

March 12, 2015

Gina McCarthy  
Administrator  
Office of the Administrator 1101A  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Dear Administrator McCarthy:

We are a group of environmental and health advocacy organizations located in Maryland and Washington, D.C. We write to express our concerns that EPA has included biomass power as a form of renewable energy that may be used for compliance under the proposed Clean Power Plan, and further, that EPA's treatment of bioenergy as producing zero carbon emissions will encourage the use of this polluting form of energy.

Biomass power plants are highly polluting, emitting conventional air pollutants and carbon dioxide at rates equal to or higher than coal- and gas-fired plants. Since EPA's goal under the Clean Power Plan is to *reduce* carbon emissions per megawatt-hour generated, allowing bioenergy as a compliance measure under the Plan would be counterproductive. EPA's regulatory impact analysis also estimates substantial benefits to health from reduced air pollution under the Clean Power Plan, but such benefits will be compromised if coal plants are replaced by facilities that are even more polluting.

Currently, Maryland gets much of its renewable energy from some extraordinarily polluting bioenergy facilities. The emissions reported below are from burning wood and black liquor at biomass facilities that collected renewable energy subsidies from Maryland ratepayers in 2012,<sup>1</sup> as reported to EPA's E-GRID database.<sup>2</sup>

Facility	State	E-GRID Emissions in 2010			% of MD Tier I in 2012
		NOx (tons)	SOx (tons)	CO2 (tons)	
Luke Mill	Maryland	186	2,220	739,664	2.68%
P H Glatfelter Co -Chillicothe Facility	Ohio	176	2,339	926,360	1.34%
Stone Container Coshocton Mill	Ohio	248	143	369,234	0.88%
P H Glatfelter Spring Grove	Pennsylvania	134	1,879	751,097	1.33%
Viking Energy of Northumberland	Pennsylvania	91	31	223,343	0.72%
Covington Facility	Virginia	433	4,422	1,564,687	5.65%
International Paper Franklin Mill	Virginia	-	776	240,171	2.09%
Multitrade of Pittsylvania LP	Virginia	115	101	710,877	9.91%
Stone Container Hopewell Mill	Virginia	396	2,589	687,052	6.61%
West Point Mill	Virginia	546	3,832	1,547,483	4.82%
International Paper Kaukauna Mill	Wisconsin	87	853	400,027	0.29%
	<b>Total</b>	<b>2,412</b>	<b>19,183</b>	<b>8,159,994</b>	<b>36.32%</b>

Along with these polluting wood and black liquor burners, Maryland sourced *another* 12% of its Tier 1 renewable energy in 2012 from burning municipal waste, which also degrades air quality and exacerbates climate change. Each year, these waste- and biomass-burning facilities emit thousands of tons of the air pollutants that threaten health, and millions of tons of greenhouse gases. Counting state-level carbon emissions under the Clean Power Plan, but ignoring CO<sub>2</sub> emissions from bioenergy, perpetuates the myth of biomass power as “clean” energy. As the data above show, bioenergy is anything but clean.

Our groups are particularly troubled by the EPA’s apparent decision to treat bioenergy as having zero carbon emissions under the Clean Power Plan because it will undermine the legislative progress we have made locally on this issue, and contradict policies in other jurisdictions. Several of our organizations supported legislation passed unanimously by the Washington, D.C. City Council in 2014 that removes low-efficiency biopower from the city’s Renewable Portfolio Standard. This policy follows the lead of Massachusetts, which removed low-efficiency biopower from the state’s renewable energy portfolio in 2012 after commissioning a study<sup>3</sup> that found high net carbon dioxide emissions from wood-burning power plants would compromise the state’s ability to meet 2020 and 2050 emission reduction targets.

Clean energy advocates are working hard to facilitate the transition to zero-emissions power generation. The Clean Power Plan can be a strong step in that direction, but to achieve this goal, the Plan must not treat highly polluting bioenergy facilities as providing “clean” and “carbon free” energy. EPA recently released its Revised Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources, which is currently undergoing further review by the Science Advisory Board. If EPA intends to apply this framework to the Clean Power Plan, the agency should let the Board complete its review before including biomass in the final rule. If EPA does not fully account for bioenergy emissions under the final Clean Power Plan, it should remove bioenergy as a compliance measure under the rule.

Thank you for your consideration,

Kathy Phillips, Executive Director  
**Assateague Coastal Trust**

Mike Tidwell, Executive Director  
**Chesapeake Climate Action Network**

Andy Galli, Maryland Program Coordinator  
**Clean Water Action**

Hayden Higgins  
**DC Divest**

Chris Weiss, Executive Director  
**DC Environmental Network**

Mike Ewall, Director  
**Energy Justice Network**

Brenda Platt, Co-Director  
**Institute for Local Self-Reliance**

Rebecca Ruggles, Director  
**Maryland Environmental Health Network**

Julie Hantman, DC Field Organizer  
**Moms Clean Air Force – Washington D.C. Chapter**

Trisha Sheehan, Regional Field Manager  
**Moms Clean Air Force – Maryland Chapter**

Matthew Gravatt, Chair, Board of Directors  
**Sierra Club, Washington D.C. Chapter**

Josh Tulkin, Executive Director  
**Sierra Club, Maryland Chapter**

---

<sup>1</sup> Public Service Commission of Maryland. Renewable Energy Portfolio Standard Report, With Data for Calendar Year 2012. January, 2014. Baltimore, MD.

<sup>2</sup> E-GRID does not report particulate matter emissions, but the National Emissions Inventory of 2008 reports the Luke Mill in Maryland as emitting over 500 tons of particulate matter in the form of PM<sub>2.5</sub>.

<sup>3</sup> Walker, T., et al. Massachusetts Biomass Sustainability and Carbon Policy Study: Report to the Commonwealth of Massachusetts Department of Energy. Manomet Center for Conservation Sciences. 2010.