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VIA ELECTRONIC FILING

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Feb. 17, 2021

RE: Gov. Wolf's May 11, 2020 Petition for a Renewable Fuel Standard Mandate Waiver due to Severe Economic Harm (Docket ID No. EPA-HQ-OAR-2020-0322)

On behalf of the thousands members of the Pennsylvania Chamber of Business and Industry, the largest, broad-based business advocacy organization in the Commonwealth, I write to request you grant for Pennsylvania Governor Tom Wolf's petition to address severe economic harm by issuing a waiver from Renewable Fuel Standard (RFS) volume mandates.

While the price for oil and gas have come down tremendously in recent years due to the prolific supplies being developed in Pennsylvania and across North America, the costs to refiners to comply with the ethanol mandate have swung wildly, and the pandemic has only exacerbated the problem. As we share with the administration a desire to recover from the pandemic, we request your support for granting this waiver.

In Pennsylvania, Monroe Energy's refinery, in addition to creating hundreds of thousands of barrels of refined product each week to power our nation's economy and its transportation, aviation and logistics industries, has created and supports thousands of good paying, family sustaining jobs in the tristate region. We know this because a 2012 study by the Pennsylvania Department of Labor and Industry was commissioned following the closure of three refineries the year before. This study found the following:

The employment multiplier for these layoffs in southeastern Pennsylvania is substantial. An estimated 18.3 jobs will be lost for each layoff. The employment multipliers in this industry for the state and the nation are 22 jobs and 61 jobs, respectively. In comparison, Iron and Steel Foundries, which has a significant economic tie to several industries, only has a multiplier of 6.5 jobs for Pennsylvania and 12 jobs for the nation.

Since Monroe's inception in 2012, costs to comply with the RFS program have ballooned uncontrollably and unpredictably. Since that time, Monroe has stated publicly it has spent in excess of four times the purchase price of their entire company on RFS compliance costs. This financial pressure is not isolated to Monroe Energy; other refiners in the region have noted similar pressures.

The RFS program sorely needs reformed, if not outright repeal; however, such remedies are a legislative matter for Congress to take up. In the meantime, the administration should use to tools at its disposal to provide relief. I urge you to grant the petition or, at a minimum, put in place cost containment measures to control and significantly reduce the cost of RINs.

For all of these reasons, we support Governor Wolf's petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Barr".

Gene Barr
President and CEO