



## Environment Committee

**Committee:** Economic Matters  
**Testimony on:** HB0875 - "Electricity-Renewable Energy Portfolio Standard -- Qualifying Biomass"  
**Organization:** Takoma Park Mobilization Environment Committee  
**Person**  
**Submitting:** Diana Younts, co-chair  
**Position:** Favorable, with Amendment  
**Hearing Date:** February 18, 2021

Dear Mr. Chairman and Committee Members,

Thank you for allowing our testimony today in support of HB0875, with an amendment. We strongly urge you to support the proposed bill to remove black liquor from qualifying biomass in the Renewable Portfolio Standards (RPS) and to add an amendment to also remove incineration.

**Neither Black Liquor or Incineration is Clean:** Black liquor is a tarry, carbon-rich and harmful byproduct of the pulp and paper industry. It emits climate-disrupting CO<sub>2</sub> and other pollutants, including sulfur dioxide, arsenic and lead which cause serious damage to our climate and our residents' health.

Trash incineration is even dirtier than black liquor and coal. To produce the same amount of energy as a coal plant, trash incinerators emit more greenhouse gases than coal plants do. Trash incinerators are the dirtiest way to make electricity by most air pollution measures. Even with air pollution control equipment in place, trash incinerators emit more pollution than (largely uncontrolled) coal power plants per unit of energy produced.

To produce the same amount of energy as coal power plants in Maryland, the Montgomery County incinerator -- operated by Covanta -- releases 15% more fine particulate matter, 60% more arsenic, 68% more greenhouse gasses, and 94% more nitrogen oxide (which triggers asthma), 3.5 times the amount of chromium, 11 times more lead, 21 times more cadmium, 26 times more mercury, and 50 times more hydrochloric acid than a coal plant. Incinerators release 3.1 times the amount of mercury as landfills.

**Dirty Energy Sources such as Black Liquor and Incineration are Displacing Clean Energy at an Increasing Rate in the RPS:** The RPS is among our state's most important programs for substantially reducing our emissions of climate-disrupting greenhouse gases. The RPS' increased importance under the 2019 Clean Energy Jobs Act (CEJA) means it should be focused on incentivizing new, renewable energy facilities which will support Maryland's efforts to mitigate climate change. Instead, a shockingly large and growing percentage of Maryland's renewable "clean energy" in the RPS comes from high-polluting energy sources. Maryland's percentage of energy from dirty sources (incineration, black liquor, biomass) in the tier 1 Renewable Portfolio Standards *grew from 33% in 2018 to 40% in 2019*. In 2019 alone, Maryland paid over \$32 million to buy renewable energy credits from dirty energy sources. See Report [here](#).

Removing black liquor and incineration from the RPS would lead to greater support for clean renewable energy. When dirty forms of energy are incentivized, they are treated like solar and wind energy and displace clean sources in the REC market.

Black liquor accounts for 25% of the energy in the RPS. Because Maryland's only paper mill closed in 2019, all of that energy is from out of state. Excluding black liquor and incineration would reduce the pool of RECs in the PJM grid, which could be filled by truly clean, renewable energy. While black liquor uses more RECs (renewable energy credits) than does incineration, each REC bought for incineration represents more pollution than each REC given to black liquor. One incineration REC represents 800% more CO<sub>2</sub> than one Black Liquor REC and also emits more toxic pollutants than does black liquor.

**Allowing Dirty Energy in the RPS Undermines Montgomery County's Climate Action Plan.** Montgomery County has committed to reducing its greenhouse gas emissions by 80% by 2027 and 100% by 2035. A critical element of achieving that ambitious goal is for it to get its energy from clean, renewable energy sources. Allowing black liquor and incineration in the Renewable Portfolio Standards undermines Montgomery County's Climate Action Plan (as well as Maryland's Greenhouse Gas Reduction Act) because dirty energy counts toward clean energy requirements. The subsidies currently going toward black liquor and trash incineration, if applied to actually clean renewable energy, would have an important impact on fighting climate change. Instead, we are allowing subsidized dirty energy to take us backwards.

In testimony on HB332, a bill introduced specifically to remove incineration from the RPS, Montgomery County testified in favor of removing incineration from the RPS,

despite the fact that the RECs for the Covanta incinerator generate income for Montgomery County.

As Speaker Adrienne Jones said recently, “climate change is an existential threat” and removing black liquor from the RPS is an “important first step” in addressing it. Removing incineration is just as important.

For these reasons, we urge you to support HB0875, with an amendment, and remove black liquor as qualifying biomass and incineration in the Renewable Portfolio Standards.