

**ADDITIONAL COMMENTS OF RECOMMUNITY, INC.
TO THE
SCIENTIFIC ADVISORY BOARD BIOGENIC CARBON EMISSIONS PANEL
FOR ITS REVIEW OF THE ENVIRONMENTAL PROTECTION AGENCY
DRAFT BIOGENIC CARBON DIOXIDE EMISSIONS ACCOUNTING
FRAMEWORK**

May 25, 2012

ReCommunity, Inc. is submitting these additional comments to the Scientific Advisory Board (SAB) Biogenic Carbon Emissions (BCE) Panel regarding its advisory report to the Environmental Protection Agency (EPA) on the draft Accounting Framework for Biogenic Carbon Dioxide Emissions (Accounting Framework). On March 16, 2012, ReCommunity submitted written comments for the March 20, 2012 teleconference of the BCE Panel and presented oral comments on the teleconference.¹ On May 18, 2012, ReCommunity submitted supplementary written comments for the May 23, 2012 teleconference of the BCE Panel.²

In these brief additional comments, ReCommunity expresses agreement with the Panel members who opined that the Panel should not recommend a certification system. ReCommunity would also like reemphasize its position that the Accounting Framework must be simple and practical in order to incentivize the use of biogenic fuels, like ReEngineered Feedstock, that convert waste materials otherwise destined for the landfill into a fuel.

I. RECOMMUNITY AGREES THAT A FACILITY-SPECIFIC CERTIFICATION SYSTEM IS IMPRACTICAL AND SHOULD NOT BE ENDORSED OR RECOMMENDED BY THE BCE PANEL

In our March 16 comments, ReCommunity endorsed the use of a general certification system for feedstocks as one potential approach that the BCE Panel might adopt. At the time, the certification system ReCommunity envisioned was one that would provide a single national certification for ReEngineered Feedstock. However, during the May 23 teleconference, Panel members indicated a certification system would in fact be a complex, facility-by-facility process involving negotiated factors and facility monitoring. Such a certification system would be overly complex, impractical and a disincentive to using fuels such as ReEngineered Feedstock. Further, a simpler certification of a specific feedstock that a facility would self-certify essentially would

¹ Comments of ReCommunity, Inc. to the Scientific Advisory Board Biogenic Carbon Emissions Panel for Its Review of the Environmental Protection Agency Draft Biogenic Carbon Dioxide Emissions Accounting Framework, March 16, 2012 [hereinafter March 16 comments], [http://yosemite.epa.gov/sab/SABPRODUCT.NSF/0DD4CF7991D05BE7852579C6004C41FA/\\$File/ReCommunityCommentsBiogenicCO203162012.pdf](http://yosemite.epa.gov/sab/SABPRODUCT.NSF/0DD4CF7991D05BE7852579C6004C41FA/$File/ReCommunityCommentsBiogenicCO203162012.pdf).

² Comments of ReCommunity, Inc. to the Scientific Advisory Board Biogenic Carbon Emissions Panel for Its Review of the Environmental Protection Agency Draft Biogenic Carbon Dioxide Emissions Accounting Framework, May 18, 2012 [hereinafter May 18 comments], [http://yosemite.epa.gov/sab/sabproduct.nsf/D4E4CF93D10B6CB585257A050047C404/\\$File/ReCommunity+Comments+submitted+5-18-12.pdf](http://yosemite.epa.gov/sab/sabproduct.nsf/D4E4CF93D10B6CB585257A050047C404/$File/ReCommunity+Comments+submitted+5-18-12.pdf)

be equivalent to a feedstock-specific biogenic accounting factor (BAF) approach. ReCommunity therefore agrees with Panel members who argued against the inclusion of a certification system in the BCE Panel's recommended options.

A certification system that would require facility-by-facility monitoring and/or negotiation of factors would be burdensome for EPA, the certification authority, and the stationary source. Requiring stationary sources to obtain such certification would increase their transaction costs and create a significant barrier to the adoption of biogenic fuels. In contrast, a feedstock-specific BAF methodology would offer the following benefits:

- Centralizing decision making, either with EPA or a body designated by EPA, with regard to assigning a BAF to an individual feedstock.
- Moving the focus away from the myriad stationary facilities, thus reducing or eliminating the complexity inherent in determining BAFs for individual facilities across the United States.
- Increasing clarity and predictability, as potential customers would be able to make investment decisions based on the BAF assigned to the feedstock they were interested in purchasing.

II. THE ACCOUNTING FRAMEWORK SHOULD SERVE AS AN INCENTIVE TO THE BROAD ADOPTION OF BIOGENIC FUELS AS A PART OF A HOLISTIC SOLUTION TO REDUCE FOSSIL CO₂ EMISSIONS

As we have emphasized in our earlier comments, ReCommunity agrees with the industry, government and NGO stakeholders who urge that the Accounting Framework not be overly complex. The BCE Panel's recommendations should encourage a practical, workable Accounting Framework that incentivizes the creation and adoption of biogenic fuels like ReEngineered Feedstock. There is no question that the use of biogenic fuels implicates a host of issues, such as prior land use, leakage, and additionality to name a few. ReCommunity does not call for simplicity in an effort to minimize or delegitimize these very real concerns. However, ReEngineered Feedstock and similarly situated fuels that derive all of their biogenic content from non-recyclable waste, that would otherwise be landfilled, simply do not implicate the concerns associated with other types of biomass such as woody or agricultural biomass. Rather, as discussed in ReCommunity's May 18 supplementary comments, ReEngineered Feedstock would displace virgin coal, increase recycling, reduce landfilling, and serve as a control technology for criteria pollutants and hazardous air pollutants without impacting prior land use or food prices. It is precisely this type of technology that the Accounting Framework should seek to incentivize. An Accounting Framework that both recognizes that GHG benefits of ReEngineered Feedstock through an appropriately low BAF and establishes a framework that would allow stationary sources to adopt such a fuel without burdensome transaction costs would create such an incentive.

CONCLUSION

As described in ReCommunity's March 16 comments, May 18 comments, and herein, ReEngineered Feedstock provides numerous environmental and community benefits, including GHG reductions, reductions in other pollutants from coal-fired boilers, reduced landfilling, and beneficial community partnerships. ReCommunity urges the BCE Panel to recommend a feedstock-specific BAF approach and encourage the adoption of an Accounting Framework that serves as an incentive for the creation and broad-based adoption of biogenic fuels like ReEngineered Feedstock.