

The U.S. Environmental Protection Agency (EPA) has declared heat-trapping greenhouse gas emissions a threat to public health and welfare, setting the stage for potentially major air protection regulations to address climate change.

EPA Administrator Lisa Jackson supports the finding that greenhouse gases endanger public health and welfare. Common greenhouse gases in the Earth's atmosphere include water vapor, carbon dioxide, nitrous oxide, and hazardous air pollutants that contribute to ozone.

The endangerment finding will obligate EPA to limit greenhouse gases in the future along with other air pollutants that require regulation under the Clean Air Act. This also includes carbon monoxide and sulfur dioxide, two of the proposed plant's largest emissions.

So, I am here to request that Seneca take the high road to install the most effective air pollution control technology, because it is cheaper to install the best emission equipment during construction rather than wait until they will likely be regulated by the federal government in the near term.

Seneca intends to reduce NOx emissions by 45% with Selective Non-Catalytic Reduction (SNCR), and to use "good combustion practices to minimize CO emissions," but that is simply not enough to protect public health.

In the packet we sent to the EWEB Board last week, OTA made the case that before EWEB signs any contract with Seneca, the Board should require that the company further reduce their emissions by using better and more effective technology that is proven and available.

The Regenerative Selective Catalytic Reduction, or RSCR system has been shown to be an effective, reliable, and economical means to reduce very low NOx emissions from biomass plants. "RSCR" achieves NOx reductions of greater than 80% – that is almost twice as effective as what Seneca is currently proposing. A CO oxidation catalyst can be provided on top of the SCR catalyst to achieve greater than 50% CO reduction *simultaneously* with NOx reduction. At present Seneca is claiming that their chosen emission control technology is not capable of reducing both NOx and CO.

The RSCR system has been installed on three wood-fired boilers in the US – two 15 MW units in New Hampshire and a 50 MW unit in Maine. The goal of all installations was to qualify for Connecticut Renewable Energy Credits (REC).

Why is it absolutely necessary for EWEB to work with Seneca to require the most up-to-date air pollution control before signing a contract? It is necessary because EWEB is a public utility that is chartered to serve the interests of its citizens. Every single EWEB customer will be breathing the toxic emissions from the Seneca Biomass plant – with residents located in West Eugene bearing the brunt of the impact.

EWEB should not abet any attempt to externalize Seneca's cost of using cheaper air pollution control technology on to the health costs and quality of life of EWEB customers. We request that the Board postpone any decision about the contract with Seneca until more research can be done to validate the new information about RSCR systems. An opportunity is coming up on April 28, when the International Biomass Conference and Expo is meeting in Portland for their annual conference.