

**Statement of the Coal Utilization Research Council**  
**Shannon Angielski, Associate Director**  
**EPA SAB Meeting**  
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- The Coal Utilization Research Council (CURC) is an industry advocacy group that promotes the efficient and environmentally-sound use of coal, with a focus on the development and deployment of clean coal technologies, including carbon capture and storage (CCS). CURC members include universities, CCS technology developers and vendors, coal companies and electric utilities and trade associations.
- CURC is a proponent of increased RDD&D for CCS as a critical technology in the portfolio of options to reduce GHG emissions while continuing to use our abundant, reliable and affordable domestic resource – coal. CURC members have been involved in the research and deployment of CCS demonstration technologies.
- Carbon capture technology, at the scale necessary to comply with the proposed NSPS, has not been adequately demonstrated. The technology is neither commercially-available nor economically-feasible on commercial scale power generation systems. While there are projects in development and scheduled to come on line in the future, at this time, there is not one commercial-scale CCS project in operation that is fully integrated with electricity generation – that means there is no large scale electricity generation station that has applied a carbon capture system at the levels being proposed by EPA that must compress the CO<sub>2</sub>, then transport it via pipeline into a geologic storage reservoir or for use in enhanced oil recovery. The technology, therefore, has not been demonstrated at commercial scale and at the emissions standards being proposed by EPA for EGUs.
- Due to a variety of factors, including current and pending environmental regulations and the low price for natural gas, no new coal plants have been announced since 2010 and according to EIA, none are forecasted to be built until the late 2020s. Additional demonstrations of the technology will be critical to reducing the costs of CCS. As a result, we expect this rule to stall CCS development (and will not promote further CCS development as suggested by EPA).
- While the proposed NSPS attempts to focus only on the capture technology at the coal-fired plant, the disposition of that CO<sub>2</sub>, whether used for enhanced oil recovery, other commercial purposes, or stored in geologic formations, continues to have technical, legal and regulatory barriers, and introduces significant operational complexities for EGU operators due to their dependence on the downstream disposition of the CO<sub>2</sub> that is not likely to be in their control. While these issues have been identified and have been deemed to not be insurmountable, they have still not been tested or resolved.

- It is both necessary and appropriate that the SAB take up this issue and weigh in on the state of the technology development and the adequacy of EPA's cost estimates and projections.