

Maryland-Delaware Solid Waste Association
a chapter of the



TO: The Honorable Kumar P. Barve, Chair
Members, House Environment and Transportation Committee
The Honorable Stephanie Smith

FROM: Pamela Metz Kasemeyer
J. Steven Wise
Danna L. Kauffman
Richard A. Tabuteau

DATE: February 26, 2020

RE: **OPPOSE** – House Bill 1032 – *Solid Waste Management – Refuse Disposal Systems – Incinerators, Scrap Tires, and Local Authority*

The Maryland Delaware Solid Waste Association (MDSWA), a chapter of the National Waste and Recycling Association, is a trade association representing the private solid waste industry in the State of Maryland. Its membership includes hauling and collection companies, processing and recycling facilities, transfer stations, and disposal facilities. MDSWA and its members **oppose** House Bill 1032.

House Bill 1032 prohibits the Secretary of the Environment from issuing a permit to install, materially alter, or materially extend an incinerator for disposal of a solid waste stream. The bill also (1) prohibits a person from incinerating scrap tires; (2) prohibits a person from storing scrap tires in the State to be used as fuel in an approved resource recovery incinerator or as a tire-derived fuel in an approved facility; (3) requires the Maryland Environmental Service (MES) to modify its scrap tire recycling system to prioritize entities that use scrap tires for retreading; and (4) prohibits MES from including approved facilities that use tires as a fuel substitute or as a tire-derived fuel in its scrap tire recycling system. A political subdivision may adopt an ordinance, resolution, law, or rule to regulate refuse disposal systems or solid waste if the rules are as stringent as those developed by the Maryland Department of the Environment (MDE).

First, MDE requires multiple permits “to materially alter” an incinerator for the control and improvement of air quality standards. It is fairly incomprehensible why any piece of legislation would want to prevent issuance of such permits. Second, none of the provisions of this bill adequately appreciates the complexity involved in the management of scrap tires. Scrap tires are used as fuel because of their high heating value but have a lower greenhouse gas impact since they are partly made from a natural rubber derived from trees. Scrap tires provide a cleaner, more economical fuel alternative to coal in cement kilns, pulp and paper mills, and electric utility boilers. It is better to recover the energy from a tire rather than landfill it.

As such, MDSWA urges the House Environment & Transportation Committee to give House Bill 1032 an unfavorable report.

For more information call:

Pamela Metz Kasemeyer
J. Steven Wise
Danna L. Kauffman
Richard A. Tabuteau
410-244-7000