



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

MAR -7 2014

OFFICE OF  
AIR AND RADIATION

Ms. Rita Hardy  
Vice President, Quality and Compliance  
Flint Hills Resources Renewables, LP  
*On behalf of Duonix Beatrice, LP*  
4111 E. 37 Street North  
Wichita, Kansas 67220

Thank you for your interest in the Renewable Fuels Standard (RFS) program. We have reviewed your petition request submitted pursuant to 40 CFR 80.1416, dated November 22, 2013. In this petition, you requested EPA's assessment of the eligibility of Duonix Beatrice's proposal to produce biodiesel from non-food grade corn oil using a transesterification technology similar to the common industry process for producing biodiesel as already approved for certain biodiesel fuel pathways under the RFS program (see Table 1 to 40 CFR 80.1426 for the list of approved biodiesel pathways). In addition to non-food grade corn oil, we also understand that in the future, this source of feedstock might be supplemented with beef tallow and yellow grease. The process you described combines esterification of free fatty acids and transesterification of triglycerides into a single process step that utilizes a solid catalyst process design as developed by Benefuel Inc.

According to the information supplied in your petition, this process technology is sufficiently similar to the approved transesterification technology to be covered by the existing biodiesel transesterification pathways for these feedstocks. Based on the information provided, the existing regulations cover your technology option and a petition for a new fuel pathway is unnecessary. Therefore, you may proceed with the RFS registration process. More information can be found on our website at <http://www.epa.gov/otaq/fuels/renewablefuels/compliancehelp/index.htm>. If you have any additional questions on the petition or registration process, please contact our support line by emailing [support@epamts-support.com](mailto:support@epamts-support.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Karl Simon".

Karl Simon, Director  
Transportation and Climate Division

cc. Philip Guillemete, Flint Hills Resources