

Testimony from the Biomass Thermal Energy Council on the U.S. Environmental Protection Agency's Wood Heater New Source Performance Standard

February 26, 2014

I'm Joseph Seymour, Executive Director of the non-profit Biomass Thermal Energy Council (BTEC), and I thank you for the opportunity to provide comments on the U.S. Environmental Protection Agency's proposed regulations for new residential biomass heating systems. BTEC is a nationwide industry association representing the views of biomass feedstock producers, fuel refiners, appliance manufacturers, vendors, non-profits, state energy and environmental offices, and end users.

The EPA's proposed rule presents a significant update from the first iteration in the late 1980s: during that time, manufacturers both domestically and abroad have introduced advanced and efficient biomass heating technologies that dramatically reduce residential energy expenditures. This proliferation of new technologies has also seen consumers reap the additional benefits of reduced emissions and ease of operation. From 2000 to 2010, wood and pellet home heating grew by 34%, faster than any of the other heating fuels, including solar and natural gas: residential renewable energy consumption is climbing, and wood is a preferred choice for many consumers.

BTEC seeks to advance the market for biomass thermal energy and promote the use of high-efficiency, clean-burning equipment and sustainably harvested biomass. BTEC's view is that there is a need for appropriate emission standards and air quality rules that achieve the following goals:

- Achieve improved air quality both locally and globally (through reduced greenhouse gas emissions);
- Help consumers evaluate the efficiency and emissions performance of heating technologies when making a purchasing decision;
- Support efficient use of a locally-available, cost-effective renewable energy source that displaces fossil fuels;
- Provides manufacturers of heating equipment with clear direction and a reasonable timeframe to improve existing heating technology designs that achieve the above goals.

Our industry acknowledges that despite great advances in clean burning biomass heating technology, there are some legacy wood heating systems installed which are operated poorly and create excessive smoke and generate misconceptions about the biomass heating industry. In moving to introduce cleaner technology and user-friendly designs, it is important that the heating equipment manufacturing industry has a reasonable timeframe to appropriately respond with new designs without incurring excessive costs for testing and certification. A NSPS standard needs to have a reasonable cost of implementation so that it does not create a perverse incentive for owners of existing inefficient heating systems to keep operating them because newer, cleaner systems have become too expensive for those customers to purchase.

We appreciate the EPA's challenge in developing a new NSPS standard due to changing boiler technologies and the lack of an existing single comprehensive standard for equipment testing and performance. As each method of equipment testing can create a significantly different emissions profile for a piece of equipment depending on the appliance's intrinsic design, how it is installed, and how it is operated, we appreciate the challenge of creating a single emission rate number (in lbs/MMBtu) that will define "clean" heating equipment performance. In the coming months we expect to provide a recommendation for a test method and emission limit that balances the environmental and public health goals which balances the technical and economic realities of the existing wood heating appliance market for consumers and manufacturers.

In closing, I urge EPA to consider the potential consequences—negative and positive—of the proposed NSPS rule. Given certainty of test methods and achievable compliance steps, manufacturers will produce clean, efficient thermal technologies that will save consumers money, contribute towards cleaner air, and reduce our reliance on fossil fuels. However, unclear rules will impede research and development, slowing this market's growth and reducing the jobs and rural wealth that come from it.

Thank you for the opportunity to provide comments.

Respectfully submitted,

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