



**MINNESOTA
RESOURCE
RECOVERY
ASSOCIATION**

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

February 1, 2023

House Environment and Natural Resources Finance and Policy

RE: HF 672 (LEE), HF 645 (LEE) and HF 673 (LEE)

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 the Board Chair 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 NONEXPIRING STATE INDIVIDUAL PERMITS; PUBLIC INFORMATIONAL MEETINGS language provision in the proposed language in HF 672 (Lee) and MRRA is potentially neutral on HF 645 (Lee) and HF 673 (Lee), as currently written.**

MRRA Strongly Opposes:

- HF 672 (Lee), Public meeting request every five years for nonexpiring air emission permits, denial of request for permit review required to be in writing and to state reason for denial, and creation of full-time equivalent position required.

Section 1, Subd. 4m; Nonexpiring state individual permits; public information meeting

- MRRA facilities already have strict data practices and reporting requirements authorized by the EPA and the MPCA; additional rulemaking is not necessary
- Adds significant time and cost to the permit application and issuance process
- Adds permit conditions (e.g., restrictions on operation, requirements for air pollution controls) that cap emissions at existing levels (as currently permitted for existing facilities, emissions for new permittees)

MRRA Potentially Neutral:

- HF 645 (Lee), Disposition of money recovered from litigation or settlement of environmental permit violations provided.
- HF 673 (Lee), Section. 1; AIR TOXICS EMISSIONS REPORTING and Sec. 2; [116.062] RULEMAKING; AIR TOXICS EMISSIONS and then follow up to modify permits to include air toxics.

The MRRA represents eight resource recovery facilities that process approximately one million tons of waste per year in lieu of landfilling. These facilities process waste from 31 of Minnesota’s 87 counties. We believe in moving Minnesota towards zero landfilling and leaving a legacy of a better Minnesota for future generations. However, Minnesotans continue to generate more waste which over time has become more diverse and less recyclable. Though in the short-term, waste-to-energy facilities may be more expensive to operate compared to landfills, the long-term environmental risks and liabilities for managing these wastes are much less costly. Currently, Minnesota’s taxpayers have nearly \$1 billion in landfill clean-up costs. To date, nearly \$400 million has already been expended and another \$400



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million is anticipated over the next 30 years. 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.

MRRA members fully embrace the scientifically proven Minnesota waste management hierarchy. We are currently advancing multiple regional programs of higher priority than resource recovery, which include waste reduction, waste reuse, recycling, and composting; these initiatives work towards zero landfilling. If resource recovery is weakened in integrated programs, Minnesota will move backward, 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.

We thank you for your work to help Minnesota protect our climate by protecting Minnesota's investments in waste-to-energy. On behalf of MRRA, I ask that you consider the environmental and climate benefits of resource recovery. I respectfully request HF 672 (Lee) be revised to prevent further cost burdens on already compliant waste-to-energy facilities. We want to be part of the EJ conversation and consideration. The MRRA is happy to provide additional information, resources, or discussion on this important topic. You can reach me at 218-770-2810 or cmconn@co.ottertail.mn.us.

Sincerely,

Chris McConn, P.E.

MRRA Chair

<http://mnresourcerecovery.com/>