



Philadelphia Building and Construction Trades Council – AFL-CIO

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Submitted through the Federal eRulemaking portal:

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

Subject: Docket ID No. EPA-HQ-OAR-2020-0322

Comments in support of the PA Governor Wolf's May 11, 2020 petition urging the Environmental Protection Agency (EPA) to address severe economic harm by issuing a waiver from Renewable Fuel Standard (RFS) volume mandates

The Philadelphia Building and Construction Trades Council is the umbrella organization for more than 50 member local unions that work in the construction industry in the greater Philadelphia region. Our organization represents tens of thousands of highly skilled workers. Petroleum refining is one of the major industries that our members support in the tristate region. That's why I write today as the Philadelphia Building Trades Business Manager in full support of Pennsylvania Governor Tom Wolf's petition to address severe economic harm by issuing a waiver from Renewable Fuel Standard (RFS) volume mandates.

Philadelphia Building Trades members have built many things in our region. From skyscrapers to major manufacturing complexes, we play an integral role in our region's economic development. We are highly skilled and dedicated workers, but we are also leaders outside of our jobs. Members spend their free time building communities through in-kind contributions of labor and materials, and offer significant financial support to non-profit organizations that help the underprivileged in our area. None of this would be possible without the important work we do to sustain industry in our region.

Monroe and other merchant refiners are under immense financial pressure because of the imbalanced nature of the RFS program. The program is not operating as Congress originally intended, and reform is needed now, before it's too late for these refineries, for our members, and for their families. The pressures created by the current RFS structure also endanger American national and energy security.

In the past 10 years alone, we have seen how refinery closures impact our nation. In our region, this impact is significant. 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.

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We cannot stress enough how crucial these facilities are to the region and the nation. They provide life-changing opportunities for thousands of families, and they supply the refined products that fuel much of the Northeast economy.

Our members, their families, and our entire region rely on the economic activity created by facilities like Monroe. If action is not taken soon on Governor Tom Wolf's petition and meaningful reforms to the RFS are not achieved, we fear that the remaining refineries in our region will be gone forever. The economic impact of such an outcome is unthinkable.

Without a change, our jobs are at risk, our national security is threatened, and the goals of the program will not be met. Therefore, I urge you to grant the petition, or at a minimum, put in place urgently needed cost containment measures to control and significantly reduce the cost of Renewable Identification Numbers.

Thank you for considering our views.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Dougherty". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping tail.

JOHN J. DOUGHERTY
Business Manager