



**To: House Environment and Transportation Committee
Senate Education, Health, and Environmental Affairs**

Re: SB 693 and HB 987 Ambient Air Quality Control – Cumulative Air Impact Analysis

The Maryland Recycling Network promotes sustainable reduction, reuse and recycling (the 3 "R's") of materials otherwise destined for disposal and the purchase of products made with recycled material content. We achieve these goals through education programs, advocacy activities to affect public policy, technical assistance efforts, and the development of markets to purchase recycled materials and manufacture products with recycled content.

We share the desire to ensure clean air, however, we are concerned that SB 693 and HB 987 as currently drafted have unintended consequences for other equally important environmental initiatives. Specifically, we believe these bills could adversely affect yard waste composting/mulching operations that use tub grinders. Sizing for tub grinders is typically greater than 500 HP and this is the threshold for having to receive a permit to construct from MDE. The bills would require upfront air monitoring for at least 6 months for a grinder that would go into a protected area. The protected areas are fairly well defined in the bill, but the bill allows MDE to add to this list any area that they feel there is an appropriate stressor. We believe the bill could inadvertently make renewal of permits for tub grinders difficult or siting new ones even more difficult. This constraint has the potential to undermine the goal of the Composting and Anaerobic Digestion Facilities - Yard Waste and Food Residuals bill passed in 2014, the success of which to a large extent on expansion and/or siting of composting facilities.

The Maryland Recycling Network stands ready to serve as a sounding board and resource for legislators and others interested in pursuing our mission. Please do not hesitate to contact me or our Executive Director, Peter Houstle at phoustle@marylandrecyclingnetwork.org, 301-725-2508 or MRN, PO Box 1640, Columbia MD 21044 if you have any questions or would like additional information regarding the above.

We look forward to working with you to continue the strides we have all made to improve Maryland's recycling programs in a time-effective and cost-effective manner.

Sincerely,

A handwritten signature in black ink that reads "Peter M. Houstle". The signature is fluid and cursive, with the first name being the most prominent.

Peter Houstle
Executive Director