



August 31, 2017

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Attention: Docket ID No. EPA-HQ-OAR-2017-0091-0002

Subject: Renewable Fuel Standard Program: Standards for 2018 and Biomass-Based Diesel Volume for 2019

Submitted via Federal Register

The Water Environment Federation (WEF) welcomes the invitation to provide comments on the proposed rule for the Renewable Fuel Standard (RFS) Program: Standards for 2018 and Biomass-Based Diesel Volume for 2019. WEF is a member driven organization representing over 33,000 professionals in the water industry. One of our goals is to work with our membership to help inform legislation affecting our national water community. We were disheartened to find that the EPA has proposed, for the first time, to lower the total renewable fuel targets for the RFS.

Wastewater represents a significant opportunity for energy production as it inherently has more potential energy inside it than it takes to treat it. Some of our innovative members aim to capture and convert this energy into fuels to help run their facilities and reduce costs for their customers. The RFS is a necessary program for our members to have certainty when considering adding these treatment technologies at their facilities. A significant amount of time is spent planning new investments based on the knowledge that the fuel they produce will have a certain value. The RFS guarantees this value and without it, we have heard from our members that new projects will have increased risks and may not be undertaken.

WEF believes that the lowering of the cellulosic and advanced biofuel volume targets in 2018 will directly impact renewable energy production in the water industry. We request that instead the EPA increases the volume targets in 2018 to continue to drive growth in the sector. The RFS is one of the most crucial factors in increased investment in renewable fuels and the

guaranteed demand that they bring directly affects our members ability to continue to drive growth and provide for their customers.

We again thank you for this opportunity and welcome any dialogue or discussion on this matter. We may be reached at (703) 684-2416 or at cternieden@wef.org should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Claudio H. Ternieden". The signature is written in a cursive style with a large, sweeping flourish at the end.

Claudio H. Ternieden
Director, Regulatory Affairs
Water Environment Federation