



1901 North Moore Street
Suite 600
Arlington, VA 22209
(703) 522-6778
(703) 522-0548 fax
www.pelletheat.org

Media Contact:
Seth Voyles
703-522-6778 x112

FOR IMMEDIATE RELEASE

EPA'S PROPOSED RULEMAKING, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR AREA SOURCES: INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS (*AREA SOURCE BOILER RULE*), PUTS BIOMASS BOILERS IN PERIL.

The Pellet Fuels Institute submits comments defending the biomass boiler industry against this precarious rule.

EPA has proposed a rule under the Clean Air Act (CAA) – the Area Source Boiler Rule, 75 Fed. Reg. 31,896 (June 4, 2010) – that will affect emissions of hazardous air pollutants from institutional, commercial, and industrial boilers and process heaters burning biomass and other fuels. The stringent hazardous air pollutant limits in this proposed rule will have significant cost impacts on biomass boilers and it will also have the effect of discouraging the future use of biomass in these boilers.

PFI is concerned primarily with EPA's proposed treatment of biomass boilers with design capacity below 10 mmBtu/hr, especially those units below 3 mmBtu/hr.

PFI *does* support EPA's proposal to set a work practice standard, as opposed to a numerical standard, for emissions of Carbon Monoxide (CO) and Particulate Matter (PM) from *existing* units with design capacity below 10 mmBtu/hr. EPA is correct in concluding that: (1) its emissions measurement methodologies for CO and PM generally are not applicable and effective for biomass boilers below that level, and (2) the cost of emissions testing and monitoring for CO and PM for such small units is prohibitive. In the view of PFI, EPA has no rational basis in any event for concluding that the emission data EPA has for CO and PM, largely collected from biomass units above 10 mmBtu/hr, are representative of biomass units below that level. The fundamental designs of biomass boilers below that level vary greatly within that group and from biomass boilers above it.

Additionally, PFI strongly objects to EPA's proposal to set numerical standards of 100 ppm and 0.03 lb/mmBtu for CO and PM respectively for *new* area source biomass boilers with design capacity of less than 10 mmBtu/hr. EPA lacks any rational basis for setting those standards, yet the standards would needlessly destroy the market for a very large percentage of models of small biomass boilers, all of which have important economic usefulness, especially in the drive to substitute renewable fuels for fossil fuels, contrary

to the fundamental requirements of rationality and achievability which underpin section 112(d) of the Clean Air Act. PFI strenuously urges EPA to abandon any effort to set a numerical standard for such boilers, especially those with design capacity less than 3 mmBtu/hr, and at most to set a work practice standard for boilers below 10 mmBtu/hr.

PFI believes that the present record does not provide EPA with a rational basis for setting any numerical limit for CO or PM for area source biomass boilers with design capacity under 10 mmBtu/hr. Instead, since tune-ups are the only form of effective control discernible in the record for such boilers, EPA must set at most a work practice standard requiring tune-ups for them.

The Pellet Fuels Institute, located in Arlington, Virginia, is a North American trade association promoting energy independence through the efficient use of clean, renewable, densified biomass fuel. For more information about pellet heat, contact the Pellet Fuels Institute at (703) 522-6778 or www.pelletheat.org.