



Friday, July 26, 2019

Administrator Andrew Wheeler
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington DC 20004

Dear Administrator Wheeler,

It was an honor to help welcome you to the Southwest Iowa Renewable Energy (SIRE) ethanol plant in Council Bluffs, Iowa, in June as hundreds of farmers and ethanol supporters celebrated the finalization of the year-round E15 rulemaking with President Trump.

However, it was unfortunate that you did not have the opportunity to join the President on our tour of the facility. I know President Trump truly appreciated and enjoyed learning more about ethanol, speaking with the plant's workers, hearing from local farmers, and gaining a deeper understanding of just how important a healthy and robust ethanol industry is to rural America.

It is being reported that you are visiting Delta's Monroe Energy oil refinery on Monday, July 29, at the invitation of Sen. Pat Toomey (R-PA). During your visit, you likely will hear the refiners' perspective on the Renewable Fuel Standard (RFS) and they will no doubt encourage you to continue EPA's unprecedented use of small refinery exemptions. Even though Monroe Energy is not a "small refinery," Delta officials will certainly argue that the company has benefited from the waivers because they resulted in a significant collapse in RIN prices. Of course, your agency's own analysis has concluded that the financial health of refineries is not affected by RIN prices, stating that, "...obligated parties, including small entities, are generally recovering the cost of acquiring the credits necessary for compliance with the RFS standards through higher sales prices of the petroleum products they sell. This is true whether they acquire RINs by purchasing renewable fuels with attached RINs or purchase separated RINs."

We, of course, have a decidedly different view than you will hear from Monroe Energy on the impact of these exemptions on the refining sector, farmers, ethanol producers, and consumers. Indeed, the refining industry is doing remarkably well in this economy, and Monroe Energy has reported robust net operating income in recent years (incidentally, Monroe notched record operating income in 2015 when RIN prices were three times higher than current levels). Ethanol producers and farmers on the other hand are suffering under the weight of rising protectionist trade policies across the globe, mother nature's wrath, and demand destruction here at home.

As you were unable to participate in the tour of SIRE in Council Bluffs, I would like to warmly extend an invitation to you to visit an RFA member company's ethanol plant at your earliest convenience. I know you are a fair-minded individual who is looking for the right answers to the policy questions surrounding ethanol and the RFS. I also believe you would benefit greatly from hearing from ethanol plant workers and farmers about the impacts of your agency's decisions on the RFS.

On behalf of the thousands of RFA member company workers and farmers whose livelihoods depend on a strong ethanol industry and stable RFS policy, I look forward to welcoming you to an ethanol plant for a tour and discussion soon.

Sincerely,



Geoff Cooper
President and CEO
Renewable Fuels Association