



Pennsylvania Manufacturers' Association

September 1, 2021

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
Office of Administrator 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

On behalf of Pennsylvania's manufacturers, we write to urge you to support important reforms to the federal Renewable Fuel Standard (RFS). The current structure of the RFS is threatening American energy independence, while also impacting countless businesses that contract with refineries for goods, services, and an affordable and reliable energy supply.

The federal RFS aims to incorporate more renewables into our domestic fuel supply. It began with eight billion gallons of renewable fuel in 2005, and aims to reach 36 billion gallons in 2022. Unfortunately, the law makes refineries responsible for complying with the requirement, but our few remaining independent refineries can't meet the mandate because biofuel mixing takes place after transportation fuel leaves their refineries. This blatant flaw in the system has not been addressed. Refineries have been left to spend more on meeting the RFS mandate than all other expenses combined, and this is not sustainable.

Pennsylvania's manufacturers are concerned, and the EPA should be, too. We have only four refineries left in the Northeast, down from 12 just over a decade ago. That's a loss of 1.5 million barrels per day, or roughly 70 percent. Manufacturers depend on affordable and reliable energy supply to meet the needs of our vast and complex supply chains and networks. No matter what is being made, manufacturers need energy and energy-based liquids to meet customer demands. At a time when we have realized how fragile our supply chains and distribution networks are because of the COVID-19 pandemic, cyber-terrorism pipeline disruptions, or natural disasters, it should be the priority of the EPA to ensure that our manufacturers, here at home, can ensure full operation.

Without EPA action, the RFS threatens the livelihoods of countless Pennsylvanians whose work depends on the long-term viability of our independent refineries. Thousands of Pennsylvanians rely on these refineries for family sustaining careers. Furthermore, tens of thousands of more depend on the work being done at these refineries, both up and downstream, from this important industry. We believe reforms can be accomplished in a common-sense manner that will protect the administration's goals while also ensuring that our economy can continue to protect jobs and American energy independence.

Respectfully,

David N. Taylor
President & CEO