



May 3, 2018

Administrator Scott Pruitt  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator Pruitt:

During recent testimony before Congress you noted that under your leadership the EPA has approved several dozen small refinery exemptions from the Renewable Fuel Standard (RFS). It is reported that those exemptions destroyed the demand for well over one billion gallons of corn ethanol. The exemptions also reduce the demand for cellulosic ethanol and other advanced biofuels.

At the same time, we hear from our members that requests for RFS pathway approvals are stalled at EPA, preventing the production of millions of gallons of cellulosic ethanol and their related D3 RINs. Dozens of plants are ready to produce and, in some cases, have been waiting months and months for pathway approvals for proven and commercially successful cellulosic technologies.

Both the volume and expeditious manner in which your EPA has granted demand-destroying RFS exemptions is unparalleled in the history of the EPA and the RFS program. If the same urgency could be brought to bear on pathway approvals, the increase in cellulosic ethanol production could be substantial.

In order to implement the letter and spirit of the law as was promised by President Trump, it is not unreasonable for us to expect that the EPA would devote at least as much effort to process new RFS pathway approvals as to grant highly-questionable, demand-destroying small refinery exemptions for some of the largest oil companies in the world.

As such, we request that you review the EPA's current staffing and workloads in order to prioritize new RFS pathway applications. We suggest that the results to date clearly indicate that the EPA could shift some personnel from working on RFS small refinery exemptions and redirect them to instead focus on RIN-generating pathway approvals. Given the fact that the granting of dozens of RFS small refinery exemptions during a timeframe when new pathway approvals are gathering dust is neither fair nor balanced, it only seems reasonable to expedite this approval process immediately.

We appreciate you looking into this situation and right-sizing the staff working on both of these areas. With the draft 2019 RVO rule surely near completion, it is important that D3 RIN generation not be artificially limited in order to justify unnecessarily large cuts to the cellulosic ethanol RVO.

Sincerely,

Monte Shaw  
Iowa Renewable Fuels  
Association

Troy Bredenkamp  
Renewable Fuels Nebraska

Erik Huschitt  
Wisconsin BioFuels Association

Dana Siefkes-Lewis  
South Dakota Ethanol Producers  
Association

Dave Loos  
Illinois Renewable Fuels  
Association