

# North Pacific Paper Company LLC (NORPAC)

July 14, 2022  
Joshua Grice  
Washington Department of Ecology  
Air Quality Program  
P.O. Box 47600  
Olympia, WA 98504-7600

Dear Mr. Grice:

We are writing to provide commentary regarding the Climate Commitment Act proposed rules being considered by the Washington State Department of Ecology.

North Pacific Paper Company (NORPAC) is based in Longview, Washington. We are currently in the commissioning phase of a significant capital expenditure for a state-of-the-art recycle fiber pulper project. This project will redirect wastepaper (old-corrugated containers (OCC) and mixed paper) from landfills to our mill, where we turn this wastepaper into high quality, recycled packaging papers for corrugated boxes and grocery bags.

With this new equipment, NORPAC will dramatically increase the amount of wastepaper diverted from landfills. In 2021, NORPAC consumed over 200,000 tons of wastepaper. In 2023, with the new pulper online, NORPAC expects to consume a significant amount of additional wastepaper. When our new recycled fiber pulper is operating at full capacity, NORPAC will be one of the largest reclaimers of wastepaper in the United States.

By keeping hundreds of thousands of tons of wastepaper out of regional landfills through the recycling process, we are substantially reducing methane greenhouse gasses from being emitted into the atmosphere. We believe this should be recognized through the granting of credits to offset other carbon emissions.

As the Department of Ecology makes final decisions on the Climate Commitment Act, NORPAC requests consideration to include projects such as our current recycle pulper project as offset credits toward our compliance obligations. This project and the impact it will have on diverting wastepaper from landfills is real, permanent, quantifiable, verifiable, and incremental.

We request that offsets for the purpose of methane gas reduction through paper recycling be included in the discussion and the rulemaking process the Department of Ecology is currently adjudicating.

Sincerely,

Craig Anneberg Tom Crowley Rob Buckingham  
CEO Co-President Co-President

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