American Lung Association.
Maryland

Members of the Judiciary and Legislative Investigations Committee:

Thank you for the opportunity to provide comments on City Council Bill **20-0615, The Ban the Burn at Every Turn Act**. The American Lung Association **strongly supports** this bill and requests the Council take swift action to ensure clean air and protect public health in Baltimore.

The American Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease through education, advocacy and research. The work of the American Lung Association is focused on four strategic imperatives: to defeat lung cancer; to champion clean air for all; to improve the quality of life for those with lung disease and their families; and to create a tobacco-free future.

More than 443,000 adults and 101,000 children in Maryland have asthma. Maryland is home to millions of additional people who are at risk from air pollution, including the young, the elderly and persons of color. The Lung Association in Maryland supports strong work such as legislation like The Ban the Burn at Every Turn Act which will help the hundreds of thousands of people with lung disease in Maryland to breathe easier.

By prohibiting any additional contracts with companies to burn Baltimore's trash, the Act would not only prevent critical emissions that are harmful in and of themselves, but also many that are precursors for the major dangerous pollutants of ozone and particulate matter.

The American Lung Association strongly supports safe, healthful air for all. All people are entitled to breathe healthy air and to be free of the adverse health effects of indoor and outdoor air pollution. Environmental policies must protect the public against acute and chronic adverse health effects.

The American Lung Association is especially concerned about the effects of air pollution on the health of vulnerable populations, including people with lung diseases such as asthma, lung cancer, and chronic obstructive pulmonary disease (COPD); children and the elderly and people living near major sources of pollution.

The American Lung Association does not support incineration of municipal solid waste or other waste, even if used for electricity production, but rather supports programs and policies to reduce the health and environmental impacts associated with refuse disposal by:

- first, reducing the use of materials in production, packaging and purchasing;
- second, reusing materials whenever possible; and
- third, recycling or composting as much of the remainder as possible.

The American Lung Association urges the use of safe non-combustion alternatives to dispose of all remaining waste. As we have commented previously in this regard, ***if*** waste materials are combusted, state-of-the-art pollution controls (i.e., Maximum Achievable Control Technology) must be required.

However, especially in the case of whether significant sources of air pollution such as refuse processing and combustion in the City of Baltimore should be permitted, the American Lung Association must cite further principles:

The development of strategies to protect public health must include early inclusion and meaningful involvement of those living in communities impacted by pollution and must foster equity by ensuring that no community bears a disproportionate burden of health impacts from air pollution.

The American Lung Association supports the protection of all people from the harm of air pollution, especially those who suffer disproportionate exposure from local sources of emissions. The American Lung Association recognizes that major sources of air pollution are often located near where many people, especially communities of color or lower income, live and work, which means their exposure to pollutants emitted can be more immediate and disproportionately harmful. The American Lung Association recognizes that, for many reasons, people in those communities also face a greater burden of lung disease, making them even more vulnerable to these pollutants.

The American Lung Association supports the aggressive targeting for cleanup of sources of dangerous air pollutants that impact nearby communities. The American Lung Association will work to reduce the disproportionate health burdens borne by economically disadvantaged and politically disenfranchised communities.

Furthermore, the American Lung Association recognizes that the current Wheelabrator Baltimore facility (Baltimore Refuse Energy Systems Co.) at 1801 Annapolis Rd, Baltimore, MD, the single largest industrial emitter in the city, is located in close proximity to residents who are disproportionally low-income and Black, and who have been shown to be some of the most vulnerable to adverse health effects of air pollution.

Simply put, there is no good reason why the approximately 45,000 people living within only a mile (about 150,000 within 3 miles) of the existing BRESCO site should continue to be unfairly subjected to decades more of having this facility spewing pollution into their air. In addition to South Baltimore, neighborhoods in the vicinity of this facility include Riverside, Riverside Park, Sharp Leadenhall, Pigtown, Morrell Park, and Westport—and elementary schools in those areas include Thomas Johnson, Sharp Leadenhall, Westport, and Morrell Park.

Pollutants emitted from combustion processes such as incineration pose serious threats to Marylanders' health. Nitrogen oxides (NO_x) cause a range of harmful effects on the lungs, including increased inflammation of the airways; worsened cough and wheezing; reduced lung function; increased asthma attacks; and greater likelihood of emergency department and hospital admissions.[1] Growing research warns that nitrogen dioxide (NO_2) is likely to be a cause of asthma in children. Looking beyond the lungs, newer research has linked NO_2 to cardiovascular harm, lower birth weight in newborns and increased risk of premature death.[2]

Nitrogen oxides also form particulate matter in the atmosphere. Particulate matter causes cardiovascular harm, lung cancer and premature deaths, among many other harmful health effects.[3]

Volatile organic compounds (VOCs) are key ingredients in the formation of harmful ozone, but they are independently harmful as well. Breathing VOCs can irritate the eyes, nose and throat, can cause difficulty breathing and nausea, and can damage the central nervous system as well as other organs. Some VOCs can cause cancer, such as benzene. Not all VOCs have all these health effects, though many have several.[4]

Ozone results from the reaction of nitrogen oxides and VOCs in the atmosphere. Ozone causes immediate breathing problems including shortness of breath, wheezing, coughing and asthma attacks. Newer evidence has linked ozone to harm to cardiovascular harm and premature death.[5]

The Lung Association thanks the Baltimore City Council for their commitment to the health and wellbeing of the residents of Baltimore. The people of Baltimore will benefit from having less emissions in the air to breathe.

Consistent with the scientific and medical evidence, with the facts on the ground and with our public policy positions, the **American Lung Association strongly supports 20-0615** and encourages swift action to move the bill out of committee and passage by the Council.

Sincerely,

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[1] U.S. Environmental Protection Agency. *Integrated Science Assessment for Oxides of Nitrogen -- Health Criteria*. EPA/600/R-15/068. January 2016.
[2] U.S. EPA, 2016.
[3] U.S. EPA, *Integrated Science Assessment for Particulate Matter*, EPA 600/R-08/139F. December 2009.
[4] Information on specific VOCs can be found at the Agency for Toxic Substances & Disease Registry.
[5] U.S. EPA, *Integrated Science Assessment for Ozone and Related Photochemical Oxidants*. EPA/600/R-10/076F. February 2013.