



#### OHIO CHAMBER CHAMPIONS

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Grange Insurance Companies  
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Open Road Renewables  
Penn National Gaming, Inc.  
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Sedgwick MCO of Ohio  
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Vistra Energy  
Zaino Hall & Farrin

February 4, 2022

U.S. Environmental Protection Agency  
EPA Docket Center, Office of Air and Radiation Docket  
1200 Pennsylvania Avenue NW  
Mail Code 28221T  
Washington, DC 2046

RE: Docket ID No. EPA-HQ-OAR-2021-0324

The Honorable Administrator Michael Regan,

The Ohio Chamber is the state's leading business advocate, and we represent thousands of companies that do business in Ohio. Our mission is to aggressively champion free enterprise, economic competitiveness and growth for the benefit of all Ohioans.

A robust fuel and petrochemical manufacturing sector are key to Ohio's economic engine. However, the U.S. EPA's proposed renewable fuel standard (RFS) renewable volume obligation (RVO) rule will affect regional fuel supply, disrupt supply chains across various industries, and jeopardize thousands of good paying jobs in our state due to the astronomical prices of the Renewable Identification Numbers (RINs).

It is imperative that the U.S. EPA sets a final 2022 RFS RVO ethanol requirement at a level that is reflective of what the fuel supply can sustain. The U.S. Energy Information Administration (EIA) estimates that consumers will buy 138 billion gallons of gasoline in 2022. Given this projection, the maximum amount of ethanol that can likely be blended into the fuel supply given the 10 percent limitation is 13.8 billion gallons. This figure is 1.2 billion lower than the 15-billion-gallon ethanol requirement EPA is proposing for 2022.

Thus, the EPA needs to lower the 2022 conventional biofuel portion of the RFS RVO by about 1.5 billion gallons to 13.5 billion to better reflect the amount of ethanol that can be physically consumed. The EPA should also consider eliminating the proposed supplemental RVO altogether because it would make an already unachievable standard even more unachievable. As a result, there would be a significant reduction in RIN prices which would save Ohio's independent refiners and the fuel they manufacture, the people they employ and prevent even greater prices shocks at the pump.

In conclusion, we encourage the EPA to consider the comments and recommendations above. The Ohio Chamber of Commerce appreciates the opportunity to participate in this process and looks forward to working with the agency going forward.

Respectfully,

A handwritten signature in black ink that reads "Stephanie Kromer". The signature is written in a cursive, flowing style.

Stephanie Kromer  
Director of Energy & Environmental Policy