



August 16, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
EPA Docket Center
Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ATTN: Docket ID No. EPA-HQ-OAR-2018-0167

Submitted Electronically

Re: Renewable Fuel Standard Program: Standards for 2019 and Biomass-Based Diesel Volume for 2020; Proposed rule, 83 Fed. Reg. 32,024 (July 10, 2018)

Dear Acting Administrator Wheeler:

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on Docket ID No. EPA-HQ-OAR-2018-0167 regarding the Renewable Fuel Standard Program: Standards for 2019 and Biomass-Based Diesel Volume for 2020; Proposed rule, 83 Fed. Reg. 32,024. NDFU, the largest general farm organization in North Dakota, represents more than 40,000 farm and ranch families and their energy and agriculture supply cooperatives. NDFU's member developed policy positions have long supported the full implementation of the Renewable Fuel Standard (RFS) program.

The Environmental Protection Agency (EPA) is proposing new volume requirements for cellulosic biofuel, advanced biofuel, and renewable fuel in 2019 and for biomass-based diesel in 2020. The EPA's proposed rule acknowledges the minimum volume requirement of 15-billion-gallons of conventional biofuels and proposes an increase for advanced biofuels. Although NDFU appreciates the maintenance of the 15-billion-gallon minimum volume requirement and the increases for advanced biofuels, the proposed volume requirements for 2019 still fall below the mandate set forth by Congress. NDFU requests the EPA fully implement the RFS as written and dictated by the original Congressional mandate.

Further, the EPA must address RIN market operations and RIN market manipulation. By making the small refinery exemption process more public, it will help reduce RIN price volatility and ensure the EPA's actions are consistent with the statute and intent of Congress. To ensure the applicable volume obligations are being met, the EPA must properly account for the volumes being lost through retroactive grants of small refinery exemptions.



Comments of North Dakota Farmers Union

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It is imperative the RFS program be fully implemented. Family farmers are facing substantial economic hardships and the EPA's failure to fully implement the RFS program increases the financial strain on family farmers. Full implementation of the RFS program can provide a much needed economic boost to family farmers and their communities.

Therefore, NDFU respectfully requests the EPA fully implement the RFS, but at a minimum retain the 15-billion-gallon requirement for conventional biofuels and increase the advanced biofuel volume requirements for 2019. NDFU also requests the EPA stop issuing retroactive small refinery exemptions and that it acts to address the loss of biofuel demand as a result of the increase in small refinery exemptions.

Sincerely,

NORTH DAKOTA FARMERS UNION

A handwritten signature in black ink that reads "Mark Watne".

Mark Watne
President