Dear Mr. Chairman and Committee Members,

Thank you for allowing our testimony today in support of HB0332. The Montgomery Countryside Alliance, founded to preserve the natural environment, open spaces and rural lands in Montgomery County’s Agricultural Reserve, strongly urges you to support the proposed bill to remove incineration from the Renewable Portfolio Standards for three reasons: 1) burning trash is not clean; 2) burning trash undermines Montgomery County’s Climate Action Plan; and 3) burning trash is not healthy.

**Burning Trash is Dirtier Than Coal.** Burning trash is not clean energy: to produce the same amount of energy, trash incinerators emit more greenhouse gases than coal plants do. Trash incinerators are the dirtiest way to make electricity by most air pollution measures. Even with air pollution control equipment in place, trash incinerators emit more pollution than (largely uncontrolled) coal power plants per unit of energy produced.

To produce the same amount of energy as coal power plants in Maryland, the Montgomery County incinerator -- operated by Covanta -- releases 15% more fine particulate matter, 60% more arsenic, 68% more greenhouse gases, and 94% more nitrogen oxide (which triggers asthma), 3.5 times the amount of chromium, 11 times more lead, 21 times more cadmium, 26 times more mercury, and 50 times more hydrochloric acid than a coal plant. Incinerators release 3.1 times the amount of mercury as landfills.

Covanta claims that the pollution created by incinerators has decreased dramatically in the past ten years; however, as Covanta has admitted, the industry-wide reductions are not primarily from the installation of pollution controls on some existing facilities. In fact, most of the reduction is due to incinerators closing down.

Similarly, the pollution controls for our Maryland incinerators do not compare favorably to other facilities in the United States. Both Wheelabrator in Baltimore and Covanta in Montgomery County would be illegal to operate if they were built today. The Wheelabrator incinerator is a principal source of much of the city’s pollution. In 2017, it was reported to be 82% of the sulfur dioxide and 64% of the nitrogen oxides
emitted by smokestacks within city limits. Wheelabrator emits 150 ppm of nitrogen oxide and the Dickerson plant emits 85-90 ppm, compared to the facility in West Palm Beach, Florida that emits 45 ppm. Any new incinerator must meet the 45 ppm standard.

Allowing Incineration in the RPS Undermines Montgomery County’s Climate Action Plan. Montgomery County has committed to reducing its greenhouse gas emissions by 80% by 2027 and 100% by 2035. A critical element of achieving that ambitious goal is for it to get its energy from clean, renewable energy sources. Allowing incineration (and other dirty energy sources such as black liquor) in the Renewable Portfolio Standards undermines Montgomery County’s Climate Action Plan (as well as Maryland’s Greenhouse Gas Reduction Act) because dirty energy counts toward clean energy requirements.

Incinerators Are Not Healthy: Health data studied in Baltimore strongly supports that incinerators sicken Marylanders. In December 2017, the Abell Foundation, in conjunction with the Environmental Integrity Project, published a study entitled “Asthma and Air Pollution in Baltimore City.” The study found that Baltimore’s asthma rate is three times greater than the rest of Maryland and that the highest incidence of asthma occurred in those zip codes that are adjacent to major emitters of air pollution: 21230, in which the Wheelabrator incinerator is located, and 21226, in which has other major facilities are located. The Wheelabrator incinerator is the single largest stationary source of Nitrogen oxide in Baltimore. The plant emitted 1,141 tons of nitrogen oxide in 2016, making it the state’s fifth largest emitter of that pollutant. The Wheelabrator incinerator is also a major source of sulfur dioxide and other toxic air pollutants. According to the Baltimore City Health Department, the average life expectancies for babies born to families in Cherry Hill, Curtis Bay and Brooklyn are all less than 70, a decade less than the statewide average. In Westport, residents are more than twice as likely to die of lung cancer than those in the Guilford or Homeland neighborhoods of North Baltimore. The Chesapeake Bay Foundation estimated that the facility’s emissions cost Maryland $21.8 million in health care expenses annually, and $55 million overall in annual health expenses.

Similarly, the Dickerson trash incinerator is the single largest industrial emitter of air pollutants in Montgomery County. This facility produces approximately 740 tons of air pollutants and sends 180,000 tons of toxic ash to landfills in Virginia. This trash incinerator is located in the Agricultural Reserve, negatively affecting the natural environment, open spaces and productive agricultural lands that surround it.

In Baltimore, Montgomery County, and throughout the state of Maryland, trash incineration contributes to air pollution that harms residents’ health; those residents should not be required to subsidize this pollution through the Renewable Portfolio Standard.
For these reasons, we urge you to support HB0332 and remove incineration from the Renewable Portfolio Standards.