

COUNTY OF EL DORADO

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August 17, 2010

Lisa P. Jackson, Administrator
US Environmental Protection Agency
EPA Docket Center
Mailcode 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: EPA-HQ-OAR-2006-0790, National Emission Standards for Hazardous Air Pollutants for Major and Area Sources: Industrial, Commercial, and Institutional Boilers, Federal Register, Volume 75, June 4, 2010

Dear Administrator Jackson:

The El Dorado County Board of Supervisors (Board) appreciates the opportunity to provide comments on the above referenced United States Environmental Protection Agency's (USEPA) proposed regulation. The County of El Dorado has significant and highly productive agricultural and forested land integrated with urban and rural populations producing a wide range of biomass wastes. There is currently one biomass boiler operating in the County, but our Board supports programs and plans for new facilities to convert biomass wastes into renewable energy in properly designed, operated and controlled facilities. Such biomass utilization has shown to provide significant reductions in particulate matter, toxic pollutants and greenhouse gases as compared with alternative disposal methods of open burning, land filling or in-field degradation.

Our Board is very concerned with the potential consequences of the proposed regulations and does not support the new Maximum Achievable Control Technology (MACT) standards for industrial boilers for major and area sources. The proposed boiler MACT standards have not been properly determined and if implemented will result in multiple adverse outcomes. Compliance with this regulation will require existing facilities to install expensive and mostly untested "end of pipe" control technologies, which are not required to protect human health or environment. The implementation of MACT will result in a shutdown of many existing biomass plants throughout California and prevent construction of new facilities. Such scenario will almost certainly cause significant increases in local and regional levels of particulate matter, toxic pollutants and greenhouse gases since unmanaged biomass wastes will be consumed by open burn wildfires or land fills. In addition, it will be necessary to burn more fossil fuel to accommodate for lost biomass energy.

Our Board urges USEPA to review and modify the proposed unattainable MACT standards to assure the final rule is sustainable and protects the environment and public health without creating severe economic hardship.

Sincerely,

Raymond J. Nutting, First Vice-Chairman
El Dorado County Board of Supervisors