

BOARD OF HEALTH

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John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
DOER.RPS@mass.gov

Dear Mr. Wassam:

As you know, recycling and waste disposal capacity in the Commonwealth is under significant pressure. While Massachusetts has one of the highest recycling rates in the country, China's decision to severely limit the material that they are accepting is having a significant impact on our community and across the country. Communities across the Commonwealth are being told that their prices are going up dramatically, in some case we have heard of increases of over a 100% or having to dispose of recyclables as solid waste.

In addition, Massachusetts has lost 1,377,000 tons a year of capacity from six landfills closing in the last three years. Looking ahead, more landfills closures are expected and by 2024 there will be almost no landfill capacity for municipal solid waste left in Massachusetts.

Waste-to-energy (WTE) facilities in Massachusetts are the backbone of in state disposal capacity and are used by 124 towns across Massachusetts. With the landfill capacity diminishing, WTE facilities are becoming even more crucial. Unlike landfills, WTE facilities do not fill up and close, however WTE facilities are also facing several challenges. The collapse of the wholesale price of electricity in recent years, has negatively affected WTE facilities in Massachusetts. The loss of an existing WTE facility will have several negative effects, including dramatically increasing waste disposal costs to local governments and businesses, increasing emissions from the waste sector, a reduction of in-state renewable energy generation, and impacts on our roads as trash truck drive our garbage further and further.

To help address these challenges, **we support DOER amending the current Waste-to-Energy tier in the Renewable Portfolio Standard to increase the percentage requirement and to increase the Alternative Compliance Payment (ACP).** We believe the DOER should remove the sunset provision and instead occasionally review the program to ensure it is meeting the Commonwealth's needs.

These amendments will dramatically increase MassDEP's resources available for recycling. It will also make existing in-state WTE infrastructure financial sustainable, allowing for significant capital investments in these facilities, and avoid the loss of in-state disposal options and price spikes for municipalities and businesses. These changes will have minimal impact on rate payers.

The Commonwealth needs to support these facilities and support recycling efforts. These changes accomplish both goals.

Sincerely,

Leonard Izzo, Chairman
Milford Board of Health