



Statement of Joy Bergey, Partnership for Policy Integrity
Pennsylvania Department of Environmental Protection Listening Session on the Clean Power Plan
Allentown, Pa.
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Thank you for the opportunity to comment. My name is Joy Bergey. I live in Montgomery County. I represent the Partnership for Policy Integrity, a nonprofit that advocates for clean energy and provides science and legal advocacy to reduce reliance on polluting energy technologies that masquerade as “clean.”

This evening I’ll speak to urge DEP **not** to include biomass co-firing of any coal-burning power plants in our state to meet the Clean Power Plan. My testimony speaks to DEP’s invitation to the public to address the question of how the state can meet its objective of prioritizing indigenous resources – while protecting public health.

PFPI assumes that DEP is categorizing biomass, specifically forestry residue and wood waste, as an indigenous resource. We urge you to make the priority for this particular indigenous resource to leave it where it lies, rather than burning it for energy.

We have done a great deal of research on Pennsylvania’s bioenergy sector, and one thing that’s clear is that although the state has allocated literally tens of millions of dollars in state and pass-through federal funding to bioenergy, biomass-burning facilities in Pennsylvania are some of the most polluting in the nation.

Let me describe an example of a biomass power plant in Pennsylvania and the problems associated with it. Evergreen Community Power, located at the United Coorstack manufacturing operation in Reading (about 40 miles from here), burns waste wood and other waste materials. Despite receiving \$39 million as a taxpayer-funded Stimulus grant, this facility wasn’t required to control its emissions to the maximum extent, and has had many problems meeting its emissions limits over the years. This plant is located in an already polluted area, one of just a couple areas in Pennsylvania that are in non-attainment for EPA’s airborne lead standard, but inexplicably, it is permitted to burn construction and demolition debris and other materials that can emit heavy metals, including lead.

Evergreen is a pre-2012 facility, so it wouldn’t be allowed to serve as compliance under the state’s plan, but there is a real potential that as the state ramps down electricity generation at the most polluting coal plants, the need for power generation could be backfilled by ramping up generation at newer facilities like Evergreen, or by building new biomass and waste-burners.

We are particularly concerned that states may consider allowing existing coal plants to be co-fired with biomass as a means of compliance under the Clean Power Plan. The exact legal status of co-firing biomass under the Plan still isn't clear, but the one thing that is clear is that co-firing biomass with coal decreases facility efficiency increases carbon dioxide emissions. Other emissions can increase, as well – for instance, we've reviewed emissions data from a co-firing test in Ohio that found that emissions of carbon monoxide and certain hazardous air pollutants increased when co-firing just 5% biomass with coal. It may be tempting to see the Clean Power Plan as a stepstone to co-firing biomass for industrial wood waste disposal, but the history of this in Pennsylvania and elsewhere has not been a happy one.

This issue is directly relevant to Allentown, where we're meeting right this evening. Burning wood and burning coal for energy both emit oxides of nitrogen (NOx) and volatile organic compounds (VOC), which create ground-level ozone in the presence of sunlight. Ozone is a serious pollutant that damages human health in many ways. And in fact, Lehigh County is in non-attainment with EPA's health standards for ozone. Let's not make the problem worse.

We at PFPI are not trying to throw a wet blanket on anyone's fireside chats. This isn't about fireplaces or home wood burners. But we're sure the DEP will hear from some that think co-firing is a great way to keep aging coal plants operating, and we don't want to see bioenergy get a "free pass" in Pennsylvania's state plan.

We urge the DEP to take this issue most seriously, and not to be tempted to include biomass as any part of the state plan. It just doesn't make sense to add to the list of items allowed to be burned for credit under the plan, if our goal is to reduce CO2 emissions.

Thank you.