

January 17, 2019

Administrator Andrew Wheeler
United States Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington DC 20460

Dear Administrator Wheeler,

As you know, allowing year-round sales of E15 is critically important to America's ethanol producers, gasoline retailers, and farmers. Given the dire conditions in the ethanol and grain markets today—driven largely by your predecessor's unprecedented use of small refiner exemptions—the opportunity for increased E15 use represents a vital measure of hope. That is why President Trump's renewed commitment to finalizing the E15 regulatory fix before summer resonated so positively at the American Farm Bureau Federation's event on January 14. It is also why your pledge to complete the E15 rulemaking process before the summer ozone control season was so well received during the January 16 hearing of the Senate Environment and Public Works Committee.

However, finalizing the year-round E15 rulemaking no later than May 31 will take a Herculean effort. The shortest timeframe that any rule related to the Renewable Fuel Standard (RFS) has gone from proposal stage to final promulgation was the 2018 Renewable Volume Obligation (RVO), which took 161 days—and the 2018 RVO rulemaking was relatively simple and straightforward. We believe extending the existing Reid vapor pressure (RVP) volatility tolerance to E15 is also a simple regulatory adjustment. Still, proposing the rule, allowing the public to comment, responding to those comments, preparing a draft final rule, subjecting that draft to interagency review, and ultimately promulgating a final rule will be an extraordinary challenge to complete in the 134 days remaining until May 31.

This already tight timeline is further complicated by the fact that the Agency is intending to also consider new RIN reform initiatives in the same rulemaking package. While we support efforts to bring more transparency to the RIN market, there is no urgency to move forward quickly with RIN reform provisions. This is particularly true as the previous uproar from refiners about "high RIN costs" has been reduced to a murmur as RIN prices have collapsed to historic lows. Unlike E15, there is no deadline by which RIN reform measures must be finalized in order to allow fair and efficient operation of the market.

Therefore, we respectfully request that EPA bifurcate the rulemaking into two separate actions, moving forward immediately on the year-round E15 provisions and considering RIN reform in a subsequent and secondary action. Holding year-round E15 hostage to

RIN reform provisions that are ultimately designed to ease RFS compliance for highly profitable oil companies seems counterintuitive at best, and cynical at worst.

We know the Agency has already done a great deal of work on the year-round E15 provisions, and we certainly appreciate the transparent and cooperative process your staff has engaged in to assure a sound and expeditious rulemaking. The E15 rule must begin moving now if it is to be completed by summer. It must not be delayed by RIN reform provisions for which time is not a factor.

Sincerely,

A handwritten signature in black ink that reads "Geoff Cooper". The signature is written in a cursive, flowing style.

Geoff Cooper
President and CEO
Renewable Fuels Association

Cc: Bill Wehrum
Assistant Administrator for Air and Radiation
Environmental Protection Agency

Francis Brooke
Special Assistant to the President
The White House