



Re: Proposed Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes (Docket ID No. EPA-HQ-OAR-2024-0505)

Dear Administrator Zeldin:

I write today to comment on the Environmental Protection Agency's (EPA) proposed rulemaking, "Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes," Docket ID No. EPA-HQ-OAR-2024-0505. I am emphatically requesting that EPA lower its proposed Renewable Volume Obligations (RVO) for 2026 and 2027 to 14.2 billion gallons, which would represent the highest level of ethanol likely to be consumed while also protecting thousands of refinery jobs and our nation's energy security.

I am a proud Boilermaker who has worked in the refining industry for decades and I have seen firsthand the life-changing opportunities these facilities provide for so many individuals, and in turn, for their families. I have also witnessed how the skilled tradesmen and women at our refineries go to work each day and protect our national energy security.

When the U.S. economy was brought to a grinding halt at the height of the COVID pandemic, it was America's refinery workers who kept our country moving. When global energy markets reeled from Russia's war on Ukraine and later Israel's war against Hamas, refinery workers continued to ensure that Americans had access to gasoline, diesel, home heating supplies, and other refined products that fuel our economy. When OPEC+ implemented production cuts, it was refinery workers who stepped up, strengthening American energy independence. Yet despite all of this, our domestic policies do not always support America's refinery workers, and in some cases, our very policies threaten the long-term viability of the industry.

The RFS was implemented to reduce greenhouse gas emissions and expand renewable fuels, while also reducing our reliance on imported oil and enhancing the nation's energy security. These goals clearly show that the RFS was a well-intended program. However, the current structure of the RFS has led to the reduction of more than 1.4 million barrels of daily collective refining capacity as the result of eight refinery closures, thereby erasing tens of thousands of high-quality, union jobs. That's why Boilermakers Local 13 and many other unions have repeatedly called for reforms to this broken program.

The RFS mandates that transportation fuel sold in the U.S. must contain a certain volume of renewable fuels, such as ethanol. Due to the physical composition of ethanol, most independent refiners are unable to blend it into the fuel supply on-site. In order to comply with the RFS, independent refiners must instead purchase expensive compliance credits known as RINs regardless of their price.

When the RFS first became law, RIN credits cost just a few cents apiece and have soared to as high as \$2.00 over the years. At times, these compliance credits have become so expensive that several refineries in our area have reported spending more on RINs than they do on salaries, benefits, maintenance, and utility costs combined.

Compliance costs under the RFS do not provide any revenue to support the federal government's environmental programs or even to fund environmental infrastructure projects. Instead, independent refiners typically purchase RINs from their competitors, which tend to be "Big Oil" companies that can afford to build and operate ethanol blending facilities. High RIN prices help these companies get rich, but for the rest of us, it acts as a hidden tax. Independent analysis has shown that the RFS raises fuel costs by approximately 20-30 cents per gallon—that's more than the federal tax on each gallon of gasoline.

These insurmountable RIN costs directly threaten U.S. energy independence and national security. The U.S. has lost a substantial amount of refining capacity over the last decade and here on the East Coast where 35% of the U.S. population lives, just 4 large refineries remain. With those closures here on the East Coast, we have lost thousands of high-quality, family-sustaining refining jobs in the process. That represents millions of lost working hours for countless unions, including the Boilermakers Local 13.

The proposed RVO will only make these problems worse because EPA's proposal sets already-unfeasible biofuel blending levels even higher. EPA's new RVO targets for 2026 equate to a 23% increase in advanced biofuels and a nearly 8% increase for all other biofuels, making this the largest single increase the EPA has mandated. Such steep RVO increases will only serve to further burden independent refiners, putting them at increased risk of closure.

In light of this, it's clear that meaningful RFS reform would provide relief to both refiners and consumers alike. One way that the EPA can ensure the success of the RFS and lower gas prices is to finalize blending volumes that more accurately reflect the market realities of transportation fuel demand. The EPA can do so by reducing the ethanol mandate for 2026 and 2027 to 14.2 billion gallons per year so that the volumes more closely align with actual consumption.

On behalf of Boilermakers Local 13 and our members, I respectfully urge EPA to alter the proposed rule and set blending levels at a more reasonable level that reflects the realities of our blending infrastructure and vehicle engine constraints. Thank you for your time and consideration.

Sincerely,



Brad L. Mickatavage
Manager/Secretary Treasurer
Boilermakers Local Lodge No. 13