

February 24, 2025

Dear Environment and Transportation committee members,

My name is Shamioka Preston, my husband, 12-year-old, and 9-year-old have lived in Cedar Creek since 2022.

We moved from California to Columbia due to Howard County's commitment to racial and economic inclusion and the environment.

We left California in part due to years of wildfires affecting our air quality and quality of life. Although we were located hundreds of miles from the wildfires, we were impacted daily during fire season. My husband and I were deeply concerned about the effects of these toxic chemicals on ourselves and our young children. Fast forward to today, we are genuinely concerned about a new, unexpected environmental threat. Our home is 200 feet from the WR Grace facility where they would like to build an "advanced recycling" pilot plant.

It is truly unfortunate that the WR Grace has even gotten this far in their permitting process. They have moved through various processes in the approval chain without any regulators, zoning officials, etc saying, "No Grace, your attempt to burn plastic is way too dangerous to happen near residential homes."

I support HB1058 and HB 1092 for the following reasons:

1. The EPA and MDE have designated WR Grace's pilot plant as a pyrolysis incinerator.¹

In the attached communications between the Maryland Department of the Environment (MDE) the Environmental Protection Agency (EPA), they have officially defined WR Grace's proposed pilot plant as a *pyrolysis incinerator*. To those who live nearby, this is extremely important and pertinent because Grace has repeatedly stated, in [local media](#), [public hearings](#), and on their [website](#), that their pilot plant is **not** an incinerator.

Although the pilot plant meets the applicability criteria for a pyrolysis incinerator, it does not appear that MDE is intending to regulate it as one.

WR Grace's proposal to build an incinerator on their campus, within 200 feet from homes and backyards with kids and other vulnerable groups, should be of grave concern to local residents, elected officials, and the broader Howard County community. Setting this type of precedent could enable other bad actors to build other hazardous facilities in the name of research. Howard County should not allow any company to build any type of incinerator near homes or outside of manufacturing or industrial zones.

¹ See Attachment "Pyrolysisunits-defined.png" - EPA's working definition of Pyrolysis Units from the [Other Solid Waste Incinerators \(OSWI\): New Source Performance Standards \(NSPS\) and Emission Guidelines \(EG\) for Existing Sources](#)

For more details, see attached document named, "Enclosure- WR Grace Reg. Interpretation Signed.pdf", " 25-01482-R03-PAO Walsh.pdf", "Enclosure- OSWI Applicability Determination Request Letter.pdf"

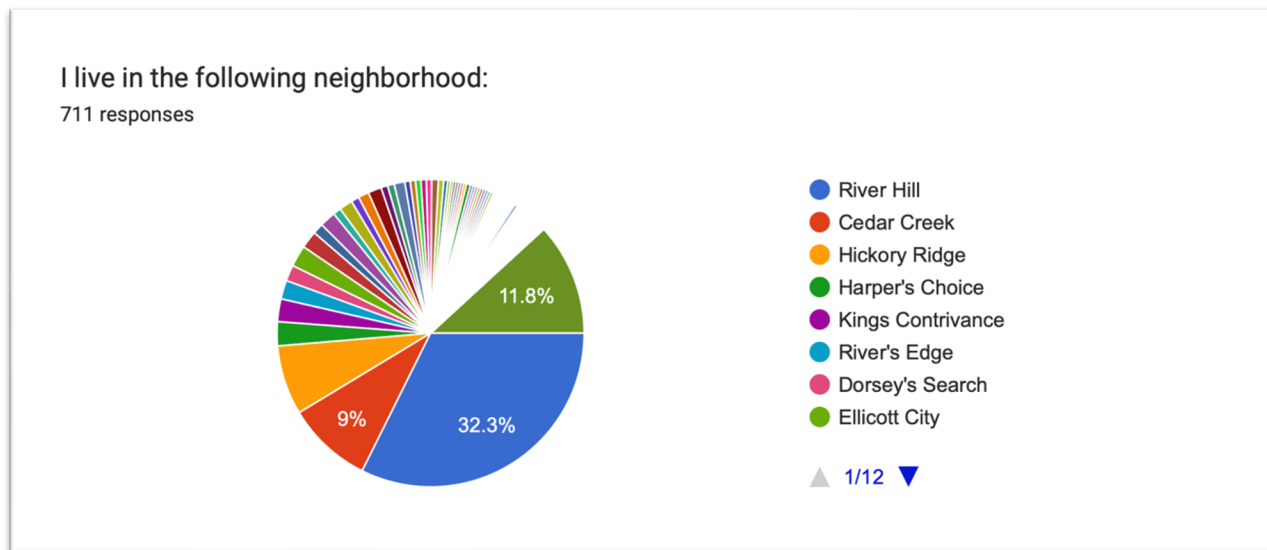
I have spoken to many of the residents who signed petitions, attended hearings, and lent their voices to this cause, we would not have opted to live near WR Grace had we known they intended to build an incinerator (no matter the size nor purpose). My family certainly would not have.

2. Community members are alarmed by the WR Grace pilot plant project.

The Stop Grace grassroots organization created a petition and collected over 700 names of those who oppose Grace’s Pyrolysis Incineration Project. This petition has evolved over time based on growing concern and outreach. Despite the evolution, the message from those who signed is clear and emphatic:

***“...RESPECTFULLY PETITION OUR LOCAL AND STATE OFFICIALS AS WELL AS OUR COUNTY AND STATE AGENCIES TO BLOCK W.R. GRACE FROM CONSTRUCTING AND OPERATING THE PROPOSED PILOT PLANT.*”**

The data extract below demonstrates that the vast majority of respondents live in the communities within a mile of WR Grace (including Cedar Creek, River Hill and Hickory Ridge) with many others neighboring communities within Howard County sharing the same concerns.²



3. An NIH study showed that health risks increase within 1 mile of toxic air emissions

The majority of the concerned petitioners live closest to the WR Grace Project. According to a [2015 NIH Study](#)³ of 1,600 industrial plants with toxic air emissions, there are clear impacts to health and housing

² For more details, see attached document named, “Stop Grace Member Petition_combinedMaster.pdf”

³ Detailed information can be found in the link and attached document named, “[Environmental Health Risks and Housing Values Evidence from 1,600 Toxic Plant Openings and Closings.pdf](#)”

prices in communities that are within 1 mile of a plant emitting toxic air pollutants. A summary of the study and the findings are as follows:

The application of a research design based on more than 1,600 plant openings and closings matched to extraordinarily detailed, geocoded data yields three primary findings. First, on average, toxic air pollutants affect ambient air quality only within 1 mile of the plants, suggesting that health effects from these emissions should be concentrated in this range. The highly localized range differs substantially from particulate matter emissions, which can affect ambient air quality several hundred miles away from their source. Second, the opening of a plant that emits these pollutants leads to a roughly 11 percent decline in housing prices within 0.5 miles, or a loss of about \$4.25 million per operating plant. Housing prices are largely unaffected by a plant closing, implying that toxic plants continue to negatively affect housing prices after they cease operations. Third, the incidence of low birthweight increases by roughly 3 percent within one mile of an operating toxic plant, with comparable magnitudes between 0 and 0.5 miles and 0.5 and 1 miles.

On a personal note, this is one of the most terrifying points for me as a parent and homeowner because my house is approximately 200 feet from Grace's fence line and within line of sight of Building 30, the intended site for the pyrolysis incinerator. My children and my neighbor's children play in our backyards which abut Grace's fence. I am deeply concerned over the potential negative health impacts to my children, visiting relatives, and neighborhood animals (including my 14-month-old dog), waterways, and the broader environment. In addition, wild animals such as deer, foxes and bunnies roam the land between Robinson Nature Center, Cedar Creek, and WR Grace's campus and the Middle Patuxent River runs nearby.

This photo, taken from my front porch on February 14, 2025, is of WR Grace's corporate headquarters located at 7500 Grace Drive, Building 30.



4. WR Grace plans to emit toxic air emissions for most of the day, for more than half of the year, for an unknown number of years.

According to [WR Grace’s Air and Radiation Administration Application for Permit to Construct Docket #16-23](#), they will run their incinerator every hour for 16 hours a day, 5 days a week, and for 50 weeks each year. The below is a screen capture of the page in their permit where they outline the projected schedule.

Describe the emission point including all associated equipment and control devices:
31 of 169put gas stream controlled by thermal oxidizer

3. Emissions Schedule for the Emission Point

Continuous or Intermittent (C/I)?	I	Seasonal Variation Check box if none: <input checked="" type="checkbox"/> Otherwise estimate seasonal variation:	
Minutes per hour:	60	Winter Percent	
Hours per day:	16	Spring Percent	
Days per week:	5	Summer Percent	
Weeks per year:	50	Fall Percent	

In an April 11, 2024, [virtual public hearing \(YouTube video\)](#), hosted by the Maryland Department of the Environment, Grace’s lead scientists on the project stated, “we envision this running primarily between waking hours” for an unknown number of years (see YouTube video linked above, timestamps 32:34 and 1:03:50). The Grace scientists were unable to express an exact number of years, “we expect a fairly long run in terms of the number of years that we will operate this pilot plant.”

This is untenable for folks who have just moved into our homes and especially for those of us with young children who need to be outdoors. As new members to the Cedar Creek community and Howard County as a whole, Grace is severely limiting our enjoyment of our new home and community.

It is unfair that Grace stands to gain with their pilot plant while their closest neighbors are negatively impacted. Grace gets to conduct research every day of the week nearly every week of the year for “4000 hours a year” for an unknown number of years. As a result, neighbors like me, lose access to my outdoor space due to pollution exposure and noise every day of the week, nearly every week of the year, for an unknown number of years.

Additionally, we get to worry about when the toxic air emissions, including, and especially, VOCs will increase our risks of respiratory ailments and cancer.

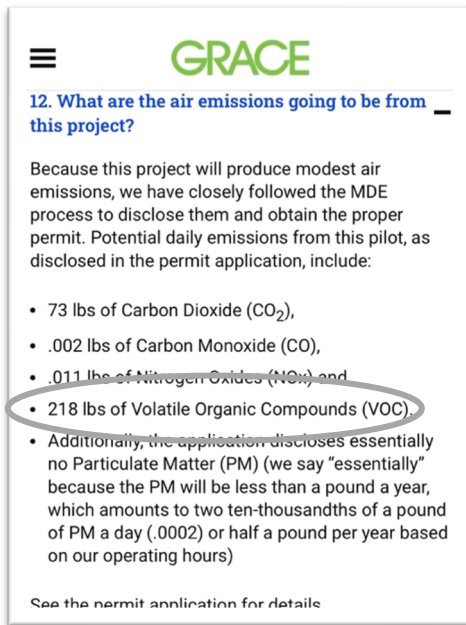
The potential health and safety impacts have already affected our family’s plans. We’ve stopped investing in home improvements projects (which impacts local businesses); we are stressed about whether our neighborhood can weather this storm. Leaving would devastate our family. Staying would destroy our health. These are difficult decisions we shouldn’t have to make 2 years into a new home but the risks of a pyrolysis incinerator so close is too serious to ignore.

5. WR Grace continues to contradict themselves in their documentation. We do not know what to believe and we do not trust them with our safety.

In the case of the pyrolysis incinerator that Grace wants to operate, details matter. I will give you one simple example that highlights this point. In WR Grace’s permit application, they state the number of pounds of anticipated daily VOCs emitted is projected to be **“0.218 lb/day”** (see below screenshot from their Form 5EP submission).

FORM 5EP: Emission Point Data				
6. Estimated Emissions from the Emission Point				
Criteria Pollutants	At Design Capacity (lb/hr)	At Projected Operations		
		(lb/hr)	(lb/day)	(ton/yr)
Particulate Matter (filterable as PM10)		0.000	0.000	0.000
Particulate Matter (filterable as PM2.5)		0.000	0.000	0.000
Particulate Matter (condensables)				
Volatile Organic Compounds (VOC)		0.014	0.218	0.027
Oxides of Sulfur (SOx)				
Oxides of Nitrogen (NOx)				
Carbon Monoxide (CO)				
Lead (Pb)				

As recently as Sunday, February 16, 2025, their [website, intended to explain the pilot project](#), stated that **“218 lb/day”** of VOCs would be emitted -- **a 1,000x difference**. (see below screenshot from their website).



A missed “comma or period” can be catastrophic. This is just one example of the carelessness and contradictions around what Grace has communicated regarding this plant and its impacts. Recklessness like this could be the difference between life and death. It can lead to more toxic emissions than projected, a fire, or an explosion. A mistake this big makes us wonder how many of their “facts” can be trusted. If they cannot get the details right now, how can we trust them to safeguard our health and safety in the future? **MY GREATEST DESIRE IS THAT MY HOME DOES NOT BECOME A TOXIC WASTE ENVIRONMENT DUE TO GRACE’S MISSED DECIMAL POINTS.**

6. WR Grace has a history of causing harm to communities

WR Grace has not been a good neighbor now or ever. Since they became a chemical company in the early 1950s, they have left a string of disasters across many cities including Columbia. Their consent order to clean up groundwater here continues and local communities such as [Curtis Bay](#) continue to experience issues related to having WR Grace as a neighbor. See the following links for more information on WR Grace’s decades long negative impact on local communities: [Wayne, NJ](#), [Woburn, MA](#), [Acton, MA](#), [Libby, MO](#), [Tampa, FL](#). In total, they have had 32 superfund sites to remediate and many toxic spills since including one as recently as 2023.

7. Recent changes to federal funding will impact MDE’s ability to monitor air pollution including WR Grace’s pilot plant

Finally, I will leave you with this. Last week, it was announced that nearly \$14 million in [federal funds intended for Maryland Department of the Environment \(MDE\) were frozen](#), impacting their ability to monitor air pollution (see screenshot below from WYPR news article).

About \$13.7 million in direct grants to the Maryland Department of the Environment were “suspended” Tuesday, agency spokesman Jay Apperson said. They include funding for air pollution monitoring, mining-related projects, the expansion of electric vehicle chargers, coastal and forest restoration projects, and workforce training for energy-sector jobs.

We do not know if this funding will be reinstated. Without independent monitoring, there is no clear understanding of how Maryland or Howard County would be able to hold WR Grace to their projected emissions.

It is for all of these stated reasons, that I believe no company—present or future—should be allowed to operate a pyrolysis incinerator or similar technology involving “commercial plastic pellets or feedstock which produces flue gas and requires a permit from the state of Maryland” near residential homes. There should be no loopholes, no exceptions, and no grandfathering in for any company in Howard County.

I implore you, as the officials whom we elected to keep our communities safe, to do the right thing and approve CB11-2025. This measure will ensure that Howard County families stay safe from air pollution, fires, explosions hazards and pilot plants that lack community support and offer little to the adjacent communities.

Sincerely,

Shamieka Preston and family