



Committee: Environment and Transportation

Testimony on: HB62-Controlled Hazardous Substance Facility Permit – Research Facilities – Chemical Warfare Material Requirements

Position: Unfavorable

Hearing Date: January 29, 2025

*Chesapeake Physicians for Social Responsibility (CPSR) is a statewide evidence-based organization of over 900 physicians and other health professionals and supporters that addresses existential public health threats: nuclear weapons, the climate crisis, and the issues of pollution and toxic effects on health, as seen through the intersectional lens of environmental, racial and social justice.*

Chesapeake Physicians for Social Responsibility OPPOSES HB62 in the strongest possible terms. This bill seeks to amend existing law so as to exempt from current permitting requirements chemical warfare materials incinerated at a Department of Defense (DOD) “research facility” if the DOD states that the incineration is done for “research, development, or demonstration” purposes. People in Maryland successfully opposed the incineration of chemical weapons at Edgewood Arsenal/ Aberdeen Proving Ground back in the 1990’s.<sup>1</sup> Located in a densely populated part of the State. they demanded consideration of alternative ways to destroy this dangerous material that needed to be destroyed by international law. They were successful and the Army agreed to neutralization rather than incineration after a national panel agreed that would be satisfactory for the waste at Aberdeen. That work was completed in 2006.<sup>2</sup> Scientists later used neutralization to rid the world of Syria’s deadly sarin gas out at sea and without incineration. The Army announced in 2023 that it had completed destruction of all chemical weapon stockpiles.<sup>3</sup>

Why we must ask is this bill being put forward that would allow incineration of chemical weapons waste in Maryland which is dangerous and some of which is carcinogenic,<sup>4</sup> to resume without safety regulations? Some of the exemptions include:

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<sup>1</sup> . <https://www.baltimoresun.com/1994/02/06/panel-endorses-alternative-to-incinerator-at-aberdeen-2/>

<sup>2</sup> <https://www.peoacwa.army.mil/2024/10/10/facts-u-s-chemical-demilitarization-program-overview/>

<sup>3</sup> [s/Release/Article/3451920/us-completes-chemical-weapons-stockpile-destruction-operations/](https://mgaleg.maryland.gov/2025RS/bills/hb/hb0062F.pdf)

<sup>4</sup> <https://mgaleg.maryland.gov/2025RS/bills/hb/hb0062F.pdf>

- A. Complying with Federal and State toxic air pollution standards
- B. Achieving a destruction and removal efficiency of >99.9%
- C. Developing a plan for protecting persons in the largest area at risk from a worst-case scenario release and
- D. Presenting such a plan to the public and local effected governments
- E. Considering safer alternatives to incineration as well as moving to a less populated disposal site to create less risk of release or harm
- F. Monitoring data regularly, continuously, and reviewed by a qualified independent third party as well as reported to the Department of the Environment.
- G. Specifying in the permit the quantity of material to be incinerated which cannot be modified,
- H. Dismantling the facility according to state and federal standards once the permitted quantity of chemical weapons has been destroyed.

HB62 raises many alarming questions. Why is incineration even being considered now after APG completed destruction of all of its chemical warfare waste using neutralization, not incineration? Why should the legislature remove all safety guardrails on chemical warfare waste incineration in Maryland because it is for “research?” Who is behind this bill and why? If this research is done to figure out how to protect armed forces from a future attack, why does this involve unregulated incineration of dangerous chemical warfare waste, some of which is carcinogenic, in a heavily populated area like Harford County? What does this mean for any Marylander who happens to be downwind when the incineration is happening?

We need some transparency here before allowing a bill that could put Marylanders and the environment at risk without any apparent benefit. This bill should not proceed without answers to legislators and the public to the above questions. With these serious unanswered questions, and the potentially disastrous consequences of incinerating chemical warfare materials in close proximity to residential areas, we strongly OPPOSE HB62 and ask for an UNFAVORABLE report.

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