



October 7, 2024

Submitted electronically via ePUC

Holly Anderson
Clerk of the Commission
Vermont Public Utilities Commission
112 State Street
Montpelier, Vermont 05620

Re: Petition of Vermont Renewable Gas, LLC for a certificate of public good, pursuant to 30 V.S.A. § 248(j), for approval to construct and operate a 2.2 MW farm methane facility in Lyndon, Vermont, Case No. 24-2797-PET

To the Public Utilities Commission:

The Partnership for Policy Integrity (PFPI) urges the Commission to reject Vermont Renewable Gas's (VRG) application for an expedited 248(j) review process for its proposed biomass facility in Lyndon, and instead require a full review in order to allow more time and opportunity for local communities and members of the public to get answers about the potential impacts of this proposal.

PFPI has reviewed VRG's application and the operating permit that the Agency of Natural Resources (ANR) issued for this proposed facility. We are particularly concerned about the potential air emissions from the facility and impacts on the surrounding community.

According to the application, the facility will emit more than 2.5 tons per year (tpy) of hazardous air pollutants (HAPs), mostly formaldehyde, which EPA lists as a "known human carcinogen." Other HAPs emitted include 1-3 butadiene, a known human carcinogen, and acetaldehyde, which is listed as a "probable" human carcinogen.

While the operating permit requires the facility to install a catalytic reduction system to achieve Vermont's "Hazardous Most Stringent Emission Rate" (HMSER), ANR acknowledged that the facility could still exceed the Action Levels for these extremely harmful emissions:

"...the Agency has determined that the Facility, following imposition of HMSER as noted above, may continue to have estimated emissions of 1,3-butadiene (106-99-0), acetaldehyde (75-07-0) and formaldehyde (50-00-0) **in excess of their respective Action Level...**" (emphasis added)

Nevertheless, ANR opted not to require an Air Quality Impact Evaluation:

“The Agency has reviewed several factors relating to this Facility, including, but not limited to those listed in §5-261(3)(a)-(c) of the Regulations **and the level of emissions and emission reduction measures typical for this category of emission source.** Based on this review, the Agency is not requiring the Facility to conduct an air quality impact evaluation pursuant to §5-261(3) of the Regulations at this time.”

The absence of an air quality impact analysis for this facility raises many questions. Since the proposed High Temperature Ablative Pyrolysis (HTAP) process is an unproven technology that has not been utilized anywhere else in the country, and perhaps the world, what real world emissions data exist for this category of emission source? Given the experimental technology and the proximity of businesses, residents, and a day care center, there are serious concerns that the air quality impacts, both from the HAPs as well as the other harmful air emissions from the proposed facility, have not been fully evaluated.

PFPI also wants to point out the obvious: the proposed project is completely unnecessary for the purpose of generating electricity. Converting wood to methane to burn for electricity is expensive, resource-intensive and inefficient. Some might even call it absurd. As the Commission knows, there are far cheaper and easier ways to produce electricity for the grid, not to mention more cost-effective measures such as energy conservation and efficiency programs.

Clearly this is a pilot project whose primary purpose is to develop an experimental technology to convert wood to liquid biofuels – the production of electricity is secondary. This type of technology has never been proven commercially feasible anywhere in the world, despite the millions of dollars in government funding that has been dedicated for research and development over the past two decades.

Because the facility is a pilot project, its small size has allowed it to take advantage of various loopholes in the law, including the opportunity to seek an expedited 248(j) review. We believe that the serious questions and community concerns about the health and safety impacts of this proposal merit a full scale 248 proceeding.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Laura Haight". The signature is written in dark ink and is positioned above the typed name and contact information.

Laura Haight
U.S. Policy Director
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