



July 29, 2025

Public Comment

Proposed Rulemaking: "Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes,"
Docket No: EPA-HQ-OAR-2024-0505

Dear Administrator Zeldin,

On behalf of the Pennsylvania Chemical Industry Council, thank you for the opportunity to provide input on Docket No: EPA-HQ-OAR-2024-0505, concerning the Environmental Protection Agency's proposed 2026 and 2027 Renewable Volume Obligations (RVO) under the Renewable Fuel Standard (RFS) program.

For the past 30 years, PCIC has served as the industry trade group representing Pennsylvania's chemical and plastics manufacturers. We represent 45 member companies that operate or provide support services for manufacturing facilities and employ tens of thousands of workers throughout Pennsylvania. As such, our members have amassed significant knowledge and experience related to how policies impact economic growth, resource procurement and the cost impacts for businesses.

On behalf of the chemical manufacturing industry in the Commonwealth, our organization joins with other industry leaders in calling for crucial reforms to the RFS. While long-term solutions are necessary, in the immediate short term, we respectfully, but urgently, ask the EPA to revise its proposed RVO by reducing the volumes proposed for the next two years to a maximum of 14.2 billion gallons annually.

Our member companies are committed to achieving a better quality of life for all Americans through sound science, technology advancement and innovation. They manufacture products that make life better, from everyday household products to safety items; much of what they create is essential and often taken for granted.

Our manufacturers rely on numerous partners to provide the raw materials needed to make their products, and our region's refineries serve as some of their most indispensable partners in this respect. Aside from the transportation fuels refineries are typically known for, they also produce many of the feedstock inputs that are critical to our members' production capabilities. Petroleum products serve as inputs for numerous sectors, producing lubricants, waxes, solvents, asphalt, and even medical devices

such as pacemakers, MRI machines and prosthetic limbs – all of which could not be made at the necessary volumes without the critical byproducts produced during the refining process.

The potential for our domestic refining sector to further unleash American energy independence and dominance is limitless. Conversely, the consequences of continuing to diminish American refining capabilities are vast. If the administration fails to reform the RFS, our domestic refineries will continue to close, and we will become even more reliant on securing refined products from our adversaries abroad. Conversely, a loss in domestic refining capacity will greatly impact Made in America manufacturing as well.

We all understand the good intentions behind the RFS, but the cost of compliance on refiners now dwarfs nearly all of their other operational costs combined. This is simply unsustainable and jeopardizes numerous independent refineries throughout the country, including Monroe Energy in Pennsylvania and PBF Energy's facilities in New Jersey and Delaware, along with the thousands of family-sustaining jobs that these facilities support. Furthermore, American refineries can produce the refined products our modern society relies on in compliance with stringent environmental regulations and shorter, more secure supply chains.

The most important thing that the EPA can do today is make a reasonable reduction in the proposed ethanol volume mandate to 14.2 billion gallons or less for each of the next two compliance years. Taking this step would reduce the crushing financial burden of RFS compliance without negatively impacting biofuels producers or farmers. This approach also aligns the volumes with the federal government's estimates of how much ethanol can be absorbed into the fuel supply.

Every Pennsylvanian and millions of Americans will be impacted if our domestic refineries continue to close due to the broken RFS program, and the industry leaders we represent will suffer the consequences. This issue goes far beyond the fuel needed to fill our tanks. It's about the indispensable role American refineries play in making everyday life possible.

In closing, PCIC appreciates the opportunity to provide comments and for your consideration of the views of Pennsylvania's chemical, plastics and related industries.

Steven Kratz, President

Pennsylvania Chemical Industry Council