

**Congress of the United States**  
**Washington, DC 20515**

May 17, 2019

The Honorable Andrew Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**RE: Modifications to Fuel Regulations To Provide Flexibility for E15;  
Modifications to RFS RIN Market Regulations**

Dear Administrator Wheeler:

As members of the Congressional Biofuels Caucus, we write to submit comment to the Environmental Protection Agency's (EPA) proposed rulemaking regarding modifications to the Reid Vapor Pressure (RVP) waiver for 15 percent ethanol (E15) and regulatory changes to the Renewable Identification Number (RIN) market. While we applaud the agency's efforts to finalize the rule before this year's summer driving season, we ask that the RVP and RIN market provisions be separated into two rules and incorporate the following remarks.

The biofuels sector drives economic growth, supporting hundreds of thousands of American jobs and economies small and large. In 2018 alone, the ethanol industry directly employed 71,367 Americans who contributed over \$46 billion to the nation's gross domestic product. E15 saves consumers money with prices up to 10 cents cheaper than standard fuel.

**RVP Waiver for E15**

Our farmers, renewable fuels producers, and gasoline retail stations stand to benefit from the adjustment of volatility requirements for E15 during the summer season (June 1 through September 15). We agree that E15 is a substantially similar gasoline to E10 and should be treated as such when granting the one pound per square inch (1-psi) waiver on RVP limitations. This will ease labeling confusion at the pump and extend market opportunities for our agriculture communities that desperately need it.

However, we are concerned that EPA's proposal would create inefficiencies in the marketplace due to unnecessary restrictions on the components that can be used for fuel blending. If E15 meets all applicable environmental standards, EPA should not restrict what blending components are used to make the fuel.

**RIN Market Reform**

The RIN market established by the Renewable Fuel Standard (RFS) in 2005 is an important compliance mechanism in which obligated parties must cover their renewable fuel blending obligations. We support increased transparency in the RIN market to ensure competitiveness and fairness in RIN pricing. However, provisions in EPA's proposed rule will create significant price advantages towards obligated parties that are short on biofuel blending requirements.

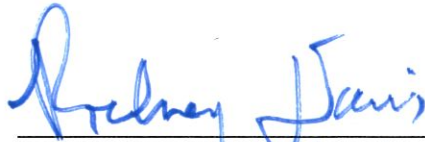
By establishing different compliance periods and RIN retirement requirements for refiners and retailers, the EPA's current proposal penalizes early actors who are bringing biofuels to market and creates a financial advantage for those entities who have been slow to comply with the intent of the law. Any RIN reforms need to further the objectives of the RFS, which is to blend more biofuels, not undermine them. Action must be taken to ensure that the final rule does not tilt the playing field to the benefit of profitable merchant oil refiners at the expense of farmers, biofuels producers, fuel retailers, and rural communities.

Thank you for your consideration of these remarks. We look forward to discussing this with you ahead of this year's driving season.

Sincerely,



COLLIN C. PETERSON  
Member of Congress



RODNEY DAVIS  
Member of Congress



ROGER MARSHALL, M.D.  
Member of Congress



DAVE LOEBSACK  
Member of Congress



DARIN LAHOOD  
Member of Congress



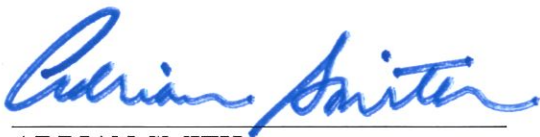
STEVE KING  
Member of Congress



CHERI BUSTOS  
Member of Congress



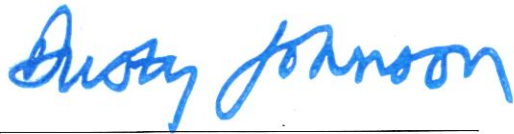
MARK POCAN  
Member of Congress



ADRIAN SMITH  
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DON BACON  
Member of Congress



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DUSTY JOHNSON  
Member of Congress



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CINDY AXNE  
Member of Congress



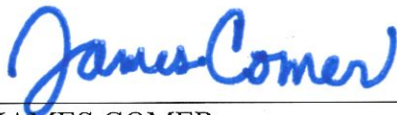
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ANGIE CRAIG  
Member of Congress



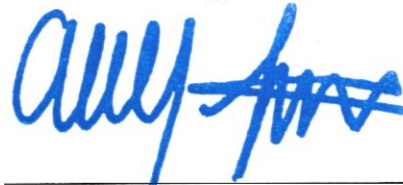
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STEVE WATKINS  
Member of Congress



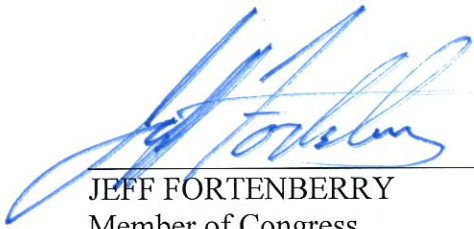
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JAMES COMER  
Member of Congress



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