



1211 Connecticut Ave NW, Suite 600 • Washington, DC 20036-2701
202-596-3974 tel • 202-223-5537 fax • www.biomassthermal.org

November 8, 2012

Ms. Kristien Knapp
Office of Transportation and Air Quality
Mail Code: 6405J
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW. 20460

Re: Docket ID No. EPA-HQ-OAR-2012-0223

Dear Ms. Knapp:

As the Agency finalizes its amended definition of “heating oil” in the Renewable Fuel Standard (RFS), the Biomass Thermal Energy Council (BTEC) urges EPA to consider recognition of solid biomass fuel as a tool to advance the underlying policy goal of the RFS—displacement of liquid fossil fuels. BTEC is an association of biomass fuel producers, appliance manufacturers, supply chain companies and non-profit organizations that view biomass thermal energy as a renewable, responsible, clean and energy-efficient pathway to meeting America’s energy needs. BTEC engages in research, education and public advocacy for the fast growing industry of biomass thermal energy.

While the desired outcomes of the RFS mandate—increased energy independence, reduced carbon emissions, and “green” jobs and economic opportunities for American workers—have our full support, the narrow focus on liquid transportation fuels fundamentally misses the mark. For example, in the Northeastern states, the best and most cost-effective way to achieve the desired outcomes of the RFS is to reduce reliance on #2 heating oil by substituting with locally produced biofuels, including solid biofuels made from biomass. With this strategy, the Northeast (and Western and Midwestern regions, too) will make significant contributions to achieving the desired outcomes of the RFS in ways that make sense for the economy, communities, and forest and farm landscapes of the region.

The Northeast provides the clearest example for why EPA should consider expanding the scope of the RFS to include solid biomass; consumers there use 84 percent of the entire U.S. supply of home heating oil. The region consumes 5.5 billion gallons of heating oil each year (which, according to the Energy Information Administration) is more than all diesel fuel consumed for transportation in the region), sending almost \$10 billion overseas to foreign nations. Rather than producing 423 million gallons of new biofuel—the target set out for the Northeast in the U.S. Department of Agriculture’s Biofuels Strategy—this region can reduce its heating oil consumption by 1.14 billion gallons annually by converting 25% of our thermal energy generation from oil to woody and non-woody biomass and other renewables. A strategy to achieve this goal is already in place, can be implemented with existing commercial technology, and will require no significant new infrastructure, which starkly contrasts to the complexity and expense of creating a liquid biofuels infrastructure where none currently exists.

As the Agency looks to expand the scope of renewable fuels that can generate Renewable Identification Numbers (RINs) through this rulemaking, we wanted to take the opportunity to express BTEC’s support for qualifying solid biomass fuel as a compliance option under the RFS. We believe that taking advantage of renewable energy technologies and capacity that is already in place as a means of advancing RFS goals makes good policy and economic sense.

Thank you for your consideration of our comments and please do not hesitate to contact us with questions.

Contacts: Joseph Seymour, Executive Director, 202/596-3974, ext. 302
Patrick Rita, Government Affairs Representative, 202/261-1324