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EPA Docket Center
Environmental Protection Agency
Mailcode 2822T,
1200 Pennsylvania Ave., NW.,
Washington, DC 20460

RE: Comments on Proposed Area Sources Boilers Rules, Docket ID Number EPA-HQ-OAR-2008-0790, United States Environmental Protection Agency

The Biomass Thermal Energy Council (BTEC) appreciates the opportunity to submit comments on the U.S. Environmental Protection Agency's (EPA) Proposed Rule for Area Source Boilers, Docket ID Number EPA-HQ-OAR-2008-0790. BTEC is a nationwide industry association representing the views of biomass feedstock producers, fuel refiners, appliance manufacturers, vendors, non-profits, and end users. Through consumer education and industry outreach, BTEC seeks to advance the market for biomass thermal energy and promote the use of high efficiency products and locally produced renewable biomass.

Biomass thermal energy today is a growing industry. According to U.S. Census and EPA estimates, approximately 12 million American businesses, citizens, and institutions use biomass to meet their primary or secondary space heating, cooling, or process heat needs. BTEC supports the EPA efforts in setting emission standards for biomass boilers that push the industry to produce cleaner-burning, high-efficiency appliances without discouraging the use of this renewable resource through impractical limits and high compliance costs.

For these reasons, BTEC would like to thank the EPA for responding to industry concerns throughout the rulemaking process beginning in June 2010, and ultimately reconsidering the final rules which were published on March 21st, 2011. The reconsideration notably adjusted emission limits to meet real-world boiler performance, included additional subcategories for biomass boilers, and reduced compliance costs for small businesses and communities through implementation of work practice standards. BTEC believes that the re-proposed standards ensure air quality through a combination of best practices and rigorous emission limits without placing undue burden on boiler manufacturers and operators.

EMISSIONS CONSIDERATIONS

In order to further advance the biomass thermal industry toward cleaner and increasingly efficient technologies, BTEC recommends that the EPA consider applying Particulate Matter (PM) limits on small Area Source boilers (<10 mmBtu/hr) and Carbon Monoxide (CO) limits towards all Area Source biomass combustion equipment rather than a broad application of Work Practice Standards. Without established reasonable clean standards, there will be no incentive for owners to select higher efficiency and cleaner boiler technologies that protect our environment and health. Also, states may proactively implement

competing—and varied—emissions limits that could impede national boiler sales. Many boiler manufacturers and end users have already invested in highly efficient combustion and advanced emissions control technologies for biomass boilers, developing cutting-edge products and advancing the industry. National PM and CO controls will serve to drive the collective industry to meet achievable standards and continue progress towards ever cleaner equipment. Ultimately, these standards will accelerate installation of best performing equipment, reducing emissions and further establish biomass thermal as an affordable, reliable, and renewable energy pathway.

BTEC's proposed biomass boiler emissions limits were calculated using EPA's boiler data set originally published on June 4, 2010.[1] The average CO of the six boilers with the lowest PM emissions and calculating the average PM of the eight boilers with the lowest CO were used in determining the minimum emissions limits.[2] BTEC is confident that its proposed alternative standards and requirements move towards a common-sense balance between significantly reducing emissions from new biomass boilers as well as fostering a strong renewable biomass thermal sector. Based on this approach, the initial and interim recommended limits and practices include:

- CO – 1,164ppm at 7% O2, for all boilers (Method 10);
- PM - 0.23 lbs/MMBtu, for boilers under 10 mmBtu/hr input (Method 5);
- Initial independent third party certification test for biomass boilers to prove compliance at the factory. Once a boiler (or range of boilers) is tested, that boiler would be approved for installation until a change was made in the boiler design;
- Work practice standard for biomass boilers, consisting of an annual boiler tune-up according to manufacturers' specifications.

These recommendations are a starting point for reducing EPA's intended Hazardous Air Pollutants (HAPs) and other emissions; EPA should continue to gather more inclusive, accurate data on biomass fuels, sizes, and technologies before moving forward on increasingly restrictive limits. BTEC recognizes that as an industry, it is a partner in improving air quality and environmental sustainability of energy, and so the organization advocates a ratcheting down of data driven emissions limits over a sensible time period. Such a path could involve biennial reduction goals beginning with the above limits, and then decreasing in a tiered approach based on the data generated from boilers tested in compliance with the new Area Source Boiler Rule. The final regulatory product would allow the marketplace to develop financially feasible emissions control options and limit potentially confusing state and regional balkanized biomass boilers regulations.

Combined with the suggested limits above, initial emissions testing at the factory and work practice standards for maintenance of systems in the field will ensure that clean-burning boilers are installed and that they consistently achieve high emission standards. BTEC believes that superior emission performance can be best achieved and be cost effective over the long-term with on-site tune-ups rather than onerous annual emission testing requirements for boiler owners. Therefore, BTEC supports the proposed biennial tune-up of boilers to meet manufacturers' specifications.

[1] BTEC's proposed emissions limits calculations were submitted to EPA on July 20, 2010 in response to Docket ID No. EPA–HQ–OAR–2006–0790 and can be accessed at http://www.biomassthermal.org/pdf/BTEC_Boiler_MACT_Comments.pdf

[2] These limits also correspond to the European EN303-5 Standards for commercial-scale biomass boilers, further underlining the reasonableness of the proposed limits

CLOSING REMARKS

Biomass boiler vendors and manufacturers are partners in the nation's clean energy future. This industry has tremendous potential to grow, innovate, and support local community energy independence and greenhouse gas reductions through the displacement of fossil heating fuels. Achievable and responsible emissions limits that both improve air quality and encourage improvements in efficiency will foster an environment providing for expansion of renewable heating options. Again, BTEC would like to thank the EPA for both its commitment to cleaner air and its responsiveness to industry concerns. The reconsidered proposal, with the consideration of the BTEC's suggested emissions limits, would provide heath and environmental benefits in our communities and ensure that the biomass thermal industry continues to develop as a clean, renewable source of energy.