



DELAWARE COUNTY AFL-CIO COUNCIL

February 12, 2021

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United Steelworkers

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Workers 19

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Roxanne Hoag, SEIU 668

Trustees

Bud Farally, Sheetmetal
Workers 19

Devon Crawford,
USW 10-234

Tim McLaverty,
IBEW 654

Submitted through the Federal eRulemaking portal:

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: Docket ID No. EPA-HQ-OAR-2020-0322

Comments in support of the PA Governor Wolf's May 11, 2020 petition urging the Environmental Protection Agency (EPA) to address severe economic harm by issuing a waiver from Renewable Fuel Standard (RFS) volume mandates

On behalf of 30 the Local Unions and more than 24,000 members of the Delaware County Labor Council, I'm writing to express our strong support for Pennsylvania Governor Tom Wolf's petition to address severe economic harm by issuing a waiver from Renewable Fuel Standard (RFS) volume mandates. This issue is critically important to the economic vitality of our region and to our nation's energy security.

For many years, the excessive cost of RINs has been putting merchant refineries around the country in jeopardy. These costs contributed to the bankruptcy of a Philadelphia refinery, and with only three large refineries remaining on the East Coast, we must take proactive steps to protect these facilities, and the family supporting union jobs they provide, as they are major economic drivers in the northeast. The ongoing pandemic has further magnified this issue, and unless something is done soon, this unsustainable trajectory will lead to even more refinery closures. The labor movement stands ready to work with you to protect American jobs and our national security.

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We urge you to grant Governor Wolf's petition and work with all stakeholders on RFS program reforms including direct reforms to the RIN market. This action will not only benefit workers employed at our refineries, but also the thousands of trade jobs that skilled craft members depend on to support and sustain them. Our region cannot afford to lose these jobs and the massive economic infusion that these facilities generate.

For all of these reasons, we strongly support Governor Wolf's petition.
Sincerely,

George Piasecki III

George Piasecki, President
Delaware County AFL-CIO

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