



**BTEC Comments to the Maryland State Air Quality Control Advisory Council Meeting in Support of  
Updated Commercial Biomass Boiler Emissions Regulations**

*January 31, 2014*

"I'm Joseph Seymour, Executive Director of the Biomass Thermal Energy Council (BTEC), and I thank you for the opportunity to provide comments on the 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. Since being written in the 70's, rules in Maryland have effectively prohibited the use of biomass for use in small and medium-scale commercial and industrial heating applications. At the same time clean and efficient technologies for biomass utilization have been being effectively implemented in other states throughout the US. For example, Vermont has over 50 schools utilizing locally sourced wood fuels to replace the use of high cost heating oil.

BTEC seeks to advance the market for biomass thermal energy and promote the use of high efficiency equipment and sustainably harvested biomass. BTEC's view is that there is a need for emission standards and air quality rules that ensure biomass installations are clean and efficient. This permits the use of highly efficient technologies, and eliminates the potential for bad performers to generate misconceptions about the biomass industry.

BTEC has reviewed the proposed regulations in detail, and concludes that these regulations will eliminate bad performers while allowing the use of clean and efficient technologies. This rule subjects small and medium-scale biomass energy users to limits as stringent as those Maryland places on larger-scale users. Maryland's biomass resources are substantial, but ultimately finite. The long-term viability of biomass energy requires that these resources be used sustainably, and small-scale, distributed use now allowed by this rule will provide opportunities for use that do not over tax the resource.

This rule is a win for Maryland's jobs, energy security, energy cost reduction efforts, greenhouse gas emission reduction efforts, and Maryland's environment. Thank you again for the opportunity to make a statement in support of this rule."