



Committee: Environment and Transportation
Testimony on: SB253 - Controlled Hazardous Substance Facility Permit - Research Facilities - Chemical Warfare Material Requirements
Organization: Maryland Legislative Coalition Climate Justice Wing
Submitting: Dave Arndt, Co-Chair
Position: Unfavorable
Hearing Date: March 26, 2025

Dear Chair and Committee Members:

Thank you for allowing our testimony today in opposition of SB253. The Maryland Legislative Coalition Climate Justice Wing, a statewide coalition of nearly 30 grassroots and professional organizations, urges you to vote unfavorably on SB253.

We are opposed to any new incinerator in Maryland because of the following:

- **Health concerns:** Incinerators release pollutants into the air, water, and food supply, which can increase the risk of cancer, birth defects, and other health issues.
- **Environmental impact:** Incinerators have a large carbon footprint and can undermine Maryland's greenhouse gas goals and efforts.
- **Discrimination:** Incinerators often disproportionately impact Black, Hispanic and low-income communities.

SB253 seeks to amend existing law regarding incineration of chemical warfare waste (cww) exempting from current permitting requirements anything the Department of Defense labels "research, development, or demonstration." We must also ask why is this bill being put forward that would allow incineration of dangerous and in some cases carcinogenic chemical warfare wastes in Maryland? Beyond the included amendments to the bill the following safety regulations need to be explicitly included in the bill language and not left to the Maryland Department of the Environment to interpret:

1. Complying with Federal and State toxic air pollution standards,
2. Achieving a destruction and removal efficiency of >99.9%,
3. Developing a plan for protecting persons in the largest area at risk from a worst-case scenario release,
4. Presenting such a plan to the public and local affected governments,
5. Considering safer alternatives to incineration as well as moving to a less populated disposal site to create less risk of release or harm,

6. Monitoring data regularly, continuously, and conducting a review by a qualified independent third party as well as reporting to the Department of the Environment; made available to the public through a website and not subject to a PIA.
7. Specifying in the permit the quantity of material to be incinerated which cannot be modified, and
8. Dismantling the facility according to state and federal standards once the permitted quantity of cww has been destroyed.

There is no justification for why incineration of chemical warfare waste is even being requested or why any of the commonly used alternatives are not acceptable. We need some transparency here before allowing a bill that could put Marylanders and the environment at risk without any apparent benefit.

For all of these reasons, we strongly oppose SB253 and urge a **UNFAVORABLE** report in Committee.

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Adat Shalom Climate Action

Cedar Lane Unitarian Universalist Church Environmental Justice Ministry

Chesapeake Earth Holders

Chesapeake Physicians for Social Responsibility

Climate Parents of Prince George's

Climate Reality Project

ClimateXChange – Rebuild Maryland Coalition

Coming Clean Network, Union of Concerned Scientists

DoTheMostGood Montgomery County

Echotopia

Elders Climate Action

Fix Maryland Rail

Glen Echo Heights Mobilization

Greenbelt Climate Action Network

HoCoClimateAction

IndivisibleHoCoMD

Maryland Legislative Coalition

Mobilize Frederick

Montgomery County Faith Alliance for Climate Solutions

Montgomery Countryside Alliance

Mountain Maryland Movement

Nuclear Information & Resource Service

Progressive Maryland

Safe & Healthy Playing Fields

Takoma Park Mobilization Environment Committee

The Climate Mobilization MoCo Chapter

Unitarian Universalist Legislative Ministry of Maryland

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