



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

March 7, 2023

RE: S.F. 466 (Champion)

Dear Chair Hawj and Environment, Climate, and Legacy Committee Members:

On behalf of the Minnesota Resource Recovery Association (“MRRRA”), I write in my capacity as a board member to thank you in advance for receiving this letter. MRRRA is in favor of environmental justice and is committed to working together to improve S.F. 466, but MRRRA has concerns about S.F. 466 as currently written:

- S.F. 466 presents significant permitting challenges on a majority of potential submissions.
- S.F. 466 adds significant time and cost to the permit application and issuance process by the potential of adding 1-2 years to the permitting process. Additionally, S.F. 466 increases costs by an estimated \$100,000-\$200,000 per permit action.
- S.F. 466 adds permit conditions (e.g., restrictions on operations and requirements for air pollution controls) that cap emissions at currently permitted levels for existing facilities, and at 0 emissions for new permittees.
- S.F. 466 advocates that every proposed project permit application needs to have some type of emissions off-set to avoid a cumulative analysis, but with the over-generalized language of the triggers, it’s hard to know what that would entail.

The MRRRA 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.

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. 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.
- MRRA 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.

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 S.F. 466 (Champion) be revised to prevent further cost burdens on already compliant waste-to-energy facilities. We want to be part of the Environmental Justice 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.ottetail.mn.us.



Chris McConn
MRRA, Board Chair