

# INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

*AFL-CIO*  
Philadelphia Building Trades Council  
Delaware County & Chester County Central Labor Union  
Pennsylvania State Federation of Labor



LOCAL UNION No. 654  
3729 Chichester Avenue  
Boothwyn, PA 19061-3135  
(610) 494-2820 • Fax (610) 494-3913  
[www.ibew654.com](http://www.ibew654.com)  
Facebook: [ibew Sixtyfour](#) Twitter: [@ibewlu654](#)

July 22, 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:

I proudly serve as President and Assistant Business Manager for the International Brotherhood of Electrical Workers Local 654. Since 1939, our union has served southern Delaware and Chester Counties in Pennsylvania by providing critical electrical services work for countless businesses, including the region's independent refining sector.

Local refineries are key partners for our union, regularly providing high-quality work opportunities for many of our nearly 700 members. The EPA's recent RVO proposal directly threatens the viability of independent refiners, along with the countless other industries across the supply chain, including others that employ IBEW members. This is why it's imperative that the EPA revise the proposed blending volumes downward before it's too late.

For decades, thousands of our members have relied on local refineries like Monroe Energy to provide them with life-changing opportunities to earn a great living and support their families. But unfortunately, this reality has continuously come under threat because of the current structure of the Renewable Fuel Standard (RFS) program. When the EPA fails to appropriately adjust RVOs, the mismatch between actual demand versus mandated, unrealistic blending volumes inflates RIN prices. Some reports have already noted that the EPA's proposed RVO for the next two years would all but guarantee that the U.S. is headed for another RIN shortage. We've seen this play out before - an overly aggressive blending mandate coupled with an already depleted RIN bank had credit prices soaring to \$2.00 per credit in recent years. The EPA must realign the ethanol blending number to 14.2 billion gallons in the final rule in order avoid higher compliance costs to our nation's last independent refiners, and higher costs at the pump for consumers.

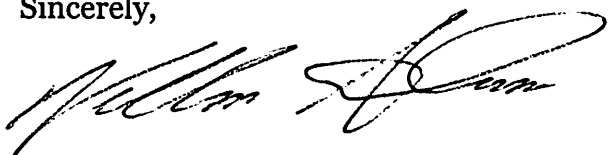
For far too long the cost of RIN credits has been one of the highest expenses independent refiners have had to shoulder. In many years for example, Monroe Energy has spent more on RINs than they do on salaries, benefits, maintenance, and utility expenses combined! It doesn't take an expert to recognize that this system is unsustainable.

As touched on above, EPA's recently proposed volumes do not reflect the federal government's own projections for demand of ethanol. In fact, the agency's proposal calls for nearly one billion gallons of ethanol more than was consumed in 2024 or is expected to be consumed this year. Unless the agency lowers these proposed volumes to mirror demand forecasts, RIN costs will continue to balloon.

When independent refiners invest in major maintenance projects, it's our members whom they turn to. When refiners are confronted with unpredictable and runaway compliance costs, that causes them to defer capital projects and facility upgrades. In turn, our members lose out on great work opportunities – work that puts food on the tables of my members' families and puts their kids through college.

On behalf of IBEW Local 654, **I urge the EPA to lower its proposed ethanol blending requirement for 2026 and 2027 to 14.2 billion gallons in the final rule**, to preserve the volume integrity and in keeping with the federal government's own projection of what is capable of being blended into the nation's transportation fuel supply. Doing so, will help to bring down the cost of RINs, freeing independent refiners to reinvest the money spent on RINs in their facilities instead. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Adams", with a stylized flourish at the end.

Bill Adams  
President & Asst. Business Manager  
I.B.E.W Local 654