



• **CONSTRUCTING WITH KNOWLEDGE.
SERVICE WITH INTEGRITY AND SAFETY.®**
SINCE 1920

5500 BINGHAM STREET
PHILADELPHIA, PA 19120
TEL: 215-722-1000

July 28, 2025

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 Lee Zeldin:

I appreciate the opportunity to provide comments on the Environmental Protection Agency's (EPA's) federal biofuel mandate - the Renewable Fuel Standard (RFS). J.J. White, Inc. would like to express our concerns regarding the EPA's rulemaking for RFS volumes in 2026 and 2027 as proposed and request the EPA make thoughtful changes in the final issuance of the rule.

J.J. White, Inc. was founded by my great-great-grandfather in 1920 and over the decades has evolved into a single-source, multi-trade contractor servicing a wide array of industries and projects in the Mid-Atlantic region. Over the years, our highly skilled craftsmen and women have worked in the Greater-Philadelphia region on constructing everything from vital infrastructure such as the Walt Whitman Bridge and Children's Hospital of Philadelphia to well-visited landmarks such as the Liberty Bell Pavilion and Philadelphia Convention Center. Today, we proudly serve as one of the largest contracting employers in the Mid-Atlantic, and we have an ever-expanding footprint in the Midwest. When Northeast and Midwest refineries undertake critical capital projects and major infrastructure enhancements, they call upon J.J. White.

Independent refiners are critical to our energy and national security, as they provide the necessary diversity for our national fuel production capabilities. However, our nation has experienced significant losses of refining capacity, and we are now seeing the adverse effects of this is reality. For example, roughly 15 years ago on the East Coast alone, there were a dozen regional refineries, and today, just four mid-size refineries remain. To put this into perspective with respect to fuel supply, the Northeast has lost 1.5 million barrels per day – or roughly 70% – of its refining capacity, making our nation more dependent than we should be on imported fuel from foreign countries and weakening American energy independence. Moreover, this lost refining capacity has meant diminished project opportunities and fewer good-paying jobs for our workforce.

The RFS began as a well-intended program when it was established, but the reality is that it isn't working as Congress envisioned. Haphazard and arbitrary blending requirements have been particularly harmful to independent refiners, who generally do not have large-scale blending operations and are thus left with no alternative but to purchase Renewable Identification Numbers (RINs) for program compliance. RINs have skyrocketed in cost for a combination of reasons, including high demand, limited supply, speculation in the market by non-refiners, and a flawed program design desperately in need of an overhaul.

GENERAL, MECHANICAL, & ELECTRICAL CONSTRUCTION
HVAC & PLUMBING SERVICE
API 650/653 TANK WORK
HYDROBLASTING & ROTATING EQUIPMENT SERVICES

PHILADELPHIA, PA
NEW CASTLE, DE
WHITING, IN
BOSTON, MA
ROXANA, IL

www.jjwhiteinc.com

The recently proposed Renewable Volume Obligation (RVO) for 2026 and 2027 is highly problematic, and the mere announcement of this proposed rule elevated RIN prices by 30%. This proposal sets unrealistic blending requirements that are completely inconsistent with reality given vehicle and fueling infrastructure limitations. The EPA has acknowledged that a healthy RIN bank is necessary to provide liquidity and keep RIN credit prices in check, but the proposed RVO ensures that this cannot happen, because it will further drain the already-diminished RIN bank.

Under the existing rule, a RIN is generated for each gallon of biofuel, whether it is domestically produced or imported, or whether it comes from domestic or imported feedstocks. In this proposed rule, imported biofuels and domestic biofuels produced from imported feedstocks would only produce 50% of the value of a RIN, compared to domestic biofuels produced from domestic feedstocks. While incentivizing domestic biofuels and feedstocks is admirable on its face, domestic feedstocks have already increased as a result of this proposal and will continue to do so if left unaddressed in the final rule. The current proposal essentially is creating higher prices for refiners and thus higher prices at the pump for consumers. If the EPA claims that domestic sources will supply additional volumes, then the baseline should also be based on domestic volumes.

Independent refiners have long reported spending more (hundreds of millions of dollars) on annual RFS compliance costs than their payroll, benefits, utilities, and maintenance costs combined. 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, lower gas prices, and reduce the harm caused to refiners and the people they employ is to finalize blending volumes that more accurately reflect the 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 and setting the biomass-based diesel volumes at actual consumption levels so that the volumes more closely align with what the EIA projects fuel demand will be.

On behalf of the hardworking men and women at J.J. White, I appreciate the opportunity to submit these comments, and we respectfully but fervently request that the EPA lower the ethanol and biomass-based diesel RVOs in the final rule.

Sincerely,



George Packer
Owner
J.J. White, Inc.