



**IRON WORKERS LOCAL UNION #451**  
**203 Old DuPont Road**  
**Wilmington, DE 19804**

July 31, 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 write to you on behalf of the 200+ strong members of the Ironworkers Local Union 451. Covering the entire state of Delaware along with counties in Pennsylvania and Maryland, our highly trained and dedicated members are essential in a variety of both commercial and industrial projects, including critical work performed at refineries. On behalf of our members, I want to express the urgent need for meaningful action in reforming the Renewable Fuel Standard, starting with revising the proposed ethanol blending volumes downward.

For years, the EPA and multiple administrations have been aware of the challenges posed by the RFS when proposed blending volumes are set too aggressively. This inevitably causes a shortage of available and affordable RINs in the marketplace, further depleting the RIN bank, and forcing RIN compliance credits to skyrocket. Today, RIN costs are hovering around a dollar per credit, which is something Congress never envisioned. For the three refiners in our region, it's costing them hundreds of millions of dollars each year, which is money they aren't able to then reinvest into their facilities – meaning our members have less work than they could have otherwise.

Unless significant steps are taken soon, independent refiners in our region and more throughout the country could close their doors forever, creating an economic crisis that will devastate working families and compromise our national energy security for years to come.

Since 1934, Local 451 has served Delaware, Cecil County, Maryland, and Southeastern Pennsylvania, providing the literal foundation and framework for countless building projects throughout our region, including bridges, power plants, steel mills, manufacturing plants, and more. We have built and continue to build some of the most important pieces of infrastructure that many of us use and rely on every day.

Local refineries are key partners for our union and regularly provide high-quality work opportunities for our members, which in turn allows our union to invest in training and to reinvest in our communities through our charitable and volunteer efforts. When refineries invest in new capital or major maintenance projects, they typically employ an additional 1,000 or more skilled union craft workers.

This is that beneficial ripple effect of indirect jobs that so many people reference in today's economy. I'm here to tell you that it's real and it's meaningful.

In recent years, compliance costs associated with the RFS have consistently been unpredictable and oftentimes high. The refineries that are most impacted by this are the independent operators like PBF Energy and Monroe Energy, who collectively operate three of the four major refineries remaining on the entire East Coast. Refining margins aren't tied to RFS compliance costs, making it much harder for independent refiners to endure. If the EPA doesn't take action to rein in runaway RFS compliance costs soon, our domestically produced fuel suppliers and our members' jobs will be at serious risk.

We may not be able to predict or control what happens to our economy as a result of events like the pandemic or wars overseas, but we can take reasonable steps to address the harm that our independent refiners have already sustained because of the broken RFS program. EPA now has an opportunity to create an environment where RFS compliance costs will not rise to unsustainable levels. Therefore, we urge the EPA to set a reasonable RVO that reflects the realities of our existing engine and blending infrastructure, and that means lowering the ethanol blending volumes to 14.2 billion gallons for each year of the proposed rule. This is an important step that will ultimately help consumers and protect union jobs and American families. Thank you for considering our perspective.

Sincerely,

Richie Jordan



Business Manager

Ironworkers Local 451