

Message

From: Block, Molly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=60D0C681A16441A0B4FA16AA2DD4B9C5-BLOCK, MOLL]
Sent: 6/20/2018 1:14:18 PM
To: Ex. 6
CC: Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]
Subject: Re: Farm World -- Hardship Waiver Question

Jordan -

“During last week’s Heartland tour, Administrator Pruitt shared that he believes it is possible to grant the RVP waiver for E15 under the Clean Air Act, and to be effective, would require a subsequent notice and comment rulemaking process.” – Lincoln Ferguson, EPA Spokesperson

“The criteria used to grant waivers has not changed since previous administrations. EPA follows a long-standing, objectively determined process where the Agency uses a Department of Energy analysis to inform decisions about refiner exemptions/waivers, for refineries that are below the statutory threshold. EPA decisions on waivers are based on refinery-specific information over which applicants claim CBI protections.” **EPA spokesperson**

Additional background (not for attribution):

- Any refinery that produces 75,000 barrels or less per day on an annualized basis can apply for the Small Refinery Hardship exemption.
- When first established, the program automatically exempted refineries based solely on their output, which resulted in 59 small refineries being exempted from 2007 to 2010. Post-2010, qualifying refineries seeking a small refinery hardship exemption submit financial information to EPA. EPA then shares this information with DOE and DOE uses a scoring matrix to quantify structural, economic and refinery-specific factors that may contribute to “disproportionate economic hardship.”
- The “formula” for determining hardship is found in the two DOE studies available here: <https://www.epa.gov/renewable-fuel-standard-program/small-refinery-exemption-studies-department-energy>

Sent from my iPhone

On Jun 20, 2018, at 8:25 AM, Daguillard, Robert <Daguillard.Robert@epa.gov> wrote:

Third Floor, will you handle, or should I work with the program?

Cheers, R.

Robert Daguillard
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Ex. 6

From:

Ex. 6

Sent: Tuesday, June 19, 2018 11:46 AM

To: Daguillard, Robert <Daguillard.Robert@epa.gov>

Subject: Farm World -- Hardship Waiver Question

Hi Mr. Daguillard,

My name is Jordan Strickler and I am a freelance writer for Farm World News. I have been covering the RFS hardship waiver news for our paper recently and just had a couple of questions, I was hoping I could have answered.

The first is, what is the formula for deciding a "hardship"? If there is none currently, do you think that there might be a standard in the future? The second is what do you think the chances are that the EPA would allow E-15 year round.

Any help with one or both of those questions would be greatly appreciated.

Thanks!

Jordan Strickler

Ex. 6