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Refinery Workers Local 234 Chartered 1933

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union

February 4, 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 President of the USW Local 10-234 representing nearly 200 union brothers and sisters at Monroe Energy's refinery in Trainer, Pennsylvania, I'm writing 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.

Our members' jobs, their families and our region rely on the economic vitality of the refinery. As you may be aware, the Pennsylvania Department of Labor conducted a study in 2011 which found that every single refinery job supports 18.3 more jobs in our local community, 22 in Pennsylvania, and over 60 jobs nationwide.

The severe economic harm that was the basis for the Governor's petition is even more severe today. The pandemic has exacerbated the Renewable Identification Numbers (RINs) problem, causing prices to skyrocket even more, creating an untenable economic environment for refiners like Monroe. Things are getting worse, not better.

Forcing Monroe and other merchant refiners to buy high-cost RINs from integrated refiners, blenders and Wall Street traders is a threat our very existence. As we have seen with the recent bankruptcy and closure of the PES refinery, these costs jeopardize the economic vitality and viability of merchant refiners in Pennsylvania, the region and the nation. Simply put, unless something is done, this unsustainable trajectory will lead to even more refinery closures, threatening American jobs and our national security.

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,

Jonas Dauber  
President, United Steel Workers Local Union 10-234