



STEAMFITTERS LOCAL UNION 420

JAMES SNELL
Business Manager

KEVIN HEFFERNAN
Financial Secretary/Treasurer

February 10, 2021

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**

As the business manager of the Steamfitters Local Union 420 which represents over 4,600 highly skilled craftsmen, I can tell you firsthand that many of my members depend on facilities like Monroe Energy for their livelihoods. Over the years, jobs at our local refineries have provided life-changing opportunities for tens of thousands of steamfitters, many of whom spent their careers working at facilities like Monroe Energy. Refinery jobs have allowed our local union to invest in training, and to reinvest in our communities through youth programs, scholarships, and so much more.

The pandemic has created tremendous challenges for our members as projects across our tristate region were either put on hold or cancelled altogether. Additionally, the RFS program continues to represent an existential threat to facilities like Monroe which in turn threatens our livelihoods and the economic vitality of the region.

Therefore, we are 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.

Forcing Monroe and other merchant refiners to buy high-cost Renewable Identification Numbers (RINs) from integrated refiners, blenders and Wall Street traders is a threat to the facilities in which our members work. As we have seen with the recent bankruptcy and closure of the PES refinery, out of control costs associated with RFS compliance have led to the loss of thousands of regional jobs. Without a change, our jobs are at risk, our national security is threatened, and the goals of the program will not be met.

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 RINs.

Thank you for considering our views.

Sincerely,

Jim Snell
Business Manager, Steamfitters Local Union 420