

BERA Board Opinion Regarding Treatment of Biomass in EPA PSD Tailoring Rule.

The Biomass Energy Research Association would like to impart some opinions related to the referenced rule.

If no "difference" is acknowledged for biomass derived carbon sources, this could effectively be a severe blow to biomass implementation as many end users are counting on the "biomass credit" as an economic value for a project. This rule would be acceptable if EPA also allows for the difference between fossil carbon and biomass (recent and renewable, not fossil) carbon. Since the rule does not mention this, we assume that EPA has not yet allowed for this difference. The rule should reflect this. If there is no time for EPA to justify a specific number or calculation method to distinguish between fossil C and biomass C, we suggest two paths that would be better:

1. Adopt a number that reflects that biomass C is different in long term increase of CO₂ in the atmosphere, and say that this adopted temporary number will apply until 2012, or a later date like 2014 or 2016, at which time EPA will revise, or consider revising the number. The number that we think is valid and not overly favoring biomass would be that biomass power plant C emissions are assumed to be 90% renewable and only 10% "fossil." The so-called "fossil" part is to take into account the indirect fossil carbon emissions that arise on average in the process of growing, harvesting, processing and transporting biomass fuel to the power plant. We think that work on the possible revision of this number will show that this 10% is really more typically 5% and as low as 2% for the best GHG-minimizing systems of biomass fuel supply.
2. Simply say that biomass power plants will not be subject to this until 2014 or later and the rule will be written later. One argument that EPA can make for this is similar to their reason to raise the limits on all plants, namely a decrease in the regulatory work load on the states is a good thing and will make the regulation more effective in terms of tons reduction and cost of the implementation. Another argument is that the replacement of fossil, especially coal, by biomass is to be encouraged, and that exemption of biomass is therefore desirable for meeting reduction goals sooner and at lower cost.

Some clarification is needed on one point: The text of the rule say C but the numbers say CO₂eq, so it would seem that the 75,000 tpy numbers are calculated as C converted to CO₂ by combustion and are for the tons of CO₂ not just the tons of C in the CO₂. As you know, 75,000 tons of C as CO₂ is easier to meet by a factor of 44/12 compared to 75,000 tons of CO₂ itself. So, is the intention to mean 75,000 tons of CO₂ itself in the gases going up the stack? This is not clear.

Thank you for the opportunity to comment on this proposed rule.

Joan Pellegrino
President, Biomass Energy Research Association
www.beraonline.org
410-953-6202

Submitted to:

Roscoe Bartlett
Member of Congress

Peter DeFazio
Member of Congress

Greg Walden
Member of Congress

Kurt Schrader
Member of Congress

Wally Herger
Member of Congress

Brian Baird
Member of Congress

Cathy McMorris Rodgers
Member of Congress