



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 5 2012

OFFICE OF
AIR AND RADIATION

Mr. Craig Stuart-Paul, CEO
Fiberight Blairstown Operating, LLC
P.O. Box 261
Blairstown, Iowa 52209

Dear Mr. Stuart-Paul:

In October 2011, you requested the U.S. Environmental Protection Agency's approval of Fiberight's plan, developed pursuant to 40 CFR 80.1450(b)(1)(viii), to separate recyclables from municipal solid waste (MSW) intended for use as feedstock for renewable fuel production at your biorefinery in Blairstown, Iowa. An addendum to the plan was provided to EPA in February 2012.

Submission of a separation plan is a registration requirement under the Renewable Fuel Standard (RFS) Program regulations established under Clean Air Act Section 211(o) for producers seeking to make qualifying renewable fuel from MSW-derived feedstock. The separation plan must demonstrate ongoing verification that there is separation of recyclable paper, cardboard, plastics, rubber, textiles, metals and glass wastes to the extent reasonably practicable.

The separation plan you submitted describes a fully functional municipal recycling facility (MRF) at the front end of your waste-to-energy plant. Your plan assumes no prior separation of recyclables from the waste delivered to your facility, and indicates the ability to recover and recycle over 70% of inbound waste through various separation processes (shredding, screening, pulping, air and magnetic separation, optical and manual sorting, etc.).

As you are aware, Fiberight's separation plan is the first plan that the EPA has received under the RFS program. The EPA therefore chose to solicit public comment on Fiberight's plan. Copies of your plan and comments received can be found in the public docket (EPA-HQ-OAR-2011-0837). The public comments were generally supportive that your separation plan adequately demonstrates the required separation, but cautioned the EPA about applying Fiberight's approach as an industry standard.

As described in the enclosed technical analysis, it is our judgment that Fiberight's plan provides for ongoing verification of separation of recyclables to the extent reasonably practicable. The EPA therefore finds the separation plan submitted by Fiberight, LLC, for your Blairstown, Iowa facility, satisfies the requirements contained within section 80.1450(b)(1)(viii)(B) of the Code of Federal Regulations. This approval applies uniquely to Fiberight's Separation Plan as provided in October, 2011 and in an

addendum in February, 2012. Any further approvals will be done on a case by case basis, based on individual plans submitted. If you have questions on this action, please contact our lead staff person, Kurt Gustafson, on 202 343-9219.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gina McCarthy", with a stylized, cursive script.

Gina McCarthy
Associate Administrator