

County Council Hearing on:
Comprehensive Ten-Year Solid Waste Management Plan 2020-2029

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Testimony of
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The Ten-year Solid Waste Management plan has some excellent and strong recommendations for reducing our waste. It aims to dramatically expand composting, recycling of construction and demolition material and implementing a Pay-As-You-Throw strategy throughout the county.

What it does not address is the way we dispose of the trash we cannot recycle. To address this question a citizens' coalition - Zero Waste Montgomery - looked at county financial statements, Northeast Maryland Waste Disposal Authority financial statements, Covanta, county and EPA emissions data, the HDR 'Aiming for Zero Waste' report and the Zero Waste Task Force report, and consulted numerous experts and public and private solid waste management providers.

The ten-year plan assumes we will keep operating the waste incinerator for the foreseeable future. Based on our findings, my testimony will lay out a waste management solution that is cost-effective, far less polluting in greenhouse gases and toxic emissions that affect county residents' health. This solution will also allow us to immediately stop contaminating a majority-black community in Virginia with contaminated incinerator ash.

Let's start with a brief historical perspective. Incinerators had their heyday half a century ago. Many were constructed and, with the guidance of the industry, the EPA developed a model to test for safety that skewed all data to show that burning trash is safe for the environment and people. We have learned a lot since then.

In the past 20 years, 44 municipal waste incinerators have been shut down. Not one new one has been built except to rebuild one on an existing site in Palm Beach. All new project proposals have been defeated by communities including one recently in Frederick County. Our incinerator is 26 years old. This is three years past the average lifespan of an incinerator in the United States.

When you look at EPA data on the incinerator in Dickerson it shows that we are actually producing 50 times more greenhouse gases than our Department of Environmental Protection reports in this Ten-Year Plan. The DEP report says we are releasing 12,000 tons of greenhouse gases annually. By contrast, the county Climate Action Plan says we are releasing over 200,000 tons a greenhouse gases and even that number is adjusted down to exclude all the gases that come from burning organic material. The EPA e-grid report shows that we are actually releasing over 600,000 tons of greenhouse gases annually. This is an absolutely startling difference. Why is this data so wildly different: 12,000 tons reported by the DEP and 600,000 tons reported by the EPA?

Apart from the pollution and health concerns, we have found that although the volume of our trash has not increased, disposal costs continue to go up and, in reviewing county expense reports, actual expenses exceed budget expenses. The incinerator will cost us more and more as it ages.

Perhaps most importantly, we are not meeting current modern standards. Historically emissions standards have not been set based on safety but rather on what was technologically feasible and size of the facility. Larger facilities were allowed to pollute more than smaller ones. It is entirely irresponsible for us to keep running our incinerator without at least upgrading to safer limits that are now achievable. All new projects have required half the nitrogen oxide emissions that we emit. The Palm Beach facility emits five times less mercury, cadmium and hydrochloric acid, four times less dioxins and furans and 12

times less lead. The technology is there. But the cost to operate within modern limits makes this by far and away the costliest solid waste disposal method. To bring us up to modern standards, with scrubbers for NOx, more reagents for toxins, and continuous monitoring, it would require a \$95 million investment.

Given this information, what are our options?

1. If we keep the incinerator burning until 2026, the DEP estimates it will cost us an additional \$12-27 million in capital costs plus the 95 million to bring our incinerator up to modern standards. This still gives us no solution at the end of five years and wastes \$120 million.

2. If we continue to incinerate until 2040, we spend another \$37 to \$73 million in capital costs plus the \$95 million to raise emission standards. And every year we continue to dump almost 200,000 tons of toxic ash on a majority-black community in Virginia. Again, no solution at the end of 20 years when the incinerator closes.

3. We could develop the Site 2 landfill in Dickerson. The problem here, again, is that we spend over \$100 million to develop a 20-year solution. We also would be building a landfill over the sole-source aquifer that provides the only drinking water for all of the residents living in that area. If that aquifer becomes contaminated, the area will become uninhabitable. Also, the intake pipe for the WSSC water supply to the whole metropolitan region is below the streams that would border the landfill and run into the Potomac. So again, a very risky solution with still no waste management strategy after 20 years.

4. The final, and in our opinion, the very best option, is to cut our losses, close the incinerator within the next year and haul our trash to a well-managed landfill out of state. Since we finished paying off our debt in 2016, there is no penalty to break our contract with Covanta.

This solution will half the greenhouse gases we are emitting and eliminate virtually all of the toxic emissions. We could immediately stop dumping 200,000 tons of contaminated ash on another community. As we increase the diversion of organics from our waste stream, we will have even fewer greenhouse gas emissions in the future. Simultaneously implementing other zero waste strategies such as Pay-As-You-Throw will reduce waste by at least 40% giving us an immediate cost reduction in disposal fees.

This could be done via rail or via truck. Rail sounds like the better solution but in fact it probably is not. We could use available tracks, but we would need a new railcar fleet and would need to reconfigure the transfer station to load trains and to store rail cars. This would be an investment of tens of millions of dollars if we were to buy the new cars, (possibly much less if we had a hauling agreement with a company that owned the cars).

The most nimble solution is actually to truck in our trash to a remote landfill. Our research shows that this gives us options of more than 20 well-managed, long-term landfills that have good methane capture and long-term receiving capacity. There is a very marginal difference in greenhouse gas emissions between trucking and rail-hauling, even out of state, when compared to incinerating and landfilling. It is actually a less than 3%.

There would be minimal investment costs, just some reorganization at Shady Grove. Contractors we have asked estimate costs to be roughly equal to incinerator fees. If we include the capital costs to keep the incinerator safely operating and bring it up to modern emissions requirements, incineration would be far more costly than landfilling. As trash volume reduces so, of course, would our disposal costs - not so with incineration.

Another benefit with closure of the incinerator is that Sugarloaf Citizens' Association would likely allow for the expansion of the Dickerson Yard Trim Composting facility to include the processing of residential

food scraps under closed-cover such as is being done in Prince Georges County. We would get a perfect location for large-scale residential food composting. This would further reduce the volume of our trash by about 20% and further reduce GHG emissions from the landfill.

This solution is a win for county residents and a political win for the County Council. We get an immediate concrete reduction in greenhouse gases, a dramatic reduction in overall pollution, and we stop harming a majority black community in Virginia and we get a major composting solution.

This is truly a forever, cost-effective sustainable solution for Montgomery County.

Please read our comprehensive report (available on the SCA website and in PDF form). We welcome discussion of the findings. Let's get this into the Ten Year Plan and make this the year that we chose a solution that best serves Montgomery County now and in the decades to come.