

July 23, 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,

As the President of the Delaware County Chamber of Commerce, whose mission it is to drive business forward in our community of Delaware County, Pennsylvania, I write to voice our strong support for a meaningful fix to the Renewable Fuel Standard (RFS). In its current state, the RFS is wreaking havoc on our nation's independent refiners, especially the last remaining ones here in the Northeast where 35% or the U.S. population lives. Absent meaningful reform, beginning with revisions to the proposed RVOs, these refiners may disappear forever, taking with them thousands of direct jobs along with the tens of thousands more that indirectly rely on these facilities, all while also greatly diminishing our country's energy security. We cannot allow this to happen.

When Monroe Energy restarted the Trainer Refinery in 2012, there was a collective sigh of relief here in Delaware County. Dating back to the early 1900s, multiple generations of workers have found employment and built careers at this facility, providing them with a lifetime of family-sustaining work. Restarting the facility has not only proven valuable to the direct employees who got their jobs back; it has also been a boon to our regional economy as well, as Monroe has invested over \$2 billion dollars in capital improvements, and nearly \$4 million in contributions to local and regional charities. Furthermore, Monroe has been a vital partner in the economic revitalization of our county and to the energy industry here in Pennsylvania.

It takes a lot of support to operate a facility like Monroe Energy, and many local businesses here in Delaware County and throughout our region depend on the work opportunities the refinery provides. In addition to the 500+ highly skilled employees who work at the facility full time, hundreds of talented contractors perform work at the site every day, including members of the Philadelphia Building Trades. Monroe utilizes the services of nearly 1,000 different contractors, suppliers, and other businesses. This provides not only a major benefit to Delaware County but also has an impact that reverberates throughout our tristate region and across the country. The refinery collectively provides millions of dollars of direct tax benefits to local municipalities, school districts, the county, and the Commonwealth. Monroe also has a reputation for doing great work out in the community, with many employees volunteering their time and effort supporting a wide variety of charitable causes and endeavors.

The current state of the RFS threatens all of these crucial benefits that Monroe and other independent refineries provide to their respective communities. Without meaningful reform, these facilities risk closing their doors forever. But the EPA can take steps to provide certainty and clarity on what has historically been a very unpredictable and murky federal program. I respectfully urge the EPA to lower ethanol volume requirements to no more than 14.2 billion gallons in each of the next two years, which aligns with the government's projections for the maximum amount of ethanol that can be blended into gasoline given transportation demand nationwide. Doing so will inject much-needed liquidity into the RIN market, allowing for the cost of RFS compliance to return to reasonable levels. When annual RFS compliance costs frequently exceed wages, benefits, and maintenance costs combined, it creates a untenable situation for refiners like Monroe and is surely not what Congress envisioned when it created the RFS.

The RFS has already contributed to at least four independent refinery closures nationwide and the loss of over 80,000 high-quality jobs. This region can ill afford to lose a major employer like Monroe Energy due to a federal program that has gone awry. It is my sincere hope that the EPA will consider the countless ripple effects that would occur if the Agency does not make meaningful change, again, starting with reducing the proposed RVO to levels that align with the reality of our blending infrastructure and capabilities. Thank you for your time and consideration of my views as a voice for the business community in Southeastern PA.

Sincerely,

Trish McFarland

President

Delaware County Chamber of Commerce

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