

June 11, 2013

Husain Waheed  
Maryland Department of the Environment  
Air and Radiation Management Administration  
1800 Washington Boulevard  
Baltimore, MD 21230  
(410) 537-3238

**RE: Comments on draft air quality regulations for commercial biomass systems**

Dear Mr. Waheed,

The Biomass Thermal Energy Council (BTEC) thanks you for the opportunity to provide comments on the draft regulations for small-scale biomass combustion systems in Maryland. 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 equipment and locally produced renewable biomass. BTEC has reviewed the draft regulations and has the following comments.

- Regarding the PM limits established under .12, D. for systems between 1 and 10 mmBtu (input) and the large gap between PM limits above and below 1 mmBtu/hr (input) (.12, D. and .12, E.): The limits under .12, D. as set at 0.1 and 0.03 lbs/mmBtu (input) will require significant investment in emission controls for project owners beyond what is typically considered Best Available Control Technology. Particularly at the low end of this size range, the additional control technologies to meet these limits could move the potential projects out of the realm of economic feasibility. Additionally, given the large spread between the emission limitations for systems immediately below (.12, E.) and above (.12, D.) 1 mmBtu/hr (input), these stringent limitations will likely have the unintended consequence of driving some owners to put in two or more smaller units with higher emissions (.12, E.) instead of one larger unit with costly emission controls (.12, D.). BTEC's recommended value for total particulate matter (condensable and filterable) for systems below 10 mmBtu/hr (input) is 0.23 lbs/mmBtu as previously stated in our letter to MDE dated March 29, 2013. BTEC maintains this is an attainable value for systems under 10 mmBtu/hr (input) that combined with 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.
- Regarding test methods for emission testing for equipment under 10 mmBtu/hr (input) (equipment identified in .12, D. & E.): BTEC recommends that the EPA test methods be called out specifically by name. Additionally, BTEC recommends that provisions should be made to allow MDE the discretion to accept emission test results obtained through testing with methods other than those adopted by EPA as long as the methods are determined by MDE to provide equivalent test values.

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BTEC greatly appreciates MDE's willingness to engage biomass stakeholders in the development of the new air quality standards, and thanks MDE for the chance to comment on the rule. 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. BTEC would again like to thank MDE for both its commitment to cleaner air and its willingness to engage the industry.

Sincerely,  
Biomass Thermal Energy Council



Daniel A. Wilson, PE  
Chairman

CC:

Jonathan Kays – University of Maryland Extension

Dan Rider – Maryland Department of Natural Resources – Forest Service

David Dungate – BTEC Technical and Regulatory Affairs Committee

Joseph Seymour – BTEC Executive Director