TO: The Honorable Brian J. Feldman, Chair

Members, Senate Education, Energy, and the Environment Committee

The Honorable Bil Ferguson, President of the Senate

FROM: Mary Urban

DATE: February 13, 2025

RE: **OPPOSE** – Senate Bill 0010 – *Renewable Energy Portfolio Standard – Eligible Sources – Alterations (Reclaim Renewable Energy Act of 2025)*

On behalf of WIN Waste Innovations and our Baltimore facility (WIN Waste), we submit this letter of **opposition** to Senate Bill 10 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 WIN Waste, our waste management customers, including the City of Baltimore, our local vendors and subcontractors and the State's ability to reach its own goals relating to, greenhouse gas (GHG) reduction, and investment in renewable energy and in-state energy generation.

WIN Waste 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 annually convert nearly 800,000 tons of post-recycled waste from area homes and businesses into 340,000 megawatt hours of clean, renewable baseload electricity – enough to power ~31,000 Maryland homes, while reducing landfilling, lowering GHG, recycling ~12,000 tons of metals that would also otherwise be landfilled and offsetting the need for nearly 650,000 barrels of oil.

During the summer of 2023, WIN Waste completed more than $45 million in upgrades to its Baltimore WTE facility, ensuring its emissions are among the lowest of any such facility in the world. As you can see below, the WIN Waste Baltimore facility emissions are well below the EPA, the more restrictive MDE and the most restrictive Baltimore City standards. The company will 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. WIN Waste 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, the company will continue to invest nearly $1 million annually to Baltimore City community and environmental initiatives.**

Our emissions are below the U.S. EPA standards, the more restrictive Maryland state standards, and the most restrictive Baltimore City standards for protection of human health and safety.

EMISSION	UNITS	U.S. EPA STANDARDS	MARYLAND STANDARDS	BALTIMORE STANDARDS (voluntarily reduction)	WIN WASTE 2024 PERFORMANCE	WIN WASTE DIFFERENCE
NOx	ppm	205	145	105 (voluntarily reduced)	101	**30% below**
SO2	ppm	29	29	18	11	**62% below**
Dioxins	ng/dscm	35	30	15	2	**93% below**
Mercury	ug/dscm	50	50	15	0.5	**99% below**
Cadmium	ug/dscm	35	35	25	0.4	**98% below**
Lead	ug/dscm	400	400	250	5.6	**99% below**

Energy-from-waste reduces GHG by approximately 1.3 tons for every ton of waste processed. In addition, WIN Waste 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. It is essential that the committee take a holistic look at the objectives of the RPS and the broad and ongoing role of WTE, which results in a net reduction of GHG in multiple ways and incentivizes in-state, non-fossil fuel generation.

WTE is one of the few renewable energy sources primarily generated in Maryland. According to the 2022 RPS Annual Report, the majority of Maryland's RPS obligations were met through the purchase and retirement of renewable energy credits (RECs). Only 19 percent of the RECs used for compliance in 2021 came from in-state sources, with WTE representing most of that portion. In fact, in 2022, Maryland ratepayers sent hundreds of millions of dollars out of state to landfills, poultry-waste facilities and more. In the same year, Illinois landfills received $3.6 million of Maryland ratepayer money from Tier 1 status.

Energy-from-waste has been endorsed by the U.S. Environmental Protection Agency 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. More than 30 states recognize waste to energy as renewable energy.

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." In fact, the master plan and other analyses have estimated eliminating WTE from the local waste management process would cost taxpayers as much as $100 million over several years. That amount would include expanding local landfill capacity and building truck and rail transfer stations to transport an increased volume of waste to out-of-state disposal sites.

In its 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

As Maryland waste volumes continue to increase, jurisdictions are already hauling waste to out-of-state landfills using tractor trailers. This additional tractor-trailer traffic, which increases air pollution and fossil-fuel usage, will continue to grow if less waste is safely and responsibly managed locally. According to the Maryland Department of the Environment, nearly 14 million tons of waste was generated in Maryland counties and the City of Baltimore during calendar year 2021, up 19.3 percent from the roughly 11.6 million tons generated in calendar year 2020. WTE plays an essential role in reducing the volume of waste filling local landfills and being trucked to distant disposal sites.

A 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, WIN Waste's Baltimore facility 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 and economic initiatives spending tens of millions in the region annually.

As you consider Senate Bill 10, we hope you will recognize the tremendous environmental and economic benefits WIN Waste provides to Maryland. The elimination of energy-from-waste as a Tier 1 renewable energy source will adversely affect the continued viability of WIN Waste, 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. Jeopardizing and disadvantaging one of Maryland's essential in-state generators at a time when the State faces significant challenges with energy reliability and affordability is counter-productive to the State's broader energy and climate goals.

For all these reasons, Win urges the Senate Education, Energy, and the Environment Committee to give Senate Bill 10 an unfavorable report, and stands ready to work with President Ferguson and the Committee to develop a renewable energy strategy that benefits Maryland ratepayers, workers, and generators.