

February 16, 2021

Comments before House Economic Matters Committee

**FAVORABLE**

**House Bill 875**

Electricity - Renewable Energy Portfolio Standard - Qualifying Biomass

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Good afternoon. My name is Mike Ewall, and I'm the founder and director of a national organization, Energy Justice Network. Energy Justice works at the local level with grassroots community groups in Maryland and the rest of the country to support efforts to promote zero waste, and to stop polluting and unnecessary energy and waste industry facilities, with a focus on ending waste incineration.

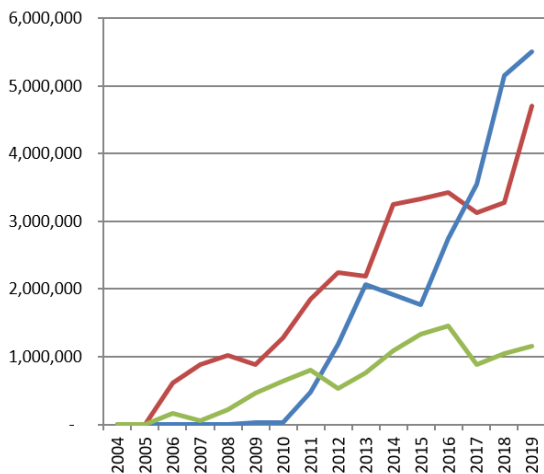
We emphatically support the long-overdue removal of subsidies to filthy paper mills for burning their toxic wastes known as black liquor. We'd encourage you not to amend the bill as the Senate did to allow mill residue other than black liquor to get credits. 9% of the credits going to the same paper mills that burn black liquor are from other "biomass" such as mill residue.

Maryland residents have been subsidizing a dozen paper mills to date, not just the Luke Mill. These are paper mills in Michigan, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, and Wisconsin. In 2018, 9 paper mills (4 in VA, 2 in NC, and 1 each in OH, PA, & TN) have received Maryland renewable energy credits (RECs) and 6 of those mills also received credits for burning "biomass" other than black liquor.

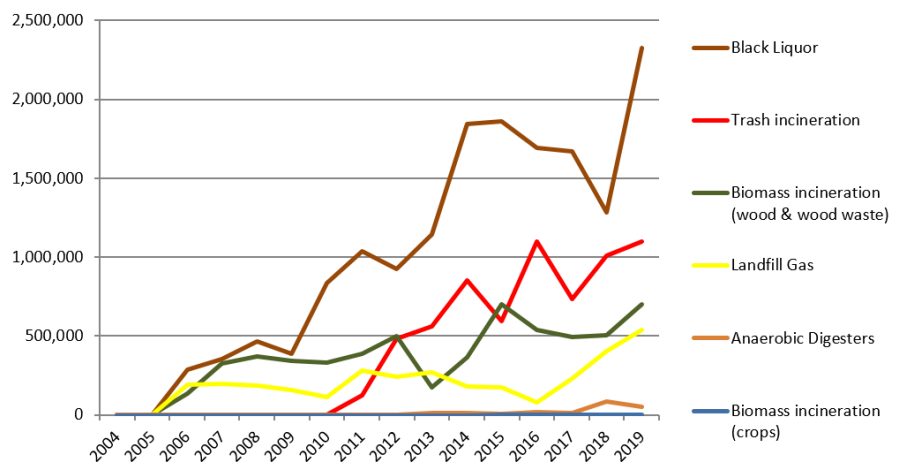
Biomass credits also flow to 3 tree burners in VA and KY, with 93% of those credits to a tree burning biomass incinerator in South Boston, VA. These subsidies ought to be cut out as well. Biomass is 50% worse than coal for the climate and is comparably polluting on several other measures. It doesn't benefit Maryland to throw money at tree burners in VA any more than it does to subsidize out-of-state paper mills.

Maryland stands out in supporting black liquor burning at paper mills to this degree. Of all of the states in the regional "PJM" grid Maryland is part of, Maryland represents 66% of the black liquor RECs used to meet state renewable energy mandates in the region, and 57% historically, including RECs granted by DC (which no longer allows it), IL, PA, OH, and DE.

MD RPS Renewable Energy Credits



MD RPS Renewable Energy Credits to Dirty Energy Sources



Black liquor credits are the largest source of dirty energy RECs granted by Maryland, by far, and it's increasing dramatically.

The Luke Mill was Maryland's #1 air polluter, responsible for a whopping 20% of the total pounds of industrial air pollution in 2017, according to the latest data reported by the mill to EPA's National Emissions Inventory (2017). Out of 517 industrial air polluters in Maryland, the Luke Mill was #1 in sulfur dioxide (SO<sub>2</sub>) emissions, accounting for 49% of the state industrial SO<sub>2</sub> emissions. Sulfur dioxides cause respiratory diseases, breathing difficulty, and premature death. They were also the #1 source in the state for cancer-causing arsenic pollution (21% of the total), #1 in cancer-causing polycyclic aromatic hydrocarbon pollution (91% of the total), and #1 in particulate matter emissions, which lead to heart attacks, strokes, respiratory problems, and much more. Air pollution-wise, the Luke Mill was also #2 in the state for hydrogen sulfide emissions (responsible for rotten egg odors), #2 in nitrogen oxide pollution that triggers asthma attacks, and #4 in emissions of toxic volatile organic compounds. In 2014, they were the state's #1 source of mercury in the air. And this air pollution is after expensive upgrades they once boasted about.

Black sludge smelling like rotten eggs has been found to be leaking from the mill into the Potomac River, and MDE believes it to be black liquor mixed with coal ash, according to the Baltimore Sun.

The biomass carbon neutrality argument has been scientifically debunked repeatedly. It is not "carbon neutral," but is one of the leading sources of greenhouse gases. See [www.energyjustice.net/biomass/climate](http://www.energyjustice.net/biomass/climate) for an overview of the science debunking the carbon neutrality myth.

In addition to subsidizing paper mills to such a high degree, Maryland is also an anomaly in allowing trash incineration in Tier 1 of its RPS. Language from Del. Ivey's House Bill 332 ought to be amended into this bill, removing trash incineration ("waste-to-energy" and "refuse-derived fuel") and, to be fair, landfill gas (in section (s)(4) ought to be removed as well, so that landfill and incinerators both stop being subsidized as renewable energy.

The best way to help clean energy sources (wind and solar) succeed is to get the dirty energy sources out of the RPS. They've historically been taking up the most space. This doesn't just mean stopping this subsidy for black liquor, but for incinerators and landfills, other forms of so-called "biomass" burning, and anaerobic digesters such as those on factory farms in Ohio or digesting sewage sludge in DC. Most of the dirty energy is supplied from out-of-state. In 2019, 29% of the trash incineration credits went out-of-state, as did 98% of the landfill gas credits, 96% of the biomass incineration credits, 100% of the black liquor credits (paper mills profiting from both black liquor and biomass which is counted separately), and 100% of the credits to anaerobic digesters.

For more information, see:

Trash incineration: [www.energyjustice.net/incineration](http://www.energyjustice.net/incineration)

Landfill gas: [www.energyjustice.net/lfg/](http://www.energyjustice.net/lfg/)