



**OMB/CMRA Meeting on C&D Biomass
RIN 2050-AG44
Nov 29, 2011**

Reason For Visit

C&D is a clean, non-hazardous traditional fuel that is thoroughly processed into a valuable fuel product. State and federal regulations, as well as end market boiler operator requirements, work to produce a safe, non-hazardous product. For these reasons C&D wood is a highly processed fuel that should be exempt from the non-waste determination process.

Explanation of C&D Material Stream

Turley

Building-related construction and demolition activities generated approximately 178 million tons in 2008. Wood is approximately 45 million tons of this material. The main market for processed C&D wood is a renewable, biomass fuel that can be combusted in boilers. These boilers use a variety of fuels. The renewable fuel produced from C&D wood displaces fossil fuels such as coal. These boiler markets provide an important financial resource for C&D recycling facilities. With the rise of C&D recycling, driven by factors including rising landfill prices, state and private sector diversion goals and green building programs, it is estimated 20 million tons of C&D wood are used annually as biomass—enough to power 3 million homes. Both the Administration, Congress and many states promote the use of alternative fuels such as biomass.

Processing Steps

Turley

C&D Biomass Fuel Qualities

Lee

In the NHSM rulemaking, EPA finds the heating value of C&D wood to be clearly that of a fuel (~8000 btu/lb) and greater than virgin biomass as C&D wood is typically kiln-dried. EPA clearly recognizes this fuel reduces GHG emissions as EPA repeatedly recommends new and modifying facilities use biomass fuel, such as C&D wood, as a means of GHG control. 45 million tons of C&D wood fuel could reduce fossil fuel (presumably coal) CO₂ emissions by 79 million tons per year.

C&D Biomass in Current NHSM Rule

Miller

Clean C&D Wood is included in the definition of “Clean cellulosic biomass” and thereby included in the definition of “Traditional fuels.” The last sentence of the “Clean cellulosic biomass” definition infers clean biomass must be as clean as virgin biomass from the forest.

A determination that C&D wood is a fuel (and not a waste) should be focused on sufficient processing and not on contaminant levels. Sufficiently processed C&D wood becomes a fuel commodity and is not a discarded waste. Air emissions and contaminant levels would be better addressed through the air emission standards rather than through a waste vs. fuel determination under Part 241. This is different than a determination of whether a “waste” is hazardous or not – which would be tied to contaminant levels.

Steps Needed To Continue C&D Biomass Use

All

- Define C&D processed fuel to be a traditional fuel exempt from the NHSM Rule non-waste determination process;
- Clean when compared to fossil fuel it is replacing and where it meets end user specifications.