



August 30, 2019

Administrator Andrew Wheeler
U.S. Environmental Protection Agency
EPA Docket Center, Office of Air and Radiation
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket ID EPA-HQ-OAR-2019-0136

Dear Administrator Wheeler:

The Kentucky Corn Growers Association represents the interests of over 5,000 corn farm families throughout the Commonwealth. We appreciate the opportunity to comment on the proposed rule for the 2020 volumes. Farmers in Kentucky, and throughout the country, are setting upon hard times, largely due to EPA decisions to roll back RVO compliance and obligations in recent years through waivers granted to small refineries in a manner that we believe is inappropriate.

The accumulative effect of these decisions by EPA are revealing dire consequences for the American farmer.

Since inception, the RFS has performed exactly as intended by Congress in improving air quality, reducing consumer costs and bolstering rural economies. President Trump widely acknowledged and celebrated these successes and committed to protecting the integrity of the RFS, but EPA's actions are contrary to those promises, the effect of which is damaging to farmers' livelihoods. The compliance gallons that have been removed from this program, to the measure of 4.04 billion, by exemptions should be restored in the final rule of this RVO. The final rule should:

- Adjust the 2020 RVO percentages to effectively redistribute projected small refinery exemptions.
- Address the court-ordered remand and restore the 500 million gallons missing from the 2016 RVO.
- Lay out a plan for reallocating the renewable fuel blending volumes already lost to small refinery exemptions in the 2016, 2017, and 2018 compliance years.

Thank you for considering our comments, please find the technical portions of NCGA's comments that are attached.

Sincerely,

Mark Roberts, President