

Susquehanna Co-Gen  
Annual report of Fuel Burned

YEAR	TONS TREATED WOOD BURNED	
1988		
1989	89,281	
1990	82,038	
1991	77,000	EST
1992	116,000	EST
1993	89,000	EST
1994	89,500	EST
1995	103,423	
1996	76,000	EST
1997	98,720	
1998	97,444	
1999	76,611	
2000	110,013	
2001	122,288	
2002	113,198	
2003	111,699	
2004	114,470	
2005	116,447	
2006	116,052	
2007	118,231	
2008	93,861	
2009	99,741	
2010	94,688	
2011	72,770	YTD
<b>TOTAL</b>	<b>2,278,475</b>	<b>Tons burned</b>

Statement of William R. Sheeler

I, William R. Sheeler, make the following statement in support of the petition of the Treated Wood Council for a determination that non-hazardous secondary treated wood biomass materials, as described in that petition, are not a solid waste when used as fuel in a combustion unit.

1. I am the Business Manager for Zwicky Processing & Recycling, Inc., a family-owned biofuel processing and recycling facility located in Fleetwood, PA. Our company has operated since 1952.

2. Zwicky's facility was built for processing non-hazardous secondary treated wood biomass, along with construction and demolition debris. These reclaimed materials are combined and ground to provide a combustion material used by cement plants, paper mills, and electricity generators.

3. As an example of the current scale of Zwicky's operations, its facility processed 140,000 tons of non-hazardous secondary biomass during the first ten months of 2012.

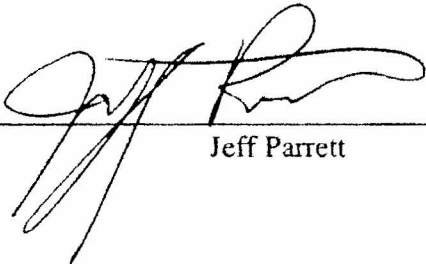
  
William R. Sheeler



March 26, 2013

**STATEMENT OF JEFF PARRETT**

1. My name is Jeff Parrett. I make the following statement in support of the petition of the Treated Wood Council for a determination that non-hazardous secondary treated wood biomass materials, as described in that petition, are not a solid waste when used as a fuel in a combustion unit.
2. My title is vice president of Wheeler Lumber, L.L.C. In the course of my work spanning 26 years in the wood treating business, I have gained familiarity with various types of wood products used as railroad ties, utility poles and bridge timbers then beneficially reused as a valuable commodity fuel.
3. While creosote treated wood products are the best known types used for railroad ties and reused for energy production, I am also familiar with copper Naphthenate treated wood products, and dual treatments using creosote with borate and copper Naphthenate with borate, that are used the same way. Copper Naphthenate has been used off and on since the early 1900s but usage became a commercial proposition during World War II, when it was applied to railroad ties in conjunction with creosote due to creosote shortage. Copper Naphthenate has also been used for many years for utility poles, railroad ties and bridge timbers treated and sold by Wheeler Lumber and have more recently found a growing market acceptance as a treatment product on its own or with borate for railroad ties. Wheeler Lumber currently specifies, and treats with Copper Naphthenate for the state of New York, many other state DOTs, USFS, Railroads, along with many other customers nationwide.
4. Like other forms of treated wood such as those using creosote, copper Naphthenate treated wood ties are desirable as a fuel to electricity generators and others because of these materials' high BTU value, attractive economics, and superior greenhouse gas characteristics compared to fossil fuel that would otherwise be burned for energy generation if these valued secondary materials were not available. One example of which I am aware is the DTE plant in Wisconsin, which is permitted to burn copper Naphthenate, borate, and creosote treated wood secondary materials.



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Jeff Parrett

Dated: March 26, 2013

12127 Whitewood Service Road, Whitewood, SD 57793  
Web Address: [www.wheeler-con.com](http://www.wheeler-con.com)  
E-Mail: [info@wheeler-con.com](mailto:info@wheeler-con.com)

Phone: (605)269-2215  
Toll Free: (800)843-8304  
Fax: (605)269-2497