Submitter: Theodora Tsongas

On Behalf Of:

Committee: Senate Committee On Energy and Environment

Measure: SB488

To: Senate Committee on Energy and Environment
Re: SB488 Medical Waste Incineration Act
Date: March 7, 2023

Greetings Chair Sollman, Vice-Chair Findley, and Members of the Committee:

I am Dr. Theodora Tsongas, an environmental health scientist specializing in environmental epidemiology with a 40 year career in public health. I am a member of Oregon Physicians for Social Responsibility and the Environmental Justice Committee of the American Public Health Association.

I am submitting this testimony in support of Senate Bill 488 in order to make sure that emissions from medical waste incineration are controlled in the State in accordance with Federal Standards and best available control technology. It is important that medical waste is handled by incinerators differently than municipal waste due to the difference in character of that medical waste and the need for more stringent treatment requirements to protect the health of the public.

The American Public Health Association has just published its 2023 policy alerting us to the need for control of medical and health care waste due to the lack of consistent regulations from state to state and the lack of a tracking system to determine how and where medical waste is generated and disposed, and the prevalent location of landfills and incinerators in low income and communities of color.(1) As of 2019, 79% of municipal solid waste incinerators in the US were located in low-income communities or communities of color.(2)

This is an environmental justice issue as well as an issue of inadequate regulation of industrial emissions. The farming community of Gervais is located near the Covanta waste incinerator, as are other farms and communities working and living in the mid-Willamette Valley. The Covanta incinerator has been receiving and incinerating medical waste from a number of sources outside of Oregon. As a result, emissions of hazardous and toxic air pollutants, including extremely toxic and persistent dioxins and furans, have increased due to inadequate treatment of that waste to comply with municipal solid waste regulations, but not medical waste regulations. The Covid pandemic has resulted in large increases in plastics in medical waste, and it is likely that this will not be the last pandemic we experience. Because medical waste contains larger amounts of plastics, especially polystyrene plastics, greater amounts of dioxins/furans and other air pollutants are emitted by the Covanta waste

incinerator. Dioxins and furans are produced when plastics are burned; they do not exist in nature but are produced by industrial processes, and do not degrade in the environment. So statements that the current system produces a cleaner waste stream are incorrect, as these pollutants are released into the air and contaminate air, water, and soil nearby and it is not certain how far these contaminants are carried in air, surface water, soil, and in plants and in food produced on these lands. The people working and living nearest the incinerator are at greatest risk of exposure to these pollutants and at greatest risk of suffering the ill effects resulting from that exposure.

SB 488 will help reduce emissions of toxic air pollutants and their adverse health impacts for surrounding communities. Please support SB 488.

Thank you for your hard work.

1 APHA, 2023. Advancing Environmental Health and Justice: A Call for Assessment and Oversight of Health Care Waste. Policy Number 20224 November 8, 2022.
2 Tishman Environment and Design Center, May 2019. U.S. Municipal Solid Waste Incinerators: An Industry in Decline, The New School. 87 pgs.