



Maryland Chapter

7338 Baltimore Avenue, Suite 102  
College Park, MD 20740-3211

**Committee: Economic Matters**  
**Testimony on: HB438 - “Renewable Energy Portfolio Standard - Eligible Sources”**  
**Position: Support**  
**Hearing Date: February 20, 2020**

We urge a favorable report from this Committee. The Maryland Sierra Club is a strong and long-time proponent of Maryland ending its subsidy for electricity generation from trash incineration, by removing trash incineration as an eligible source in our state’s Renewable Portfolio Standard (RPS).

The RPS is among our state’s most important programs for substantially reducing our emissions of climate-disrupting greenhouse gases. As a result of the RPS, Maryland has been turning – albeit too slowly – toward electricity generated by clean, renewable energy sources like solar and wind.<sup>1</sup>

As presently designed, however, the RPS also incentivizes the use of energy from trash-burning, treating it the same as solar and wind. The process of burning trash for disposal has, as a byproduct, the generation of a modest amount of electricity.

Trash incineration does not belong in the RPS. Trash incineration is not clean or environmentally neutral – it emits climate-disrupting CO<sub>2</sub> and other pollutants which cause serious damage to Marylanders’ health. The RPS should be focused on incentivizing new, renewable energy facilities which will support Maryland’s efforts to mitigate climate change. Yet both the trash incinerators in Maryland supported by the RPS began operations well before the RPS’s first compliance year, which was 2006. The Covanta incinerator in Dickerson, MD began commercial operation in 1995, and the Wheelabrator incinerator in downtown Baltimore began operation in the 1980s. Maryland’s RPS dollars also have been supporting a Covanta incinerator in Fairfax County, Virginia, which began commercial operations in 1990.<sup>2</sup> There is no indication that these facilities require the RPS subsidy to order to remain in operation.

Maryland can fill all of its renewable energy requirements using clean, affordable energy that does not spew toxic substances into our air or release CO<sub>2</sub>. The 2019 Clean Energy Jobs Act will substantially increase the amount of home-grown electricity Maryland consumes, by supporting large increases in solar

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<sup>1</sup> The RPS has played a key role in the development of Maryland’s solar industry. The RPS’s solar carve-out – which requires Maryland’s electricity suppliers to purchase a certain minimum amount of solar Renewable Energy Credits (RECs) associated with solar energy generated in Maryland – has helped solar generation in Maryland grow from near zero around the time the RPS was enacted to just under 800 megawatts. However, 2017 data show that solar still constitutes only about three percent of electricity generated in Maryland.

Maryland’s RPS, in combination with similar RPS mechanisms in other states, also has played an important role in the growth of the wind industry. As the wind industry was beginning to grow in the early 2000s, these programs helped put onshore wind on a more stable, independent foundation. In addition, Maryland has the potential to obtain abundant electricity from offshore wind. With the Public Service Commission’s approval of two offshore wind projects which are to be supported by offshore wind RECs, Maryland is on the cusp of beginning to take advantage of this untapped clean energy resource. As with solar, this is a good start, but wind energy – almost entirely from outside the state - today still only constitutes about four percent our state’s electricity consumption.

<sup>2</sup> According to the 2019 Renewable Energy Portfolio Report issued by the Maryland Public Service Commission, reporting data for 2017, the three incinerators had the following percentage shares of retired trash incineration RECs in 2017: Dickerson, 44%; Baltimore, 34%; and Fairfax County, 22%.

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and offshore wind over the next decade. More broadly, the state's Greenhouse Gas Emissions Reduction Act establishes the goal of reducing our greenhouse gas emissions by 40% (compared to the 2006 level) by 2030. Using hundreds of thousands of RECs and millions of dollars to support trash incineration will not help us do that.

Incineration facilities typically emit more CO<sub>2</sub>, dioxin, mercury, nitrogen oxide, and lead than fossil fuel plants. Their residual ash contains high concentrations of harmful toxins including dioxin, mercury, lead, and other heavy metals; these high concentrations rapidly leach into local soil and water.

The trash incinerator in downtown Baltimore is a major threat to the health of the city's residents, producing 36% of all industrial air pollution in Baltimore. It is the source of 93% of the mercury and 78% of the lead – both known to be critical threats to children's neurologic development. It also is the city's single largest source of pollutants that cause respiratory disease, producing a staggering 80% of the sulfur dioxide and 57% of the nitrogen oxides (NO<sub>x</sub>).<sup>3</sup> Sulfur dioxide triggers acute respiratory irritation, triggering immediate worsening for anyone with an underlying pulmonary disorder, such as COPD.<sup>4</sup> Nitrogen oxides contribute to childhood asthma and are the major source of ground-level ozone (smog) formations that trigger asthma attacks.<sup>5</sup>

For all these reasons, we recommend that you give this bill a favorable report.

Darian Unger, Ph.D.  
Energy Committee Chair  
DWUnger@Howard.edu

Josh Tulkin  
Chapter Director  
Josh.Tulkin@MDSierra.org

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<sup>3</sup> EPA, National Emissions Inventory data (2014).

<sup>4</sup> EPA, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects> (Nov 2018).

<sup>5</sup> EPA, Ozone and Your Patients' Health - Health Effects of Ozone in Patients with Asthma and Other Chronic Respiratory Disease. <http://www.epa.gov/apti/ozonehealth/effects.html> (updated Jan 2015); EPA, <https://www.epa.gov/no2-pollution/basic-information-about-no2#Effects> (Nov 2018).

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