



SB253

**Controlled Hazardous Substance Facility Permit – Research Facilities –
Chemical Warfare Material Requirements**

Environment and Transportation Committee

March 26, 2025

Position: Unfavorable

Dear Chair Korman and Members of the Committee,

Clean Water Action is deeply concerned by SB253 and urges you not to pass this legislation.

SB253 exempts the incineration of chemical warfare materials at a “research facility” from specific Maryland controlled hazardous substances statutory and regulatory requirements if the incineration is done for “research, development, and demonstration” purposes. With amendments added in the Senate, the bill now sets up a new “research, development, and demonstration permit” for such activities.

While this is an improvement from the bill as introduced, we still have several concerns.

- Significantly, the definition of “research facility” is left to the discretion of the U. S. Department of Defense, which leaves Maryland residents vulnerable to federal decisionmaking at this uncertain time.
- There is no upper limit on the quantities of chemical warfare materials or levels of emissions stated in the bill.
- Comments from proponents at prior hearings on this bill indicated that chemical warfare incineration research would be conducted at Aberdeen Proving Grounds, which is in close proximity to residential communities.

Residents surrounding Aberdeen Proving Grounds have fought in past decades against incineration of chemical warfare materials and other materials in their community. Clean Water Action encourages the committee to exercise caution about this proposed legislation and the activities it might authorize at Aberdeen or elsewhere.

Thank you,

Jennifer Kunze

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