



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

OFFICE OF
AIR AND RADIATION

SEP 29 2011

Mr. Stu Lamb
Viesel Fuel, LLC
3100 SE Waaler Street
Stuart, Florida 34997

Dear Mr. Lamb:

You requested a determination of whether the renewable diesel fuel products produced by Viesel Fuel, LLC ("Viesel Process") when using the "Triton Process", as a separate production process at your facility, would qualify as biomass-based diesel and advanced biofuel under the Renewable Fuel Standard Program (RFS2). Specifically, you requested approval of your facility, using the Triton process, using natural gas as a process energy source and feedstocks such as soybean oil, to qualify as biomass-based diesel and advanced biofuel under the Renewable Fuel Standard Program (RFS2).

The "Triton Process" was approved for Biomass-Based Diesel and Advanced Biofuel under the RFS2. The pathway was determined to qualify based on an analysis of soybean oil as a feedstock. However, our approval also covered certain other feedstocks that have been analyzed as part of the RFS2 rule and determined to have lower GHG emissions than soybean oil. These additional feedstocks are:

- Oil from annual cover crops;
- Algal oil;
- Biogenic waste oils/fats/greases;
- Non-food grade corn oil

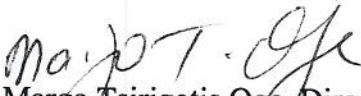
The critical parameters and lifecycle analysis that we conducted for the "Triton Process" are detailed in the Decision Document that is published on the RFS website and can be located at the following link: <http://www.epa.gov/otaq/fuels/renewablefuels/compliancehelp/triton-determination.pdf>.

In your petition, you submitted data and information for the mass balance, energy balance and production process and layout to verify that it is identical to the data and information submitted and approved for the "Triton Process." In addition, you submitted a contract agreement signed by you and Mr. Fred Wilmar, President and CEO of Triton Energy, LLC for the purchase and installation of their proprietary "Triton Process" at your facility. Based on our assessment, we have concluded that the data and information for the mass balance, energy balance and production process and layout are identical to the approved "Triton Process" with one minor difference in the annual hours of operations which when normalized to a Btu per gallon basis does not make a significant impact. Therefore, Viesel is approved to generate advanced biofuel and biomass-based diesel RINs for renewable diesel fuel produced from the "Triton Process" in accordance with specifications in Viesel's petition regarding materials used, fuel produced and process energy sources. This approval applies specifically to Viesel Fuel, LLC. The

appropriate forms and systems will be modified to allow Viesel to register and generate RINs for the production of renewable diesel from the above feedstocks using a production process identified in EMTS as "Viesel Process."

If you have additional questions about this or related issues, please contact Robert Larson of my staff at 734-214-4277.

Sincerely,


Margo Tsirigotis Oge, Director
Office of Transportation and Air Quality