Message

From: Whitfield, Peter [pwhitfield@sidley.com]
Sent: 3/6/2025 6:41:51 PM
To: Dominguez, Alexander [dominguez.alexander@epa.gov]
Subject: RFS Compliance Deadline Issue

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Alex,
Just wanted to alert you to an issue a number of my clients are battling re: RFS compliance deadline. As you know, EPA issued a proposed rule to adjust the cellulosic volumes in December and indicated that the Mar. 31 compliance deadline would be extended. Since that proposed rule has not been finalized, a lot of clients are worrying about potential noncompliance if they do not retire RINs by Mar. 31 (and certain of them cannot use the deficit provision because they used it last year). Compounding the issue is that certain contractors/consultants are telling them they will be in violation and have to pay large penalties. If there are assurances your office can provide that the compliance deadline will be extended at some point that would be greatly appreciated, as my clients want to avoid purchasing and retiring RINs unnecessarily only to have to unretire and adjust their compliance in the future. Any help you can offer on this is greatly appreciated. Happy to discuss in more detail if needed.

Thanks,
Peter

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