



TO: The Honorable Dereck E. Davis, Chair
Members, House Economic Matters Committee
The Honorable Julian Ivey

FROM: Richard A. Tabuteau

DATE: February 4, 2021

RE: **OPPOSE** – House Bill 332 – *Renewable Energy Portfolio Standard – Eligible Sources*

On behalf of Wheelabrator Technologies and Wheelabrator Baltimore (Wheelabrator), we submit this letter of **opposition** to House Bill 332 because it removes waste-to-energy as a Tier 1 renewable energy source from the Renewable Energy Portfolio Standard (RPS). Such a change would have a significant negative impact on Wheelabrator, our customers such as the City of Baltimore and Baltimore County, and the State’s ability to reach its own renewable energy goals.

Wheelabrator is an integral part of Maryland’s energy, environmental, and economic infrastructure, providing sustainable waste management for the City of Baltimore and Baltimore County. Every day, we divert waste from landfills to safely convert up to 2,250 tons of post-recycled waste from area homes and businesses into 330,392 (net) megawatt hours of clean, renewable baseload electricity – enough to power ~40,000 Maryland homes, while reducing landfilling, lowering greenhouse gases (GHG) and recycling ~12,000 tons of metals that would also otherwise be landfilled. Last year, Wheelabrator’s renewable energy generation offset the need for ~718,100 barrels of oil, ~209,300 tons of coal or 2,800 million cubic feet of natural gas. Energy-from-waste reduces GHG by approximately 1 ton for every three tons of waste processed. In addition, Wheelabrator generates “green steam” for downtown Baltimore’s heating and cooling system, which services 255 businesses, including the M&T Bank Stadium, home of the Baltimore Ravens. Over 50 percent of the steam delivered to these local businesses is produced by converting post-recycled household waste into energy at Wheelabrator. Green steam from Wheelabrator reduces Baltimore’s total GHG by approximately 47,000 tons per year – the equivalent of removing 8,400 cars from the road.

Energy-from-waste has been endorsed by the U.S. Environmental Protection Agency under the Obama-Biden Administration as the preferred method to landfilling for waste disposal. In fact, it’s embraced by the European Environmental Agency, the Center for American Progress, the World Economic Forum, the Intergovernmental Panel on Climate Change, Kyoto Protocol’s Clean Development Mechanism, and the United Nations Environment Programme, among many others. Thirty-one states, the District of Columbia, and two territories have defined energy-from-waste as renewable energy in various state statutes and regulations, including renewable portfolio standards. Moreover, Baltimore City’s 2020 “Less Waste, Better Baltimore” Master Plan recommends continued utilization of energy-from-waste because the alternative of long-haul trucking is “a cost-prohibitive and environmentally degrading option.” As such, Maryland would become a national outlier by removing waste-to-energy from the renewable portfolio standards.

Wheelabrator Baltimore will invest more than \$40 million in air quality controls to ensure that, by 2023, the facility will have some of the lowest emissions limits of any energy-from-waste facility anywhere in the United States. It will also continue to aggressively invest in maintenance for all areas of the facility to

ensure its continued high reliability, safety and efficiency well into the future. The company will also continue to invest in new technologies and equipment to ensure the facility operates within strict state and federal guidelines designed to protect the environment and public health. **Moreover, Wheelabrator has committed to making \$750,000 in annual contributions for the next decade to Baltimore City community and environmental initiatives.**

Emissions	Units	Baltimore Clean	Montgomery County	Wheelabrator Baltimore	
		Air Act	Permit Limits	Current	Future
NOx	ppm	45	105	145	105
SO2	ppm	18	29	29	18
Dioxins	ng/dscm TEQ	2.6	No TEQ-based limit	0	2
Dioxins	ng/dscm	0	30	35	15
Mercury	ug/dscm	15	50	50	15
Cadmium	ug/dscm	0	35	35	25
Lead	ug/dscm	0	400	400	250

In their December 2017 report, the Environmental Integrity Project, funded by the Abell Foundation, reported that “on-road vehicles are the largest contributor to the air pollution that people breathe in Baltimore...because vehicle tailpipes...do not disperse pollution as widely as taller smokestacks.” They also reported that “there is not a significant association between city zip codes with the highest emissions of criteria pollutants from stationary facilities and the zip codes with the highest asthma rates.” A new 2020 study by the Abell Foundation confirms that social determinants of health are a primary driver of asthma in Baltimore City. It found, “The link between environmental exposures and asthma symptom burden is clear: Children are more likely to experience asthma exacerbations if they live in areas with high rates of housing code violations or if they are exposed to high levels of allergens or environmental triggers in the home. Research indicates that more than 84% of homes of children with asthma in Baltimore City contain detectable levels of mouse allergens in bedroom dust and air samples.”

As reflected in the December 2019 Report of the Maryland Power Plant Research Program, Figure ES-11, Wheelabrator is an important economic engine to the region – providing jobs, economic stimulus in the form of capital investments and the purchase of goods and services, local property taxes, and we remain actively engaged in a series of community, environmental, economic initiatives spending tens of millions in the region annually. Maryland-based energy-from-waste sources (*i.e.* MSW in Figure ES-11), more so than any other Maryland-based source by a multiple of at least 3, are used to comply with the RPS.

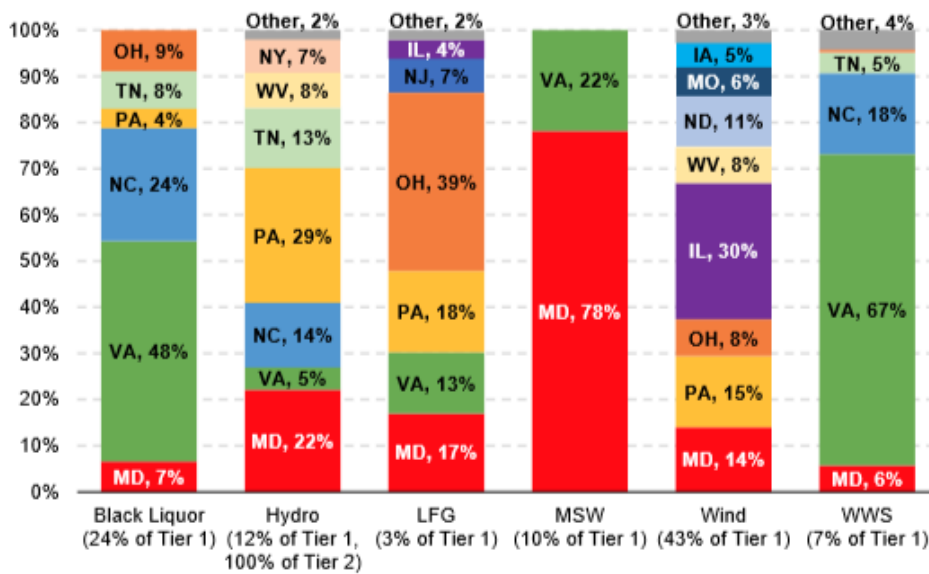


Figure ES-11. Percentage of RECs Generated in Each State Used for Compliance with the Maryland RPS, by Fuel Source (2017)

Source: Maryland PSC 2018 *Renewable Energy Portfolio Standard Report*.

Note: The percentages under each fuel category reflect each fuel type’s share of Maryland RPS compliance for 2017.

As you consider House Bill 332, we hope you will recognize the tremendous environmental and economic benefits Wheelabrator provides to Maryland. The elimination of energy-from-waste as a Tier 1 renewable energy source will adversely affect the continued viability of Wheelabrator, but also Maryland’s ability to meet its high RPS goals. Renewable energy credits help the facility continue to provide affordable and dependable disposal services to the City and the County, while promoting and supporting recycling, diverting waste from landfills, and reducing GHG. We urge the House Economic Matters Committee to give House Bill 332 an unfavorable report.

For more information call:

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