



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

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Via email: pubcomment-ees.enrd@usdoj.gov

March 20, 2018

Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division
P. O. Box 7611
Washington, D.C. 20044-7611

RE: ***PES Holdings, LLC., et al., D.J. Ref. No. 90-5-2-1-10993/1.***

Dear Assistant Attorney General:

This letter is to express support for the settlement reached between the United States Department of Justice on behalf of the Environmental Protection Agency and Philadelphia Energy Solutions (PES) on a compliance waiver for its RINs obligations. The settlement paves the way for PES' successful emergence from bankruptcy protection while continuing operations; this is critical to the company's ability to save jobs and preserve the energy supply and overall security for the Northeast U.S.

As information, the Maritime Exchange for the Delaware River and Bay is a non-profit trade association dedicated to protecting and promoting the Delaware River commercial maritime industry. PES is a long-standing member of our organization, a valued contributor to the Delaware River regional community, and responsible for a substantial number of family-sustaining and high-skilled jobs.

PES jobs pay an average in the range of \$120,670 per year, supporting local families and helping to sustain the local economy. Were PES to shutter its doors, 1,100 employees would be unemployed, and an additional 500 full time equivalent contractors would find themselves without work. It is fair to estimate that every one of these jobs supports more than 13 others in the Commonwealth of Pennsylvania and 13 jobs in the central Atlantic region. A PES refinery closure can only snowball into even further economic devastation: as a recent study estimated, for every 100 jobs lost at PES, the loss of 1,333 jobs in Pennsylvania and the Pennsylvania economy would follow by up to 14,610 jobs in the first year alone.

In addition to the impact on jobs and the economy, a study conducted by the Energy Information Administration in 2012 stated that closure of the refinery would result in significant impact on energy security, the price of transportation fuels in the Northeast U.S., and critical energy supply reliability and affordability.

On behalf of its nearly 300 members, the Maritime Exchange fully supports the settlement agreement and respectfully urges the Department of Justice on behalf of the Environmental Protection Agency to seek final court approval of the settlement as soon as possible. Please feel free to contact me at 215-925-2615 or at dennis.rochford@maritimedelriv.com with any questions or to request additional information.

Sincerely,

Dennis Rochford
President

cc: Lisa Himber, Vice President