



PLUMBERS AND PIPEFITTERS LOCAL UNION 322

Southern New Jersey AFL-CIO

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February 4, 2022

U.S. EPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue., N.W.
Washington, DC 20460

RE: Comments on Renewable Fuel Standard (RFS) Program
RFS Annual Rules (EPA-HQ-OAR-2021-0324)
RIN 2060-AV11

To Whom It May Concern:

My name is David Bruce and I am the Business Manager for Plumbers & Pipefitters Local 322. I am submitting these comments to respond to the EPA's proposed 2022 Renewable Volume Obligation for conventional renewable fuels and to explain the negative impact this proposal will have on small merchant refiners like PBF Energy in Paulsboro, New Jersey.

The EPA is proposing to set a 2022 Conventional Ethanol Standard that is so high that it negates the benefits of the 2020 and 2021 proposals, therefore, making it unachievable to meet such standards.

I would request that the EPA reduce the Conventional Renewable Fuel mandate to a level that allows small independent refiners to continue to operate and stay competitive in the refining market. If the EPA continues with this unachievable mandate, it would inevitably result in the loss of thousands of good paying union jobs throughout the region.

The PBF refinery in Paulsboro has been in existence since 1917 and has provided generations of families the opportunity to achieve the American dream of a solid middle-class life through hard work and dedication for both white collar and blue-collar workers.

Local 322 as well as the entire Building Trades community has been a part of the safety and success of this refinery since its existence. PBF has provided generations of families with good paying jobs. Jobs that provide a safe working environment, good health benefits and the ability to retire with dignity and still be a productive member of the community and society.

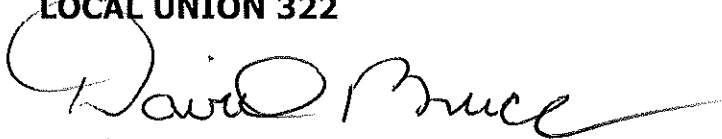
If PBF refinery closes its operation, not only will it result in the loss of so many good paying jobs, it will result in the loss of millions of dollars throughout the local economy and region-negatively impacting many small businesses and hard-working families.

The EPA could help with the survival of this very important refinery by considering lowering the 2022 Conventional Renewable Fuel mandate or by granting small refinery exemptions. The region known as the Delaware Valley has suffered tremendously throughout the decades from loss of our industrial base. The loss of PBF would not only be devastating to Local 322, but the entire region as well.

I thank you for your time and consideration on this critical matter and I urge you to keep the many families that will be impacted in mind when making your decision.

Sincerely,

LOCAL UNION 322

A handwritten signature in black ink that reads "David R. Bruce". The signature is written in a cursive style with a large, looping initial "D".

David R. Bruce
Business Manager

DRB/bls