



**Testimony Supporting HB438**  
**House Economic Matters Committee**  
**February 20, 2020**

Written testimony to the Economic Matters Committee in **support of HB 438** provided by the **Environmental Integrity Project**.

The Environmental Integrity Project supports HB 438 because burning trash does not produce clean or renewable energy. There are two trash-burning incinerators, sometimes called waste-to-energy (WTE) incinerators, that operate within the State of Maryland: the Wheelabrator incinerator in Baltimore City and the Montgomery County Resource Recovery Facility (MCRRF) in Montgomery County. Currently, Maryland classifies these incinerators as Tier-1 renewable energy sources under its Renewable Portfolio Standard (RPS), which should not be allowed.

Trash incinerators typically emit more air pollution per unit of energy (measured in megawatt hours (MWh)) for many harmful pollutants than coal-fired power plants. Incinerator emissions include pollutants like mercury and lead that disproportionately harm children, are harmful even in small doses and bioaccumulate over time. In 2018, Maryland’s two incinerators emitted, on average, seventeen (17) times more of the neurotoxin mercury per unit of energy than Maryland’s four largest coal plants: Chalk Point, Morgantown, Brandon Shores, and Herbert A. Wagner. In addition to mercury, the incinerators emitted, on average, five times as much nitrogen oxides (NOx) per unit of energy as those coal plants. NOx is the primary pollutant that causes ground-level ozone to form, and parts of Maryland do not meet federal air quality standards for ozone.<sup>1</sup> Our analysis also showed that the incinerators emitted two times as much carbon monoxide per unit of energy generated than the previously mentioned coal-fired power plants. See the table below.<sup>2,3</sup>

Facility	2018 Mercury Emissions (lbs/TWh)	2018 NOx Emissions (lbs/MWh)	2018 CO Emissions (lbs/MWh)
Chalk Point Plant	5.30	1.91	0.27
Brandon Shores and H.A. Wagner Plants <sup>4</sup>	4.24	0.86	0.23
Morgantown Plant	3.40	0.57	0.22
Wheelabrator/Montgomery County Incinerators	71.4	4.29	0.40

<sup>1</sup> Maryland Department of the Environment, *Clean Air Progress Report 2019*, p. 3, available at <https://mde.maryland.gov/programs/Air/Pages/AirQualityReports.aspx>.

<sup>2</sup> U.S. Environmental Protection Agency. Emissions & Generation Resource Integrated Database (eGRID), *eGRID2018* Dataset. Used to gather energy generation data (net generation in MWh) for each facility.

<sup>3</sup> Maryland Department of the Environment 2018 Emission Inventories, obtained through request under the Maryland Public Information Act. Used for emissions data.

<sup>4</sup> The Brandon Shores and HA Wagner plants are located together at the Fort Smallwood coal plant complex.

Incinerators do not rely on a form of renewable energy, but instead rely on a fixed waste stream, typically consisting of thousands of tons of trash a day. To the extent that incineration avoids methane emissions that would be produced by landfilling the same waste, Maryland should strengthen requirements for the monitoring and control of landfill methane rather than subjecting communities near incinerators to toxic pollution. More importantly, Maryland should seek to increase recycling and composting rates and source reduction programs as more effective methods for waste management.

Finally, by including WTE incinerators in Maryland's RPS, Maryland diverts incentives away from truly clean and badly needed sources of real renewable energy, like wind and solar energy. In fact, over 30% of the Tier 1 renewable energy credits generated in 2017 within Maryland's borders were from burning trash.<sup>5</sup> Governor Hogan, in his Clean and Renewable Energy Standard (CARES) plan, recognizes the need to remove trash incinerators from the RPS.<sup>6</sup>

As demonstrated by their toxic emissions at or above levels of coal-fired power plants, trash incinerators are hardly a clean technology. Classifying these facilities as clean and renewable energy is not only inaccurate, but also adds more pollution to areas that are already struggling to meet air quality standards. In sum, trash incinerators not only impact the health of nearby and distant populations, but also replace other Tier 1 renewable energy projects. Therefore, we urge the Committee to vote in favor of removing WTE incinerators from Maryland's RPS.

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<sup>5</sup> Public Service Commission of Maryland, Renewable Energy Portfolio Standard Report, With Data for Calendar Year 2017 (November 2018), p. 17, at <https://www.psc.state.md.us/wp-content/uploads/FINAL-Renewable-Energy-Portfolio-Standard-Report-with-data-for-CY-2017.pdf>.

<sup>6</sup> The Office of Governor Larry Hogan, Governor Hogan Unveils Bold Energy Legislation at <https://governor.maryland.gov/2019/12/17/governor-hogan-unveils-bold-energy-legislation/>