

Chronology of SAB activities and advice regarding Biogenic Carbon Emissions from Stationary Sources

In 2011, EPA developed a draft document, Accounting Framework for Biogenic CO₂ Emissions from Stationary Sources (September 2011). The context for the Framework arose when the EPA established thresholds for greenhouse gas emissions from stationary sources for the purposes of Clean Air Act permits under the New Source Review (Prevention of Significant Deterioration program) and Title V operations program. The agency needed to consider how to include biogenic emissions in determining whether thresholds for regulation have been met. In July 2011, the EPA deferred the application of permitting requirements to biogenic carbon dioxide emissions from bioenergy and other biogenic stationary sources for three years, while conducting a detailed examination of the issues associated with biogenic CO₂. To explore the scientific and technical issues associated with accounting for emissions of biogenic carbon dioxide (CO₂) from stationary sources and to develop a method to adjust the stack emissions from bioenergy based on the induced changes in carbon stocks on land (in soils, plants and forests). The [SAB reviewed](#) the draft framework (see report [EPA-SAB-12-011](#)) and identified a number of limitations and implementation challenges.

The agency subsequently revised the 2011 framework report and has asked the SAB to review of the revised technical report. The agency submitted a second report for the SAB to review in 2014 [Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources, EPA Office of Air and Radiation, November 2014](#). (PDF, 69 pp., 2,233,864 bytes). In February of 2015, the SAB created an [ad-hoc panel comprised of members](#) that participated in the previous review. The activities of the Biogenic Carbon Emissions Panel are posted on the SAB webpage under the [Biogenic Carbon Dioxide Emissions from Stationary Sources - Assessment Framework](#).

Quality Reviews

The Biogenic Carbon Emissions Panel submitted a draft report for quality review at a [March 2016 SAB public meeting](#). The SAB discussed the [draft report](#) during [quality review](#). The SAB voted to return the report back to the panel with a [set of requested changes and concerns](#) to be addressed. In May 2016, SAB members worked with the Chair of the Biogenic Carbon Emissions Panel and scheduled an [October 12, 2016 public teleconference](#) with panel members to address the SAB direction from the Quality Review of March 2016.

The Biogenic Carbon Emissions Panel provided an [explanatory memorandum](#) of revisions and a [revised draft](#) in June of 2017 for a second quality review. The SAB conducted that quality review at an [August 2017 public meeting](#). The revisions did not address the SAB comments on time frame and presented a single recommendation rather than expanding the discussion to identify the range of potential policy frameworks. The Chair of the SAB worked with SAB members and the panel members to provide additional revisions to the sections of the June Draft (the [letter to the Administrator](#) and the [Executive Summary](#)) to facilitate the second quality review discussion. The additional revisions and [instruction from the Chair](#) of the SAB were sent in an email to SAB members.

The SAB discussed the revisions and found they did not address all the requests the SAB requested in the March 2016 quality review. They discussed possible revisions, implications of not completing the report, and exercising a pocket veto. A motion was made to not complete the report and seconded but failed overwhelmingly. Another motion was made for lead quality reviewers to revise the report to reflect the SAB discussions, acknowledge and describe the complexity of the subject matter in the

report, and use portions of the panel draft report to develop a revision for the SAB's review. This motion passed by voice vote. The result of the August 2017 review was lead SAB reviewers and the members were to be charged with that task.

The Next Steps

The SAB was briefed in May 2018 regarding old business in a preparatory meeting. The Board agreed to review a revised report during a third quality review at an upcoming meeting. The previous drafts of the Panel's reports will remain on the SAB web pages to document the Biogenic Carbon Emission Panel's work.

- A group of SAB members will revise the June 2017 report based on the SAB discussions, using sections of the June 2017 draft and add information to the report to improve the clarity, identify major issues, and explain the complexity of accounting for biogenic carbon emissions.
- Suggested members to revise the report should be the lead reviewers from previous reviews and members with expertise. Drs. Steve Hamburg, Bill Schlesinger and Jeanne VanBriesen agreed to participate.
- The SAB members will work toward a draft being ready for the SAB by August 2018.
- The SAB would conduct a quality review to finalize the report in late summer report selecting new quality review leads from the SAB members.