

February 11, 2025

To: Council President Kate Stewart, Council Vice-President Jawando, and esteemed members of the Montgomery County Council

From: Linda R. Bergofsky

Please accept this document as my testimony on the County's Comprehensive Solid Waste Management Plan 2024-2035. I am co-chair of the Dickerson Area Facilities Implementation Group, or DAFIG, but I am writing as an individual citizen and resident of Poolesville. In Poolesville, we have strived to do the right things right by focusing on sustainability, expanded recycling capacity, engaging our community, and assuring water quality. But we are but an oasis surrounded by a massive pollution generator known as the Dickerson trash incinerator.

The Environmental Injustice Continues: In learning about how we dispose of our trash, I was alarmed to find out that not only do we burn all of our trash but we send the ash containing all the heavy metals and other pollutants that were removed from the incinerator to the Old Dominion landfill in Montrose Virginia right next to a majority black community. If we send about 150,000 tons of this ash to this landfill every year that comes out to over 4 million tons of toxic ash dumped on that community in the past 29 years. How can the DEP characterize this harmful and volatile practice as "beneficial recycling and reuse"? This is just offensive to me. It may be technically legal to dump this ash, but the County should be looking for a safer disposal option for that material.

Under the Biden administration, the EPA was working on changing the designation for this ash from non-hazardous to hazardous (as it was designated a couple of decades ago until industry lobbyists persuaded the EPA to allow a method of testing the ash that relied only on what liquids leach out under short term lab tests. EPA now states that non-hazardous combustor ash may still present potential risks via other pathways, such as through inhalation, ingestion, or dermal contact. Sadly, I know that the new administration is probably going to dismantle EPA, but does that mean that Montgomery County should also turn a blind eye to emerging testing methods that illustrate how toxic our ash is? Shouldn't we hold ourselves to a higher standard than what the Trump administration wants for our country? I, for one, surely do.

Stop Using Euphemisms: I am tired of hearing the Montgomery County trash incinerator called a resource recovery facility. This is misleading; it's a term coined by the industry to rebrand and greenwash the burning of trash. The incinerator is a purpose-built facility to burn our trash. It was not built to make electricity. This is just a by-product of the trash burning and, I will add, just about the dirtiest form of producing electricity – far worse than burning coal, for example. Montgomery County's incinerator releases 28 times more dioxin, 6 times more lead, five times

more mercury, three times more nitrogen oxides and 65% more carbon dioxide than coal to make the same amount of energy. It would be more appropriate to call it a resource destroying facility. Valuable resources are being burned that could be recovered and resold or reused. There is so much more value in a secondhand item than in the money you would get from burning it. A fabulous example of this money-making opportunity is urban or in Berkeley CA. For 20 years they have been collecting recyclable and reusable materials from the waste stream and selling them in their store. They have made hundreds of thousands of dollars on these secondhand items. Please stop buying into this industry greenwashing by calling the trash incinerator something that it is not.

Leave our Aquifer Alone: As you may know, Poolesville residents get our water from wells. In fact, all of Poolesville and every other resident of the Ag Reserve rely on pumped well-water from the Piedmont sole source aquifer. If any of you lived “up here,” you would know that anything that threatens our water source must be addressed.

In Section 5.3.7 of the plan, DEP discusses Site 2 in Dickerson as an alternate landfill site. The Plan should state explicitly that Site 2 was chosen prior to 1998. In 1998, the federal government designated the Piedmont sole source aquifer underneath the landfill as the only water source for the region. This should be mentioned in the 10-year plan as to whether it now exempts Site 2 from being considered as a landfill location. If built, it could endanger the drinking water of all the communities in the surrounding area. Better yet, take Site 2 out of the plan.

Bring back the Original Poolesville Beauty Spot: When I first moved here, the Beauty Spot on Jerusalem Church Road allowed Ag Reserve residents to drop off large items, and recyclables and certain hazardous materials such as motor oil. It was open during the week and on Saturdays. Today, it is open a few hours a week and does not take much at all. Consequently, people are increasingly using the Ag Reserve as a dump; go on the portion of River Road that is adjacent to the C & O National Historical Park and you will see hundreds of tires thrown into the woods, old appliances and more. Not only should the Plan include restoring the Beauty Spot as it was, DEP should be building more Beauty Spots all over the County. For us and for many other County residents, it takes over an hour to haul things to Shady Grove. Make it easier for residents to recycle and dump hazardous materials.

The Plan Reeks of the Status Quo: This plan is remarkable for its lack of vision and forethought. It reflects no original thinking and is insulting to the residents of the Ag Reserve who have had to deal with the consequences of the incinerator for too long. I refer you to [an article](#) in the Miami Herald that illustrates how communities are fighting back against incinerators. Such fights have taken down politicians who failed to protect the health and well being of all of their constituents. Finding ways to deal with solid waste that don't violate tenets of public health and environmental justice is the role of good government. Please make DEP accountable for its failure to adequately

plan for the future by denying its contract extension with ReWorld. Force DEP to face the music and find a better, faster, cheaper way to deal with our solid waste than continue to run an incinerator that will require \$100 million in maintenance costs. If, for whatever reasons, the proposed contract extension is approved to continue burning our trash for another seven years, we should, at a minimum, find a safer landfill for our toxic ash that will not harm the receiving community, improve our testing of harmful effects on the residents of the Ag Reserve, and take all necessary steps to reduce the amount of waste we produce.

Thank you for your time and attention.

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