

TESTIMONY OF LISA M. POLYAK
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SUPPORTING SB893 - SENATE EDUCATION, ENERGY AND ENVIRONMENT COMMITTEE HEARING
FEBRUARY 27, 2024

Senator Feldman, Senator Kagan, and Members of the Committee,

Thank you for the opportunity to testify. I am an environmental engineer and public health scientist. For the last 35 years I have worked for the Army Medical Command and the Defense Health Agency evaluating environmental health exposures for U.S. Servicemembers stationed in the US and around the world. Today, I am appearing in a private capacity as the Science Advisor to the York Road Partnership in Baltimore.

I urge a favorable vote for SB893.

I want to make 4 points about why this bill is good science and good policy.

1. Demand for cremation has risen dramatically in the last 20 years due to necessity and cost. The Maryland State Funeral Directors Association reports that 52% of Marylanders needing after-death care chose cremation rather than burial. This demand is reflected in the **116 air permits issued for crematory incinerators by the Maryland Department of the Environment** (MDE). According to MDE records, air permit applications for human crematories have doubled in the last 10 years in Maryland.
2. There are no Federal air quality regulations governing the operation of crematory incinerators; and **MDE regulations on crematories have not been updated in over 30 years** (since 1991). Further, having reviewed a majority of the crematory air permits issued by MDE – I can tell you that there are no permit obligations to perform a stack test or to measure stack emissions to identify what kinds of pollutants are emitted, or to measure whether emissions meet the lone crematory emission standard for particulate matter that appears in COMAR.
3. Unlike regular incinerators, **crematory incinerators have no emission controls**, and **no monitors that measure how much pollution comes out of the exhaust stack**. The only optional device that some crematories are equipped with is a smoke detector – like the kind you have in your kitchen – that alarms when smoke in the exhaust stack is too dark or too dense.
4. Opponents of this bill state that cremation poses no health risks – that the stack exhaust only contains carbon dioxide and water vapor. We know that this is not true because the American Medical Association estimates that **10% of Americans have a medical device implanted in their body during their lifetime**. Things like pacemakers, defibrillators, drug dispensers, vascular stents, synthetic joints, prosthetic limbs, cosmetic implants and dental fillings which are not removed before cremation. Opposition testimony to this bill cites a report by the Cremation Association of North America stating,

“Additionally there may be pieces of metal in the cremated remains – this metal may come from surgical implants like hip replacements, dental fillings, casket handles, or jewelry that was not removed prior to cremation”.

Crematories are processing much more than just human remains. **Crematories are not designed to incinerate these materials – and because of the lack of pollution control – will just emit the partially burned remnants of these devices in the stack exhaust and out into the neighborhoods surrounding the incinerator.**

Because of the lack of updated regulations, the lack of emission control and monitoring, and the increasing presence of medical devices and synthetic materials during cremation – a setback from homes and vulnerable populations is a simple, no cost protection for public health that permits the cremation industry to continue to provide a valuable service.