February 2, 2022

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

RE: Docket ID No. EPA-HQ-OAR-2021-0324

Dear Administrator Regan:

As a long-time Lucas County, Ohio resident, I know first-hand that manufacturing is the prime economic driver for our region. I want to see our manufacturing and agriculture sectors succeed, but the EPA's recently proposed renewable fuel standard (RFS) renewable volume obligation (RVO) rule for 2022 will put our regional fuel supplies at risk and jeopardize high paying jobs while sending consumer fuel costs higher at the same time.

PBF's refinery, located here in the Toledo area, contributes $5.4 billion in economic output to our region and employs about 1,200 people. Estimates show each refining job supports 16 other jobs in the region, and many of the direct employees are union workers. PBF contributes millions of dollars in payroll taxes alone. The Toledo Refinery also provides approximately 15-20% of Ohio and Southeast Michigan's fuel supply, in addition to the majority of regional jet fuel supplies. As you can see, the economic impact of PBF's refinery in Toledo and region as a whole is massive, and is also the major economic driver in a minority-majority area of Toledo.

The astronomical levels that RINs (Renewable Identification Numbers – the tradeable credits refiners need to collect in order to comply with the RFS program) are trading at is an enormous burden on refineries, such as the one in Toledo. RINs have skyrocketed over the last two years, rising more than 2,000% from January 2020 at one point. It is quite unsustainable for independent refiners as this situation has resulted in the costs of RINs being greater than all other operating costs combined.

As a solution, the EPA needs to set a final 2022 RFS RVO ethanol requirement at a level that reflects what the fuel supply can handle. Current estimates project that consumers will buy 138 billion gallons of gasoline this year. With this projection in mind, the maximum amount of ethanol that can likely be blended into the fuel supply given the 10% limitation is 13.8 billion gallons. This figure is 1.2 billion gallons lower than the 15 billion gallon ethanol requirement EPA is proposing for 2022.

As such, the EPA must lower the 15 billion gallon ethanol requirement that was proposed for 2022 down to around 13.5 billion gallons which is a better reflection for the maximum amount of ethanol all engines and infrastructure were built to handle. If such a reduction happens, RINs will drop from the present astronomical levels that they are currently trading at which will provide relief to refineries that desperately need it.

If the EPA fails to take the appropriate actions, we unfortunately face the possibility of lost domestic refining capacity and the economic calamity that will surely come with refinery closures. Such a result would run contrary to the President's commitment to protect union jobs and do everything in the Administration's power to alleviate high gas prices for consumers. It would also make our nation more dependent on foreign fuel imports.

Timothy Monaco