

## Churchill, Julie M

---

**From:** Muzzey, Lynn  
**Sent:** Monday, August 08, 2016 3:14 PM  
**To:** Gilbert, Jane; Kennedy, Eric; Cone, Marc A; Churchill, Julie M; Loyzim, Melanie  
**Subject:** FW: Fiberight Update

FYI, please see below for an update on correspondence between EPA and Fiberight on their pending NHSM determination.

---

**From:** Bird, Patrick [mailto:Bird.Patrick@epa.gov]  
**Sent:** Monday, August 08, 2016 3:07 PM  
**To:** Muzzey, Lynn  
**Subject:** FW: Fiberight Update

Lynn,

Please find below the latest correspondence between Fiberight and EPA's Office of Solid Waste. Fiberight has amended their timeframe for providing EPA with additional information.

Patrick Bird  
U.S. EPA - Region 1  
5 Post Office Square, OEP05-2  
Boston, MA 02109-3912  
Phone: 617-918-1287  
Fax: 617-918-0287  
Email: [bird.patrick@epa.gov](mailto:bird.patrick@epa.gov)

---

**From:** McCarthy, Elizabeth  
**Sent:** Thursday, August 04, 2016 2:34 PM  
**To:** Deabay, Elizabeth <[Deabay.Beth@epa.gov](mailto:Deabay.Beth@epa.gov)>; Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)>  
**Subject:** FW: Fiberight Update

FYI.....

*Liz McCarthy*  
OSRR - RCRA Waste Management  
U.S. EPA Region 1  
5 Post Office Square  
Boston, MA 02109  
(617) 918-1447  
[McCarthy.Liz@epa.gov](mailto:McCarthy.Liz@epa.gov)

---

**From:** Miller, Jesse  
**Sent:** Thursday, August 04, 2016 1:28 PM  
**To:** McCarthy, Elizabeth <[McCarthy.Liz@epa.gov](mailto:McCarthy.Liz@epa.gov)>  
**Subject:** Fiberight Update

Liz,

Just wanted to make sure that Region 1 was in the loop.

Basically it will be 2 months before we get our requested information from Fiberight.

Thanks,  
Jesse

---

**From:** Patrick Emerson [<mailto:pemerson@fiberight.com>]  
**Sent:** Friday, July 29, 2016 12:41 PM  
**To:** Miller, Jesse <[Miller.Jesse@epa.gov](mailto:Miller.Jesse@epa.gov)>  
**Cc:** Alan Iantosca <[aiantosca@fiberight.com](mailto:aiantosca@fiberight.com)>  
**Subject:** Re: Follow-up

Jesse,

Thank you for reaching out yesterday. As I mentioned, we hope to have a full, comprehensive response to all of EPA's concerns within about 1.5 to 2 months. We are currently expanding the production capacity of our demonstration plant in Virginia and are not able to produce sample product at the moment. I would like to stress that we are not modifying any of the core elements of our process, we are simply increasing the production capacity and system automations.

Given the inherent relationship between the upcoming data sampling we will be undertaking and the questions surrounding prior submittals, we believe it will be more appropriate to submit our findings and responses in one complete report as opposed to multiple, incongruous responses. We anticipate having a full submittal returned in approximately six to eight weeks.

Thank you for your patience and we look forward to being in touch.

regards,

Patrick Emerson

On 1 Jul, 2016, at 10:15, Miller, Jesse <[Miller.Jesse@epa.gov](mailto:Miller.Jesse@epa.gov)> wrote:

Patrick,

As promised, here is the follow-up list from yesterday's call.

Reach out with any questions.

Thanks,  
Jesse

- Please submit via email the complete process description of the Maine project. If the process description is the same as Marion, then make that very clear.
- Clarify how many different PHS production campaigns have been sampled to date. There's significant variability in the data we've seen, and you indicated during your call that some of these results originated from the same production campaign. Please indicate which ones come from the same production campaigns and the dates the samples were collected.
- Please explain the outlier data issues you have encountered in your analyses to date. What was determined to be the cause of the outlying data?
- Please refer to the PHS as a single name to avoid confusion.

- Has the MSW used in the VA pilot facility been obtained from VA, or was it collected in Maine and shipped down? If not, please explain, in detail, the differences between VA and ME household recycling/waste collection programs. Explain what impacts these differences might have on the planned project in Maine. Explain the MSW composition of both and explain why the data from VA represents MSW from Maine.
- Explain what the PHS will be replacing (coal and/or wood & biomass)
- We see exceedances for lead and antimony. Please provide thoughts on why this occurs.
- There's an order of magnitude difference in Hg and ash content between some earlier-dated samples and the more recent ones, so again, there does not seem to be enough data that reflects the current process available to enable a determination of the PHS as it currently is produced.
- Explain whether the PHS will be burned on-site or off-site. If both, please provide all information. Will the off-site boilers be replacing wood & biomass and coal?
- When new data are submitted, please provide detailed rationale about our concerns on the past submittals. For any upcoming sampling, please use standard sampling and analysis methods, such as those in SW-846 or ASTM methods, and an accredited laboratory. To address observed variability in past tests, please perform a more robust sampling and analysis program, complete with duplicate sampling and analyses, along with QC samples to determine the inter and intra sample variability for the batch sampled as well as laboratory precision and accuracy. Complete laboratory reports and QC reports should be provided, in addition to the description of the sampling techniques used to collect samples. The analyses should cover all analytes for the comparable traditional fuel(s), plus ash, moisture and heat content.
- The recent data show ash content is above 15% both on as-received and dry basis. Fiberright claimed during the call that the as-received (which we assume would be the as-fired) ash content is below 15%. Please explain how the data demonstrate less than 15% ash content.