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, as reported to EPA’s E-GRID database.

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

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_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_

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2 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 PM₂.₅.