

From: [Patricia Kullberg](#)
To: [HEE Exhibits](#)
Subject: HB 4049
Date: Saturday, February 1, 2020 9:23:21 AM

To Whom it May Concern:

I am writing in firm opposition to HB 4049, which would grant renewable energy credits to the Covanta Marion waste incineration business.

1. It is outrageous that a huge and profitable national corporation would come to the public trough for subsidies to upgrade its aging, out-of-date facility. What is the return-on-investment for the public from this transfer of public dollars into private hands? These dollars were meant to be spent on the development of wind and solar energy, to coax the energy market away from its reliance on fossil fuel. Traditional renewable energy sources, unlike Covanta, emit NO greenhouse gases (GHG). According to the Intergovernmental Panel on Climate Change (IPCC) [30 to 50% of waste incineration involves the burning of fossil fuel products](#). No one considers the burning of fossil fuel products a renewable source of energy. More to the point, for Covanta, according to the DEQ proposed Air Quality Permit issued in October 2019, half its GHG emissions come from fossil fuel derived products.

2. Covanta Marion would have you believe that their facility in Brooks is good for global warming. Don't believe it for a second. An [independent study](#) commissioned by Portland area Metro in 2016 compared GHG emissions of the Covanta facility to the Arlington landfill and found that it was a toss-up between the two. A lifecycle assessment of GHG emissions from the facility versus the Salem landfill alternative, Coffin Butte, has not been conducted. Furthermore, the methodology used in the Metro report did not even count biogenic greenhouse gas emissions (from burning organic matter) from the Covanta incinerator, which are fully half of its emissions. This accounting methodology has been [scientifically challenged](#) and in 2013 a Washington DC court of appeals ruled that [biogenic GHGs emitted by incinerators](#) must be counted when assessing their contribution to global warming.

3. The appropriate alternative to trash incineration is not, however, a landfill, which has its own problems with GHG emissions, chiefly methane. Subsidy of trash incineration threatens to crowd out development of zero waste options, such as re-use, recycling and composting, whose GHG contributions are negligible. The Global Alliance for Incinerator Alternatives found that [municipal waste can be reduced by up to 90%](#) through these strategies. According to an [EPA case study](#), San Francisco has managed to divert 80% of its waste to recycling or re-use. Why can't we?

I strongly urge you to step away from subsidy of a waste management technology that has no place in the necessary transition away from fossil fuel dependence to truly sustainable energy sources.

Respectfully submitted,

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