



Testimony in Support of Senate Bill 514

Environment - Incinerator Permits – Condition for Issuance

Education Health and Environmental Affairs

February 26, 2010

Position: Support

Good afternoon, Clean Water Action and the organizations listed below support Senate Bill 514, prohibiting the Secretary of the Environment from issuing permits to construct or materially alter an incinerator located within 3 miles of specified locations.

For the record Clean Water Action does not support incineration as a means of either the disposal of municipal solid waste or the generation of power. Our research shows that any incinerator project would involve significant negative environmental, health and fiscal impacts to the communities and residents of Maryland where it might be sited. Although studies show that people living and working near incinerators are at the greatest health risk there is also evidence that no safe distance from incinerators may exist. However, we support Senate bill 514 as a first step to protecting communities from the health impacts and risks from the many dangerous emissions during the regular daily operation of incinerators.

Incinerators burning solid waste transform garbage into harmful air pollutants and toxic solid and liquid waste. For example, burning plastic bags and organic materials creates dioxins. Dioxins are the most notorious pollutant associated with incinerators, which even in small amounts cause cancer, immune disorders and developmental problems. Currently the EPA does not require emission limits for ultra fine particles that may be taken into the lungs and from there into the bloodstream. For example, in one MDE report for the Harford County incinerator, there were nearly 200 toxins released. However, when you read the contract you see in the Environmental Guarantee section you see that only about 12 of these emissions are regulated.

There is extensive international scientific literature on the dangerous health effects of dioxins such as Persistent Organic Pollutants [POPs] created from incineration. This research is best summarized in two documents: the U.S. Environmental Protection Agency's (USEPA) "Draft Summary of the Dioxin Reassessment," and "America's Choice: Children's Health or Corporate Profit: The American People's Dioxin Report" by the U.S.-based Center for Health, Environment and Justice. The science summarized in these reports indicates a wide variety of health effects in humans and animals, including cancer, IQ deficits, disrupted sexual development, birth defects, immune system damage, behavioral disorders (such as hyperactivity).

In 2001 USEPA Administrator Christie Whitman delivering President Bush's remarks concerning the dioxin Persistent Organic Pollutants [POPs] stated, "POPs have been linked to numerous adverse effects in humans and animals. Those include cancer, central nervous system damage, reproductive disorders and immune system disruptions. They are, in fact, lethal."

When air pollution control equipment does function properly, it removes pollutants from the air and concentrates them into a hazardous waste stream that needs further treatment. Thus, the problem of pollutant releases is not solved; the pollutants are simply moved from one medium (air) to another (solids or water) and therefore are susceptible to leaching into ground water

supplies. These byproduct and liquid discharges are often more toxic in nature than the original materials.

Incinerators equipped with more expensive and advanced air pollution control devices will often transfer toxins such as lead and mercury into its solid and liquid discharges. In one study of a high-temperature incinerator in Italy, 73 percent of the dioxins measured were found in the slag or solid residue. Studies also show that a significant percentage of dioxins released from incinerators are found scrubber wastewater, or in the cake from the filters used to remove dioxin from the air. This is particularly troubling because solid and liquid discharges from incinerators that are put in landfills are not effectively regulated by the EPA.

Incineration of solid waste should not be considered a renewable energy source or advantageous to global warming. The Environmental Protection Agency's eGRID measures the air carbon dioxide emission impacts of electricity generation from technology to technology. Incinerators emit more carbon dioxide per megawatt-hour than coal-fired power plants. According to the EPA the average carbon dioxide air emission rates in the United States from municipal solid waste-fired generation are the highest at 2988 lbs/MWh of as compared to 2,249 lbs/MWh from coal fired plants.

These carbon dioxide emissions and other air pollutants often fall on parks and playing fields, farm crops and dairy pastures, working their way into the food chain. For example, dioxins falling with carbon dioxide biomagnify, meaning that they are passed up the food chain from prey to predator, concentrating in meat and dairy products, and, ultimately, in humans. Although the most lethal impacts of incinerators are to those that live nearest to them, toxins like dioxin can be carried long distances and can persist in the environment for decades. High levels of dioxins have also been found in food and dairy products produced near incinerators, demonstrating that the insidious toxic impacts of incinerators are thus as far-reaching as the shipment of that food to other communities.

Another reason for our support of SB 514 recognizes the importance and necessity of protecting our 'viewsheds' while preserving our national history and protecting a community legacy. For example, the Washington-based Civil War Preservation Trust, the largest nonprofit battlefield preservation organization in the US acts as a watchdog for development around battlefields across the nation. In the last three years the group warned that current developments regarding the sighting of an incinerator in Frederick County have put the Monocacy National Battlefield on its list of the nation's most endangered battlefields. Unfortunately, this is not a new phenomenon as viewsheds surrounding some of our country's most precious historical places and monuments are being endangered by rapid growth and development throughout the country. In town after town the organization has seen the irreplaceable battlefields that define communities and American history being marred forever. The sight of an incinerator smokestack as part of any viewshed would permanently degrade the experience of visiting a battlefield or national park.

To date six (6) States; Delaware, Iowa, Louisiana, Massachusetts, Rhode Island and West Virginia, have one form or another of a ban or moratorium on incineration. In 1997 Maryland prohibited construction of municipal waste incinerators within one mile of an elementary or secondary school. In 2001 Anne Arundel County banned solid waste and medical Waste incinerators. While, in 1988, the Prince George's County Council, expressing concern over the environmental risks of burning the county's trash rejected plans to build a large-scale incinerator.

Today, sustainability, recycle and reuse are front and center of community issues. Both citizens and industry better understand the cost and harmful effects of green house gases and the concept of the carbon footprint. They understand that mass burn incinerator

technology belongs to a bygone era evidenced and communities are unwilling to accept the health, environmental and quality of life liabilities of incineration.

Clean Water Action has advocated for and established that alternative plans to incineration, having the opportunity for consideration, have resulted in communities choosing such alternatives. As communities and cities in the US, Canada and around the world assess and review their solid waste disposal options they have overwhelmingly chosen healthier and more environmentally responsible methods and rejected incineration proposals.

Clean Water Action sees SB 514 as a bill not against establishing incinerators but a bill that will continue to help secure clean air and clean water for Maryland residents and their communities.

Thank you for hearing this testimony and we ask you to vote favorably on Senate Bill 514.

Respectfully,
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