



University of North Carolina
Energy Services
925 Branch Street
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To Whom It May Concern:

In response to the recent inquiries regarding Convergen Energy's renewable engineered fuel pellets we would like to provide the following information:

Past Emissions Testing. Convergen Energy's fuel has been permitted in dozens of facilities. As part of this process, Convergen Energy, with the permission of its customers, has shared the most recent stack test data conducted at facilities using Convergen Energy fuel. These facilities include state universities with both stoker and circulating fluidized bed boilers. Additionally, Convergen has shared the third-party lifecycle analysis which was conducted on Convergen's fuel. The analysis found that Convergen fuel represented a reduction in global warming potential ("GWP") in all baseload power generation scenarios with the only exceptions being those that incorporated hydropower and nuclear power. The use of Convergen fuel was shown to reduce GWP as much as 73% depending on the baseline comparison.¹

Selection of Materials. Convergen Energy processes a wide range of pre-consumer industrial by-products. These products are consistently produced within defined specifications and include by-products from the paper, packaging, labeling, and plastic industries. These materials include label and pressure-sensitive materials, paper products, films, poly laminated materials, packaging materials, waxed corrugated materials, and non-wovens. All of the materials are clean, low in moisture, and are non-recyclable.

Critically, all materials are screened prior to being accepted. Materials which Convergen will NOT accept include, but are not limited to: municipal solid waste ("MSW"), post-consumer waste, trash, powdered materials, organic waste, and materials high in contaminants, especially chlorinates, such as vinyl and PVC / PVDC.

Convergen screens all materials from suppliers prior to approving for acceptance. The process for approval begins with the supplier providing material specifications and photographs to Convergen. Upon meeting the specification and visual requirements the supplier must send Convergen a small sample for laboratory testing. If the material meets the required specifications from the laboratory testing Convergen will approve of a truckload to be sent and tested within the Convergen production process. If the material meets all of the requirements, it will be approved for regular shipments. Convergen performs bi-hourly quality tests on its production and sends out regular samples for third-party laboratory quality testing. Critically, Convergen maintains a direct relationship with its raw material suppliers. The materials that Convergen receives are regularly and reliably produced and would otherwise go to landfill.

Testing. Convergen Energy renewable fuel pellets adhere to strict quality specifications. Convergen fuel is high in energy content (between 11,200 and 11,800 Btu / lb) while low in contaminants, which make it a beneficial supplement or replacement fuel for coal and solid fuel boilers. Convergen has demonstrated consistent quality since

¹ See Zemen, Jeff et al., Comparative Life Cycle Assessment of Engineered Fuel Pellets: In Accordance with ISO 14040 and 14044. True North Collective Sustainability Consulting. August 2021.



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its start over fifteen years ago. Convergen's customers have strict emissions requirements dictated by their air permits, which in turn means Convergen must adhere to its quality specifications. To maintain quality, Convergen regularly performs multiple forms of quality testing. In addition to the testing that is performed at the customer's facility, Convergen performs bi-hourly quality tests in-house, which test for energy content and for the contaminant chlorine. Additionally, Convergen sends out regular samples for third-party laboratory testing which also tests for energy content and chlorine as well as other elements. Finally, Convergen has third-party proximate and ultimate analysis tests performed quarterly on its product.

Convergen greatly appreciates the interest in its product and is willing to provide additional information as needed.

Best Regards,

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