

Testimony regarding the 10-year Solid Waste Management Plan

Section 5.2.4 of the 10-year solid waste management plan states THE REQUIREMENT THAT THIS PLAN MUST PROMOTE PUBLIC HEALTH, SAFETY, AND WELFARE. This is in direct opposition to continuing to **incinerate our trash for another 7+ years**, when a safer solution is available almost immediately by transporting our trash to landfill and not waiting for other Zero waste activities to be implemented first. We are concerned that the DEP has relied on Reworld to provide them with emissions information. Reworld and the current County consultant, Arcadis, use the WARM model to evaluate waste management strategies. **This deceptive model** has been used for years to prop up and justify incineration of trash. Under the Biden administration this model came under scrutiny for three major flaws that cause it to conclude that incineration is better than landfiling. It was discovered to never have been peer reviewed, despite having 16 versions out. It is currently undergoing revision based on the first ever peer review in 2023. A major flaw found in this model is that it allows the erasure of about half of the greenhouse gas emissions from incinerators. This is bizarrely justified by reasoning that anything made of biogenic material will regrow and, therefore, does not need to be counted in the emissions. It is thus that when CO₂ and methane emissions are reported by Reworld **they don't report half of them!** When they compared their emissions to landfiling, however, they count **all** of the biogenic emissions from landfills which are primarily methane gas and they often do not account for the fact that most of our regional landfills capture 75% of these emissions.

In a meeting with stakeholders this past November, EPA officials made it clear that “if people are using the WARM model in site specific situations to say there should be a municipal waste incinerator in this area or there should not be, they're using WARM for a use for which it is not intended, and should never be used for. We made that clear on our website.” Subsequently, EPA issued a statement saying that the model is a high level screening tool that *should not be used to make local decisions* on incineration versus landfiling for a given community. This is in part due to flaws in the model. For example, incinerators sometimes come out looking better than landfills because it is assumed that their electricity displaces fossil fuels on the electric grid. However, since Maryland State law requires utilities to buy electricity from “renewable” sources, and Maryland considers incineration a renewable energy source the same as wind and solar power, **this incinerator does not displace fossil fuels, it displaces wind and solar energy.**

Finally, the WARM model only looks at greenhouse gases. When we incinerate we produce many many toxins that are harmful to human health that are not even considered in the WARM model. Very few of these toxins are released from a landfill.

There is a peer-reviewed lifecycle assessment tool that is being used in many municipalities around the country that gives equal weight to all emissions from both landfills and incinerators. This is called the MEBcalc model, designed by Sound Resources Management Group, a national consulting company. This company was hired to perform an assessment to compare Montgomery County's incinerator to regional landfills for the 2020 Beyond Incineration report requested by the County Executive. This report shows that our incinerator is twice more polluting than delivering our trash to a regional landfill *including* the emissions from diesel trucks or railhaul. Why is none of this information reported in the 10 year solid waste management plan?