



MP Projects Inc.

P.O. Box 487
Glen Mills, PA 19342

610.742.3424 | obetego@gmail.com

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

Dear Administrator Zeldin,

On behalf of MP Projects (MP), I write to advocate for reasonable and attainable Renewable Volume Obligations (RVOs) in EPA's final rule on Docket ID: EPA-HQ-OAR-2024-0505. MP Projects is a small multi-discipline engineering company that provides engineering services to refinery operators throughout the country. Currently, MP has 17 engineers working in 5 different refineries – all of which are operated by independent refiners. These refineries provide MP with incredible opportunities, as they do for tens of thousands of others. As such, MP is compelled to express the need for the proposed RVO to be lowered to 14.2 billion gallons in the final rule for 2026 & 2027.

MP specializes in projects that provide energy efficiency improvements and enhancements that achieve environmental compliance. The projects that we work on create measurable benefits for the environment by reducing the overall environmental footprint of the refining process. From electrical infrastructure and power upgrades to process unit efficiency projects, we spend our time helping refiners make technological upgrades and improvements to their operational capabilities.

Virtually every project we work on involves significant outlays of capital by the different refining companies. Most projects cost multiple millions of dollars. In some cases, projects are undertaken out of a regulatory necessity, but in many instances, companies undertake projects out of a desire to reduce their environmental footprint and to make their processes even safer and more efficient. The companies I work for have a strong desire to do these projects for the right reasons, but there remains a significant impediment to what *is* being done versus what *could* be done if more capital were available.

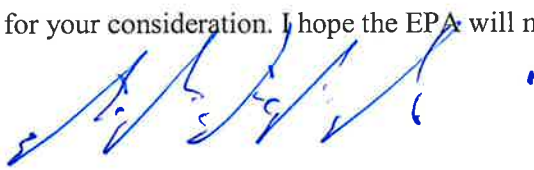
For years, independent refiners have been raising the alarm about the crushing financial costs of RFS compliance. Spending hundreds of millions of dollars on RFS compliance each year is not what Congress envisioned when it passed the Energy Policy Act in 2005, and this money isn't even directly benefiting the environment; one of the policy aims of the original bill. Today, a disproportionate amount of the money exchanged through RFS compliance ends up benefitting large multinational oil conglomerates and Wall Street traders and does not get reinvested into environmental programs. For these reasons and more, the program is not functioning as intended.

The refiners that MP works with are very keen on producing the next generation of clean transportation fuels. Yet many of these projects cannot move forward without significant outlays of capital. Refiners budget and plan for facility improvements many years in advance, and timely progress on important projects gets delayed when refiners are forced to spend hundreds of millions annually on RFS compliance instead of investing that money in their facilities. RIN prices have fluctuated wildly, with prices spiking in recent years for no rational reason. Eventually, these compliance costs will be more than many independent refiners can continue to withstand.

MP respectfully and seriously urges the EPA to lower the proposed ethanol blending volumes to 14.2 billion gallons per year in both 2026 & 2027. Doing so should provide greater RIN availability and lower compliance costs, allowing refiners to invest even more money into their facilities to support environmental and energy efficiency enhancements in the years to come.

Thank you for your consideration. I hope the EPA will make these important changes in the final rule.

Sincerely,



Mike Piorkowski
President
MP Projects

Project Management, Engineering, Design and Consulting Services