

August 12, 2021

Michael S. Regan, Administrator United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Dear Administrator Regan:

On behalf of Pennsylvania's chemical manufacturers, I ask that you please consider reforms to the federal Renewable Fuel Standard (RFS). The business of chemistry and associated downstream markets rely on fuels for transportation, power, and feedstock.

Pennsylvania's chemical industry represents \$24 billion in economic activity and more than 80,000 jobs. Our member companies manufacture chemicals and products that rely on numerous raw material providers and our region's refineries serve as some of their most indispensable partners in this respect.

Aside from producing transportation fuels, refineries are also responsible for many of the feedstock ingredients critical to our members' production capabilities. Many of these products are critical to safety during the pandemic, such as N95 masks, which are made from byproducts produced during the refining process. Refineries also play an important role as the starting block for chemical products necessary to achieving President Biden's climate goals. Wind turbines and other components of renewable energy sources, plastic-based building materials, such as insulation and sealants, to improve energy efficiency and reduce energy consumption, and across the transportation industry, plastic parts have reduced vehicle weight, resulting in improved fuel economy and reduced emissions all need raw materials refineries provide.

In the United States, we are fortunate to have abundant and affordable energy resources providing our manufacturing economy a competitive edge in the global market and reducing our reliance on imports. Unfortunately, the RFS has compromised the viability of our domestic refineries, particularly local and independent ones we rely on, such as Monroe Energy in Pennsylvania and PBF Energy's facilities in New Jersey and Delaware. These companies support thousands of family-sustaining jobs, and without reform, they will be forced to close, and we will be forced to rely on imports from countries with less stringent regulations.

PCIC supports a transition to cleaner energy sources, but in a way that encourages investments and innovation in our domestic refineries, instead of bankrupting them. Please respond to Pennsylvania Gov. Tom Wolf and other requests from elected officials to waive the RFS volumes. We ask that you work with stakeholders to develop solutions, such as allowing refiners to purchase fixed waiver credits for the ethanol requirement, so these companies may continue to fuel the business of chemistry.

Sincerely,

Abby Noster, President

Pennsylvania Chemistry Industry Council