

**Testimony by Frazier Blaylock
Before the House Economic Matters Committee
In Opposition to HB 166
March 7, 2024**

Good afternoon, my name is Frazier Blaylock and I work for Covanta Energy, which has provided reliable, cost-effective materials management and the generation of clean, renewable energy for Montgomery County since 1995. We operate the County's waste transfer station at Shady Grove and the waste-to-energy facility that the County owns in Dickerson.

I am here today to express our opposition to HB 166, which would remove waste-to-energy (WTE) from Tier 1 of Maryland's Renewable Portfolio Standard (RPS). The elimination of waste-to-energy as a Tier 1 renewable source would ignore the many benefits this facility brings to our communities and treat it unfairly in the very competitive energy and disposal markets.

WTE is a clean, local, efficient, and economical form of renewable baseload energy production and post-recycled waste disposal that helps Maryland divert waste from landfills while producing energy to reduce our reliance on fossil fuels. The Montgomery plant generates enough electricity to power 30,000 homes for a year, or power 75,000 electric cars for a year. These plants can be located close to population centers where trash is generated, and thus avoid the long-haul truck traffic associated with most landfill sites.

Montgomery County sets a sustainable example for other Counties in Maryland by taking care of our own trash. We do not export our municipal solid waste to other states' landfills, but rail it from Shady Grove out to Dickerson avoiding hundreds of trash trucks from traveling our highways. Our neighbors in Frederick County, for example, transport 96% of their

waste by trailer trucks to a private landfill in Chambersburg, PA. This is according to the County's own website.

The process of converting waste into energy is a key part of an integrated materials management plan that focuses on waste reduction, reuse, recycling, and recovery of energy.

The revenues, employment, and labor earnings derived from managing waste, producing energy, and recycling metals are the direct economic benefits of WTE.¹ Employees at WTE plants are technically skilled and are compensated at a high average wage. WTE facilities provide stable, long-term, well-paying jobs, while simultaneously infusing dollars into local economies through the purchase of local goods and services.

A study of WTE technologies by the Joint Institute for Strategic Energy Analysis for the U.S. Department of Energy concluded that WTE is a "refined, clean, well-managed application for energy production."² WTE meets the two basic criteria for establishing what a renewable energy resource is—its fuel source (trash) is *sustainable* and *indigenous*. WTE facilities recover valuable energy from trash after efforts to "reduce, reuse, and recycle" have been implemented by households and local governments.

The facilities we operate are internationally recognized as GHG mitigation tools, even after accounting for our stack emissions of fossil-based CO₂. The IPCC called waste-to-energy a "key GHG mitigation measure." This is done by diverting degradable organics from landfills, the 3rd largest source of methane globally and in the United States, displacing grid connected fossil-fuel fired electrical generation, and recovering metals for recycling. Alongside recycling, WTE has been a cornerstone of Europe's efforts to reduce GHG emissions from the waste management sector.

Our GHG benefits relative to landfilling have been recognized by California's air and waste regulatory agencies, U.S. EPA scientists, Columbia University's Earth Engineering Center, U.S. EPA, the Obama Administration's Clean Power Plan, the World Economic Forum, and the

² Joint Institute for Strategic Energy Analysis. 2013. Waste Not, Want Not: Analyzing the Economic and Environmental Viability of Waste-to-Energy (WTE) Technology for Site-Specific Optimization of Renewable Energy Options. Technical Report NREL/TP-6A50-52829.

Joint Institute for Strategic Energy Analysis (“NREL”). EPA scientists, in a prominent peer reviewed paper, concluded WTE facilities reduce GHG emissions relative to even those landfills equipped with energy recovery systems.³ EfW facilities generate carbon offsets credits under both the Clean Development Mechanism (CDM) of the Kyoto Protocol and voluntary carbon offset markets.^{i,ii} The Montgomery facility avoids 442,000 metric tons of GHGs each year, which is equivalent to removing 109,000 vehicles for 1 year or displacing 546 million pounds of coal.

The benefits of diverting waste away from landfills to recycling and energy recovery are clearer than ever. Across a series of recent studies employing direct measurement of methane plumes via aircraft downwind of landfills, actual measured emissions from landfills have averaged twice the amount reported in GHG inventories, including Maryland’s.

Furthermore, Maryland’s inventory downplays methane’s role in the climate, using an outdated methane GWP. Today, scientists recognize methane as a potent short-lived climate pollutant that is more than 30 times stronger than CO₂ over 100 years, and 84 times stronger over 20 years, when all of its impacts are considered.ⁱⁱⁱ States currently leading on climate, like New York and California, have adopted methane’s 20-year GWP in planning and legislation.

Finally, to remove WTE from Tier one and yet leave landfill gas in Tier 1 is counter to the US and EU waste hierarchies and counter to Maryland’s goal of reducing the GHG’s that contribute to climate change.

For the reasons stated in this testimony, Covanta strongly opposes HB 166. Thank you for your consideration of these remarks.

ⁱ Clean Development Mechanism: *Large-Scale Consolidated Methodology: Alternative waste treatment processes, ACM0022*. Available at: <https://cdm.unfccc.int/methodologies/PAmethodologies/approved>

ⁱⁱ Verified Carbon Standard Project Database, <http://www.vcsprojectdatabase.org/> See Project ID 290, Lee County Waste to Energy Facility 2007 Capital Expansion Project VCU, and Project ID 1036 Hillsborough County Waste to Energy (WtE) Facility 2009 Capital Expansion Unit 4.

ⁱⁱⁱ The IPCC concluded that “it is likely that including the climate-carbon feedback for non-CO₂ gases as well as for CO₂ provides a better estimate of the metric value than including it only for CO₂.” See p714 & Table 8-7 of Myhre, G. *et al.* (2013)

Anthropogenic and Natural Radiative Forcing. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Stocker, T.F., et al. (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. https://www.ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5_Chapter08_FINAL.pdf