



July 22, 2016

George Faison
U.S. Environmental Protection Agency
OSWER, ORCR
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Washington, DC 20460

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Re: Change of Company Name – Non-Hazardous Secondary Material Determination
Regarding ReEngineered Feedstock

Dear Mr. Faison:

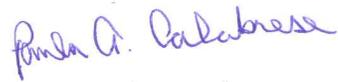
On August 24, 2012, the Environmental Protection Agency (EPA)'s Office of Solid Waste and Emergency Response issued a Non-Hazardous Secondary Material ("NHSM Letter") to ReCommunity, Inc. confirming that ReEngineered Feedstock produced under the supplied specifications would qualify as non-waste fuel under 40 C.F.R. part 241. As you may recall, we met and corresponded with you on several occasions in 2011 through 2012 along with Claudia O'Brien from Latham & Watkins.

On August 5, 2013, ReCommunity Inc. and its affiliates spun off a new company, MPH Energy LLC, later to be renamed Accordant Energy, LLC ("Accordant") for the purpose of developing and supporting the use of ReEngineered Feedstock products in the field. As Accordant continues to own the intellectual property related to ReEngineered Feedstock, we request that you replace references to ReCommunity, Inc. with Accordant Energy, LLC in your record, including on your website and elsewhere. Accordant remains deeply committed to ensuring that manufactured ReEngineered Feedstock will meet the processing definition under 40 C.F.R. § 241.2 and the legitimacy criteria under 40 C.F.R. § 241.3(d)(1) and, as result, ReEngineered Feedstock will continue to be considered a non-waste fuel product pursuant to 40 C.F.R. § 241.3(b)(4).

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We thank you in advance for your assistance with this request. Please let me know if you require additional information.

Sincerely,



Paula A. Calabrese
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Cc: Claudia O'Brien, Esq.