

Hello DOER-

Thanks for issuing the draft modifications to the APS. I wanted to note the omission of thermal biomass digestion in the proposed APS regulations.

This comes in two forms, composting with heat recovery (aerobic digestion) and biogas systems without electrical grid connections (anaerobic digestion). I believe these practices would contribute to the state's goals for developing alternative energy with economic and GHG mitigation benefits, as this systems are already in commercial use in this region.

I am most familiar with aerated composting systems with heat recovery that provide useful thermal energy for on-site applications. Our company Agrilab Technologies Inc. has the most installed composting systems with heat recovery out of the 44 sites reviewed by Dr. Matt Smith at the UNH Organic Research Dairy Farm. There have been permanent and short-term systems in VT, NY, NH, MA and just last month, CT.

There is a significant opportunity to incorporate renewable energy recovery at farms, municipal and commercial composting sites in MA and beyond. I would be happy to share additional information on the technologies, practices and project summaries.

Thank you for your consideration.

Sincerely

Brian

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