially those in the Greater Philadelphia region. With refineries providing one of the highest job multipliers of any industry in the country, the substantial impact of reduced domestic refining capacity over the last decade is felt across industries and communities. Here on the East Coast, where 35% of the U.S. population lives, just four large refineries remain. We cannot risk diminished energy independence and further job loss from any more refinery closures.

Under the program, refineries function as 'obligated parties' and are unequipped to blend biofuels into the fuels they produce and, to fill this gap, they must purchase Renewable Identification Numbers (RINs) as credits in an open and unregulated market. Combined with rampant market speculation, the commoditization of RINs by larger multinational conglomerates and non-obligated parties has resulted in a major unintended consequence: independent refiners must spend billions of dollars specifically and exclusively to comply with the RFS mandate.

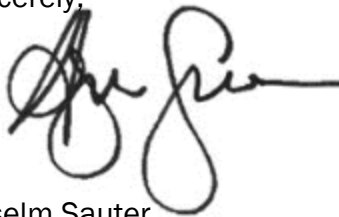
For many years, the Trainer Refinery located in Southeastern Pennsylvania has experienced annual RFS compliance costs that have exceeded what the company paid to purchase the entire facility and associated assets. RIN prices have increased by 75% since January 2025, without increasing biofuel production or the percentage of ethanol blended into gasoline and without providing any real environmental benefit. Further, the RFS adds up to 20-30 cents per gallon to the cost of fuel, a cost felt both by consumers and by our member businesses who are already faced with rising costs due to inflation, supply chain challenges, and more.

**This model is inefficient, unsustainable, and unbalanced. A more balanced RFS program has the potential to benefit farmers and support the expansion of renewable fuel use without creating an insurmountable financial burden for America's independent refiners.**

We urge the EPA to lower its proposed ethanol blending requirements to 14.2 billion gallons for each year in the final rule. Doing so would reflect the federal government's commitment to the nation's transportation fuel supply, bring down the cost of RINs, and protect the jobs and energy security of our region and nation.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anselm Sauter', with a stylized, flowing script.

Anselm Sauter  
Vice President, Government Affairs  
The Chamber of Commerce for Greater Philadelphia