



National Cooperative Refinery Association

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September 19, 2013

The Hon. Gina McCarthy
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Petition for Waiver of 2014 Renewable Fuel Standard

Dear Administrator McCarthy:

National Cooperative Refinery Association (NCRA) respectfully submits this petition to the U.S. Environmental Protection Agency ("EPA") for a partial waiver of the 2014 applicable volumes of the Renewable Fuel Standard ("RFS") pursuant to section 211(o)(7)(A) of the Clean Air Act.^[1]

NCRA is an obligated party pursuant to regulations promulgated by EPA to implement the RFS (40 C.F.R Part 80, Subpart M). NCRA is thus a person subject to the requirements of subsection 211(o) of the Clean Air Act. NCRA also is a member of the American Fuel & Petrochemical Manufacturers ("AFPM"). Existing EPA administrative and judicial precedent makes clear that AFPM has standing to file an RFS waiver petition. Notwithstanding NCRA's submittal incorporates by reference the RFS waiver petition filed by AFPM and the American Petroleum Institute on August 13, 2013.

Respectfully submitted,

Rick K. Leicht
Vice - President Refining

OFFICE OF THE
EXECUTIVE SECRETARIAT

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^[1] See 42 U.S.C. § 7545(o)(7)(A).

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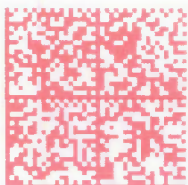


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THE HON. GINA MCCARTHY
ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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WASHINGTON, DC 20460



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