

Comments by Alan Muller, Energy & Environmental Consultant

On April 29th, the US Environmental Protection Agency rolled out "Proposed Rules for Boilers and Process Heaters and Commercial/Industrial Solid Waste Incinerators."

These rules are long-delayed and not overly-stringent, but the burner people are complaining up a storm.

(1) The fact sheet for one proposed rule (boilers at "area source facilities") says the health benefits will include avoiding:

110-300 premature deaths,
81 cases of chronic bronchitis
190 nonfatal heart attacks and so on

per year.

(2) Another proposed rule applying to boilers at "major source facilities" is estimated to avoid 1900 to 4800 premature deaths per year, and so on. EPA estimates this rule would keep 15,000 pounds per year of mercury out of the air.

(3) A third proposed rule applies to "Emissions Standards for Commercial/Industrial Solid Waste Incinerators" Fact sheet. This rule is estimated by EPA to keep sixty million pounds per year of various health-damaging pollutants out of the air.

These proposed rules don't apply to garbage incinerators such as the "HERC" in Minneapolis. Garbage burners have their own "municipal waste combustor" rules. They would--eventually, when enforced--apply to various wood burners, poultry litter burners, chemical waste incinerators, heating boilers, etc, in Minnesota.

A public comment period is open until August 3, 2010, and public hearings are being held in Virginia, Texas, and California. (Note none in the Midwest.)

The materials posted by EPA about these three rules totals over 1500 pages.

Comments can be submitted by email to a-and-r-docket@epa.gov and by various other means described here: [Hearing and Comment Period Information: \(PDF\)](#)

There will be a big industrial campaign against these rules. Example:

*Bob Cleaves, president and CEO of the **Biomass Power Association**, said the regulation "lacks economic rationality," and while the federal government "has its heart in the right place," the new regulation would be "impossible to comply with."*

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