



THE VOICE OF OHIO'S HIGH-TECH CHEMISTRY COMMUNITY...  
MAKING A BETTER WORLD FOR ALL OHIOANS.

JENN KLEIN, PRESIDENT

Board of Directors

Chair – Rich Rogers  
Covestro

Vice Chair – Karleen James  
Dover Chemical

Treasurer – Hadley Stamm  
PPG

Past Chair – David Hurder  
McGean

John Ambrozy  
Kraton Polymers  
Chuck Almroth

Jones-Hamilton Company  
Ken Armstrong  
RPM International  
James Bull

Capital Resin Corporation  
Joseph Bush  
Solvay

Fernando Carvalho  
Ashland  
Mike Groh

Emery Oleochemicals  
Steel Hutchinson  
GFS Chemicals  
Daniel Isaacson

The Lubrizol Corporation  
Richard Jackson  
ASHTA Chemicals  
Joseph Bianco  
INEOS Nitriles

Jonathan Kammerer  
Americas Styrenics  
Matthew O'Connor

Zaclon LLC  
Rob Paxton

Shepherd Chemical Company  
MJ Rea-Jordan  
Univar

Heather Rutz  
Cenovus Lima Refinery  
Chris Shaul  
DuPont

Terry Snell  
BASF

Tom Steib

The Elco Corporation

February 4, 2022

U.S. Environmental Protection Agency  
Docket ID No. EPA-HQ-OAR-2021-0324; FRL-8521-02-OAR

Re: Ohio Chemistry Technology Council Comments on EPA's Renewable Fuel Standard (RFS) Program

To Whom it May Concern:

The Ohio Chemistry Technology Council (OCTC) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) rulemaking entitled "Renewable Fuel Standard Program: Renewable Fuel Standard Annual Rules" published in the Federal Register at 86 FR 72436 on December 21, 2021.

OCTC is the leading advocate for Ohio's chemistry industry. Ohio is the third largest chemical manufacturing state in the United States. The chemistry industry in Ohio employs over 40,000 people, pays an average wage of over \$100,000, and generates more than \$479 million in state and \$870 million in federal taxes each year.

The OCTC represents manufacturers who rely on petrochemical feedstocks and transportation fuels produced by refineries to compete in the marketplace. Our members also recognize the importance of renewable fuel sources, such as ethanol, in securing sustainable energy sources into the future. OCTC supports an all of the above approach to managing our country's energy resources and recognize the critical role that renewable energy sources play in the marketplace.

While OCTC's comments on the entirety of Renewable Fuel Standard (RFS) Program would be quite lengthy, we would like to focus our comments on one area of significant concern, the proposed biofuel volumes for 2022. The proposed 15 billion gallon ethanol requirement is not only the largest ever proposed, but it is also currently unachievable based on our current fuel supply and blending capacity. The result of this untenable obligation would be to further put a strain on the Renewable Identification Numbers



THE VOICE OF OHIO'S HIGH-TECH CHEMISTRY COMMUNITY...  
MAKING A BETTER WORLD FOR ALL OHIOANS.

JENN KLEIN, PRESIDENT

(RINs) market, which would have devastating economic impacts to refiners, some of whom are now paying more for RINs than all other operating costs combined.

The economic impacts would not end with the refiners themselves. Continued upward pressure on the RINs market will also drive up transportation fuel costs for our regional consumers, businesses, and airports. Refiners will also be forced to pass these costs on to our other chemical manufacturing members through increased chemical feedstock prices. Since our industry makes products that end up in nearly 97% of all manufactured goods, those increased prices will contribute substantially to rising inflation across all industry and consumer sectors. Therefore, OCTC strongly encourages the EPA to set biofuel requirements that can reasonably be achieved in line with expected domestic fuel production.

Thank you for your consideration of this important issue. Ohio is a global leader in the industry of chemistry and we welcome any and all opportunities collaborate with our regulators. Please feel free to reach out with any questions at (614) 224-1730 or [jklein@ohiochemistry.org](mailto:jklein@ohiochemistry.org).

Sincerely,

Jenn Klein  
President  
Ohio Chemistry Technology Council