To: Dravis, Samantha[dravis.samantha@epa.gov]
From: Stephen Ayling
Sent: Tue 5/23/2017 4:25:28 PM
Subject: Help Protect Refiners Jobs-Changing the "Point of Obligation"

Samantha Dravis,

The time is now to help prevent a massive loss of good-paying American jobs. The EPA currently implements the Renewable Fuel Standard in a way that makes all U.S. refiners responsible for ensuring that certain levels of renewable fuels are blended into gasoline, even if they do not have capabilities to do such blending.

This nonsensical set-up allows large integrated oil companies that blend more fuel than they refine and big convenience store gasoline chains (who do much of the blending) to collect valuable credits for the renewable fuel they blend into the pure gasoline they get from refineries. Independent refiners, who do little or no blending themselves, then end up purchasing those credits in order to demonstrate compliance with a process they have little control over. Small and independent refiners are at risk of going offline due to this backwards regulation, with 75,000-150,000 U.S. workers potentially impacted.

Please, help save our jobs and make this right. Please move the point of obligation for the RFS in a way that fixes this inequity.

Thank you.

Stephen Ayling
3003 Stuart Way
Lansdale, Pennsylvania 19446