

Northeast Biomass Thermal Working Group
www.nebioheat.org
c/o Biomass Thermal Energy Council
1211 Connecticut Avenue NW, Suite 600
Washington DC 20036

December 7, 2010

Curt Spaulding.
Regional Administrator
EPA New England, Region 1
5 Post Office Square - Suite 100
Boston, MA 02109-3912

Dear Mr. Spaulding,

The undersigned members of the Northeast Biomass Thermal Working Group are writing with some concerns and suggestions about the November 22 press release from the EPA, "With Cooler Weather, Advice to New Englanders for Safer, Cleaner Wood-Burning." We believe that educating consumers about the importance of clean burning practices and the importance of using EPA certified equipment is essential. The real time air quality map is also very useful.

Our concern is primarily that the EPA, an agency tasked with helping our nation reduce greenhouse gases and increase energy security and energy efficiency, gives little credence to biomass heating in achieving these goals. In February of this year, Administrator Lisa Jackson stated that the Obama Administration "will create jobs, slash greenhouse gas emissions and increase our energy security while helping to put America at the leading edge of the new energy economy." However, in this press release, the EPA only makes a negative comparison between biomass heating and fossil fuels.

In New England, advanced biomass heating technology can help achieve your stated goals, just as it is helping Europe achieve its low carbon goals. In Europe, advanced wood and pellet stoves and boilers are receiving significant government support and incentives to help get families off of fossil fuels. One reason many European governments are pursuing biomass heating is because it is affordable, sustainable and one of few high efficiency renewable heating sources. For example, in Sweden, which has grown GDP over the last decade while shrinking carbon emissions, one of their first initiatives was to displace fossil fuel based heating with biomass heating.

We are also concerned that this press release and your agency in general, do little to urge consumers to consider wood pellet heat as a positive option. To the contrary, the press release lumps pellets together with wood and even suggests that corn and pellet hydronic heaters can produce excessive amounts of smoke, as conventional outdoor wood hydronic heaters do. Pellet heaters are known for their low emissions and in fact were exempted from EPA regulations because of this.

We applaud the EPA's leadership in environmental justice. Wood heat is mainly relied upon by low and middle-income families in the United States. While government agencies aggressively support solar, geothermal and wind energy, those technologies are accessible only to wealthy families. We support the EPA's efforts to regulate wood stoves and require them to be cleaner. But we also call on you not just to regulate a technology relied upon by low and middle-income families, but to promote that technology.

The United States is falling far behind Europe in developing and deploying modern, clean biomass heating systems in part because Europe's regulatory bodies have invested the time and resources to bring a vital technology to scale. We are concerned and disappointed that the EPA is not showing leadership in this arena and not articulating a positive vision for modern, high efficiency biomass heating systems that can help wean this country off of fossil fuels, help achieve energy independence and build jobs at home.

We would like to open a dialogue with you about this important area, and would request a meeting at a convenient time for you.

Sincerely,

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ACT Bioenergy
Schenectady, NY

Charlie Cary
Biomass Combustion Systems
Worcester, MA

John Ackerly
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The Northeast Biomass Thermal Working Group (NEBTWG) is a coalition of biomass thermal advocates committed to working together to advance the use of biomass for heating and CHP (combined heat and power) in the northeastern United States. <http://www.nebioheat.org/>