



**“To promote a zero-waste society that advocates for reducing waste, sustainably reusing resources and less landfill use.”**

April 7, 2022

RE: HF 4492 (HANSEN) DE-4, A-8 Amendment

Dear Chair Hansen and Environment and Natural Resources Committee Members:

On behalf of the Minnesota Resource Recovery Association (“MRRA”), I write in my capacity as a board member to thank you in advance for receiving this letter. MRRA is in favor of working together to promote zero-waste, advance product stewardship programs, and advance environmental justice (“EJ”) for all citizens. However, **MRRA strongly opposes the Rulemaking for Air Toxics language provision in the proposed A-8 amendment to the DE-4 to HF 4492**, as currently written.

**MRRA Strongly Opposes:**

- Sec. 60. [116.062] AIR TOXICS EMISSIONS REPORTING
  - MRRA facilities already have strict data practices and reporting requirements authorized by the EPA and the MPCA; additional rulemaking is not necessary

MRRA has 9 facilities across the state. Our facilities operate primarily in rural MN counties (Blue Earth, Otter Tail, Polk, Pope, Douglas, Goodhue) as well as metro country areas such as Olmsted, Washington, and Hennepin. Many of our facilities are built in the heart of some of the most successful destination locations in Minnesota. Our state-of-the-art air emission controls ensure a safe and clean place for people to visit, vacation, work and live. **Often, people that are unfamiliar with facilities like ours, mistake steam for pollutants. This is frequently the case during winter months.** Perham, Alexandria, Fosston, Red Wing, Rochester, and Mankato are envied by neighboring communities for the jobs and financial benefits created by our facilities. The local business reduces transport costs and harmful emissions and greenhouse gases caused by trucking waste to remote landfills, not in our backyards. We think globally and act locally.

We believe in moving Minnesota towards zero landfilling and leaving a legacy of a better Minnesota for future generations. For this reason, we respectfully request involvement in developing environmental justice bills to ensure that they are compatible with our shared environmental goals. In the short-term, our facilities are more expensive to operate than the nearest landfills; however, long term they are less costly due to lower environmental risks. Currently, Minnesota’s taxpayers have nearly \$1 billion in landfill clean-up costs. In accordance with MPCA guidelines our member counties choose resource recovery over landfilling as it ranks higher on the waste management hierarchy and creates less risk to the public’s health and pollution risk to the environment.

MRRRA members fully embrace the scientifically proven waste management hierarchy. We are currently advancing multiple regional programs of higher priority than resource recovery, which include waste reduction, waste re-use, recycling, and composting; these initiatives work towards zero landfilling. If resource recovery is weakened in integrated programs, Minnesota will move backwards, not forwards in waste management. These waste management strategies are recommended by the United States Environmental Protection Agency and required by Minnesota state law. Global leaders in environmental solid waste management which include countries such as Norway, Denmark, Sweden, Switzerland, Belgium, Germany and the Netherlands have the same perspective.

Minnesotans continue to generate more waste. The waste is more toxic and less recyclable. Let us carefully build environmental justice into environmental permitting without hurting the solid waste programs that were built to protect our constituents. I hope I have represented the need for Waste-to-Energy in Minnesota. If I did, you now know we are leaders of Minnesota's efforts to protect our environment. We thank you for your work to help Minnesota protect our climate by protecting Minnesota's investments in Waste-to-Energy. Thank you, we look forward to working with you.

Chris McConn (cell: 218.770.2810)

A handwritten signature in black ink, appearing to be the name 'Chris McConn', written in a cursive style.

MRRRA Board Member / Prairie Lakes Municipal Solid Waste Authority