



INTERNATIONAL PAPER PRODUCTS CORPORATION

Manufacturing Biomass Fuel and Recycling Materials

98 Sgt TM Dion Way
Westfield, MA 01085

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International Paper Products Corporation (IPP) of Westfield, MA welcomes this opportunity to comment on the Regional Greenhouse Gas Initiative (RGGI).

IPP is in support of efforts which create incentives for the use of biomass fuels for energy generation, especially when the biomass is co-fired with fossil fuels. The current definition of biomass within the Draft Model Rule should be modified to reflect marketplace factors and technology developments. Specifically, manufacturing a biomass fuel from "pre-sorted", non-recyclable materials which would otherwise be landfilled (thus contributing to Greenhouse Gas generation) and providing the technology to "fire" that fuel at high volumes, efficiently and cleanly in a combustion furnace reflect marketplace realities that can be used today to create real Greenhouse Gas emission avoidance.

Biomass - Definition

We urge the RGGI Staff Working Group (SWG) to consider adding to the definition of "Biomass" an allowance for manufactured or pre-engineered fuels with a cellulosic content (as in IPP's Enviro-Fuelcubes). There are sound legal reasons for the RGGI SWG to consider this request. IPP submits that fuel manufactured from non-recyclable paper, cellulose, rayon, or other related biomass material feedstock (not derived from Construction and Demolition - C&D sources), which can be approved for use as a solid fuel in permitted facilities of representative states, and which is also zero mercury, low sulfur, low chlorine, low heavy metal composition should be included for credit as Eligible Biomass. Each ton of fuel manufactured from this non-recyclable biomass feedstock and burned for energy is a ton of landfill capacity avoided and creates a "double net" benefit for Greenhouse Gas reductions by not becoming a substrate for Greenhouse Gas formation.

The term "biomass" is defined broadly as a matter of federal law. See Section 45 of the Internal Revenue Code (biomass defined as "any solid, non-hazardous cellulosic waste material which is segregated from other waste materials" *not* including "paper which is commonly recycled."); 42 USC Section 8802 (biomass defined as "any organic matter which is available on a renewable basis, including agricultural crops and agricultural wastes and residues, wood and wood wastes and residues, animal wastes, municipal wastes, and aquatic plants.").

In the case of the Massachusetts Department of Energy Resources (MADOER) Renewable Energy Portfolio Standard (RPS), the statutory basis is the **Restructuring Act**, specifically **Section 11F of Chapter 25A**. The **Act** defines a "renewable energy generating source" to include "low emission, advanced *biomass* power conversion technologies, *such as gasification using such biomass fuels as...organic refuse-derived fuel.*" Chapter 25A, Section 11F(b) (emphasis added). Nothing in the **Act** suggests that the list of fuels encompassed therein is meant to be exhaustive.

When the MADOER adopted the RPS, it provided a definition of "eligible biomass fuel" and limited the universe of qualifying fuel. Based on that definition, IPP's fuel would be considered "organic refuse-derived fuel." Since adoption of that rule, the MADEP and MADOER have broadly defined the term "organic refuse-derived" to include "non-organic" components without attempting to quantify the portion that is "non-organic" and without deeming such percentage to be considered "ineligible" and thus subject to the co-firing provision of 225 CMR 14.05(3).

IPP has been informed by the MADOER, that pending review of a formal request, the MADOER would be likely to rule that fifty percent of our manufactured fuel product conforms to their "Eligible Biomass" definition.

Biomass Co-Firing or Sole Firing

By expanding the Biomass definition to include manufactured fuels from non-recyclable papers, the RGGI and participating states create an excellent opportunity to divert an enormous source of energy from landfills and incinerators. When this fuel is processed and fired using the appropriate technology, emissions benefits are seen and net heat rates are not compromised. IPP has spent over 8 years developing and patenting its "Dedensification and Delivery Unit (DDU)" technology which is designed to fire any solid biomass fuel into a co-fired or sole-fired combustion unit using minimal amounts of transportation air. Because the amount of air used to transport the fuel is so low in comparison to existing solid biomass firing technology, the combustion unit does not have to compromise on energy output in order to make use of biomass fuel.

Thank you for your consideration of our comments.

Sincerely,

International Paper Products Corporation

Mark A. Dupuis, President