



Laborers' International Union of North America Local 413

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Affiliated with the American Federation of Labor – CIO and
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July 27, 2025

RE: Comments to EPA: Proposed rule for the 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 appreciate the opportunity to provide comments on EPA's proposed Renewable Fuel Standard (RFS) rulemaking for 2026 & 2027. I have the distinct pleasure of serving as the Vice President and Business Agent for the Laborers' International Union of North America Local 413, commonly known as "LIUNA." On behalf of the hundreds of members of our union, I must convey the urgent need for swift and meaningful reform to the RFS program. Local refineries are key partners for our union and regularly provide high-quality work opportunities for our members. Unless significant steps are taken soon, independent refiners in our region and throughout the country will face an uncertain future, which could lead to an economic and energy crisis that would devastate working families and compromise our national fuel security for years to come.

Chartered on November 2, 1936, LIUNA and our membership believe in the union's commitments to unity, education, safety, and community. Local 413 is proud to say that through our efforts, members earn family-supporting wages, good benefits, and the opportunity for advancement and better lives. Our union members are a skilled and experienced workforce trained to work safely in the construction and energy industries. We work across every area of the energy sector and build crucial infrastructure –from roads, bridges, and transit systems to schools and skyscrapers. We also regularly engage in important community service projects in our neighborhood –building playgrounds, cleaning up parks, and so much more.

Our local union's headquarters is a short distance from the Trainer Refinery, and we've worked very hard to strengthen the interdependence between our union and the refinery. As a result, hundreds of our members have consistent, high-paying jobs, which in turn allows our union to invest in training and thereby reinvest in our communities through our charitable giving and the volunteer efforts mentioned above.

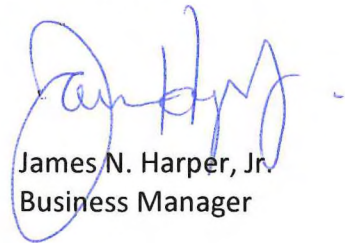
When refineries invest in new capital or major maintenance projects, they typically employ an additional 1,000 or more skilled craft workers, including a large contingent of Laborers' Local 413 members. Increasingly, the RFS program has posed a significant threat to our regional refineries. Wildly volatile and

often excessive RIN prices have forced refineries like Trainer to make difficult decisions on what projects they can afford to undertake, and the result is that some of these facility investments are unable to be budgeted due to the undue burden caused by expensive RINs. There is a tangible link between high RIN prices and the risks to our members' jobs; this further cascades into our nation's ability to produce affordable, reliable, and predictable fuel inventories. This fact is not conjecture. It has been widely reported that high RIN prices have contributed to numerous refinery closures nationwide and at least one refinery bankruptcy right here in our region.

While we cannot predict nor control what happens to our energy economy as a result of geopolitical events or global markets, EPA can take tangible steps to rectify the harm that our independent refiners have endured due to the broken RFS program. Therefore, it's my sincere hope that the EPA will take my concerns and the concerns of the Laborers' Local 413 members seriously and revise the recent RVO rule downward to reflect the reality of our country's actual blending capabilities. Reducing the RVO to 14.2 billion gallons for both of the next two years will lead to a relief in RFS compliance costs, without negatively impacting blending or our nation's farmers and biofuels producers. Additionally, EPA should honor the RFS's guiding rules in earnestly reviewing and granting Small Refinery Exemptions (SREs), *without* reallocating volumes. EPA's delayed decisions on SREs have caused unacceptable uncertainty for both small refiners and the RFS program as a whole.

Refineries in our region want to invest in the next generation of green energy technology, and the projects that are necessary to achieve that reality will require large dollar investments, which require the skill and expertise of our union. Therefore, we respectfully urge the EPA to set reasonable RFS standards moving forward to protect the union jobs and American families that form the backbone of this country. Thank you for your consideration of our request.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "James N. Harper, Jr.", is written over a circular blue stamp. The signature is fluid and cursive, with a large initial "J" and "H".

James N. Harper, Jr.
Business Manager