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DEPARTMENT OF HEALTH
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WRITTEN
TESTIMONY ONLY

**Testimony in SUPPORT of HB0256, HD2, SD1
RELATING TO ENVIRONMENTAL PROTECTION**

SENATOR JARRETT KEOHOKALO, CHAIR
SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

April 1, 2025; 10:07 AM; Room Number: 229

1 **Fiscal Implications:** Undetermined.

2 **Department Position:** The Department of Health (Department) supports this measure.

3 **Department Testimony:** The Environmental Management Division, Clean Air Branch
4 (EMD-CAB) provides the following testimony on behalf of the Department.

5 The Department supports this measure that proposes to prevent backsliding on existing air
6 emission limits in the event that the United States Environmental Protection Agency (EPA)
7 enacts less stringent emission limits for waste-to-energy facilities. On March 12, 2025, the EPA
8 announced a major deregulation initiative with plans to reconsider 31 rules and policies that
9 largely address climate change or aim to reduce pollution from burning of fossil fuels. While the
10 EPA's announcement did not specifically target the regulations identified in this measure, the
11 Department understands rising concerns on deregulation and recognizes the benefit of
12 preventing the relaxation of emission standards to maintain and protect air quality.

13 **Offered Amendments** None.

14 Thank you for the opportunity to testify on this measure.

LATE

April 1, 2025

Honorable Jarrett Keohokalole, Chair
Honorable Carol Fukunaga, Vice Chair
Senate Committee on Commerce and Consumer Protection

Re: Testimony in **SUPPORT** of House Bill 256 H.D.2, S.D.1

Aloha Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee:

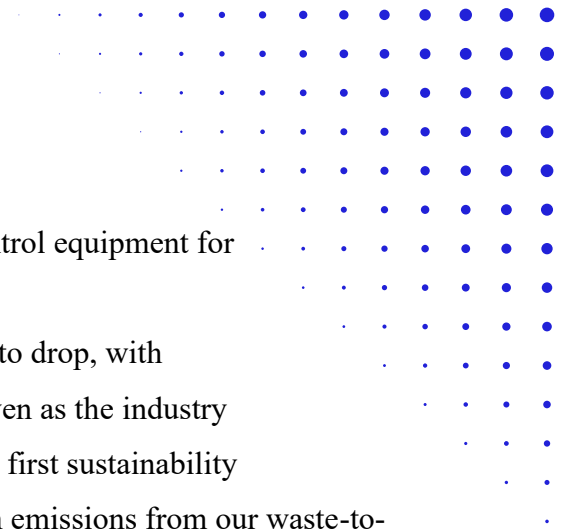
Reworld **supports** HB 256 H.D.2, S.D.1, which requires an owner or operator of a waste-to-energy facility to comply with certain United States Environmental Protection Agency regulations for emission limitations as they existed on 12/31/2024, unless emission limitations are made more stringent by federal regulations or by the state air pollution control permit issued to that owner or operator by the Department of Health. This bill would require waste-to-energy facilities to comply with existing U.S. Environmental Protection Agency (EPA) emissions standards as of December 24, 2024, even if those standards are made less strict in the future. Reworld, as operator of the City & County of Honolulu's waste-to-energy facility (HPOWER), has consistently operated well below the stringent EPA emissions standards and is committed to doing so in the future.

A. HPOWER Diverts Solid Waste from Landfills while Producing 10% of Oahu's Energy Needs

Reworld is the long-time operator of the HPOWER facility, which is tasked with diverting solid waste from the city's landfill while converting waste into energy. The facility processes 620,000 tons of municipal solid waste and recovers 19,000 tons of metals for recycling yearly. HPOWER creates enough renewable electricity to power 60,000 homes or approximately 10% of Oahu's energy needs.

B. The Clean Air Act and Maximum Available Control Technology (MACT) Successfully Reduced Emissions from Waste-To-Energy Facilities

The installation of air pollution control equipment at HPOWER and waste-to-energy facilities around the U.S. was driven by the Clean Air Act Amendments of 1990 and the included Maximum Achievable Control Technology (MACT) standards. Following the implementation of these requirements, emissions from the industry dropped dramatically due to the closure of



outdated facilities and the installation of updated air pollution control equipment for those remaining in operation.

Emissions from waste-to-energy facilities have continued to drop, with average 2020 concentrations 43-99.9% lower than 1990 levels, even as the industry processed more waste than ever before. Reworld is proud that our first sustainability program, established in 2007, resulted in up to a 74% reduction in emissions from our waste-to-energy facilities.

C. HPOWER Operates Well Below the Emission Standards and Supports HB 256 H.D.2 to Protect Those Standards from Any Potential Weakening in the Future

HPOWER has an excellent compliance record with the EPA's air emission limits for Municipal Waste Combustors (MWCs). The facility continuously operates below the emission limits set by the EPA, as depicted in the attached graphs showing the facility's performance over the years.¹

Under HB 256 H.D.2, waste-to-energy facilities will be required to comply with EPA emissions regulations existing as of December 24, 2024, even if those regulations are changed and made less strict in the future. Reworld strongly supports this bill to protect Hawaii and its residents from any potential weakening of federal standards applicable to HPOWER and other waste-to-energy facilities.

We note that the prior committee added an amendment to clarify that waste-to-energy facilities must comply if emission limitations are made more stringent by federal regulations or by the state air pollution control permit. Reworld supports this amendment and respectfully requests that the Committees adopt this measure in its current form.

Thank you for the opportunity to provide testimony in support of HB 256 H.D.2, S.D.1.

Frazier Blaylock
Senior Director, Government Relations
Reworld (f/k/a Covanta)
4960 Fairmont Avenue #605

¹ An electronic version of the graphs can be viewed here: [Microsoft PowerPoint - 2023 Facility Performance Sheets \(final\)](#)

H-Power TTF

2023 Facility Performance



Landfill Diversion

620,000

tons of MSW processed



Enough to cover

447

Football Fields

Or, fill

75,100

garbage trucks, bumper to bumper

Energy Recovery

328,000

MWh net electricity export



Enough to power

31,000

homes for 1 year

Or, charge

76,000

Electric vehicles for 1 year

Metal Recycling

17,600

tons of ferrous metals



Equivalent to:

15,000

cars recovered from steel

Paperclip chain wrapped around the earth

27 times

1,400

tons of non-ferrous metals

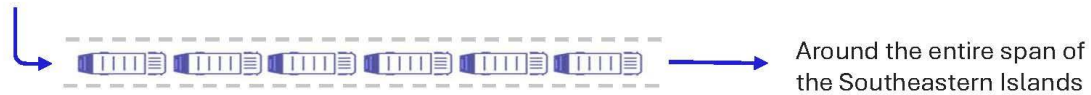
94M

aluminum cans

Energy savings from avoided metal mining:

4.3M

gallons of gasoline



Net Greenhouse Gas (GHG) Avoidance

2.4 tons

of net CO₂e avoided* for every ton of waste diverted from landfill

1.3M

metric tons of GHGs avoided



Equivalent to removing/displacing:

330,000

Vehicles from roads

1.65B

Pounds of coal

Environmental Compliance

up to

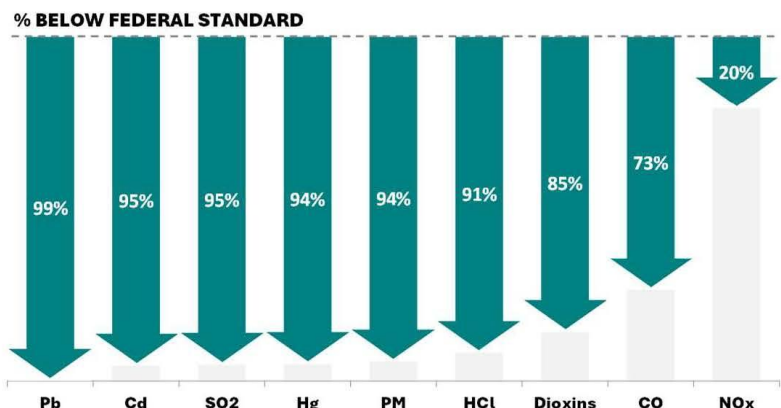
99% below

Federal emissions standards, based on annual averages**

99.98%

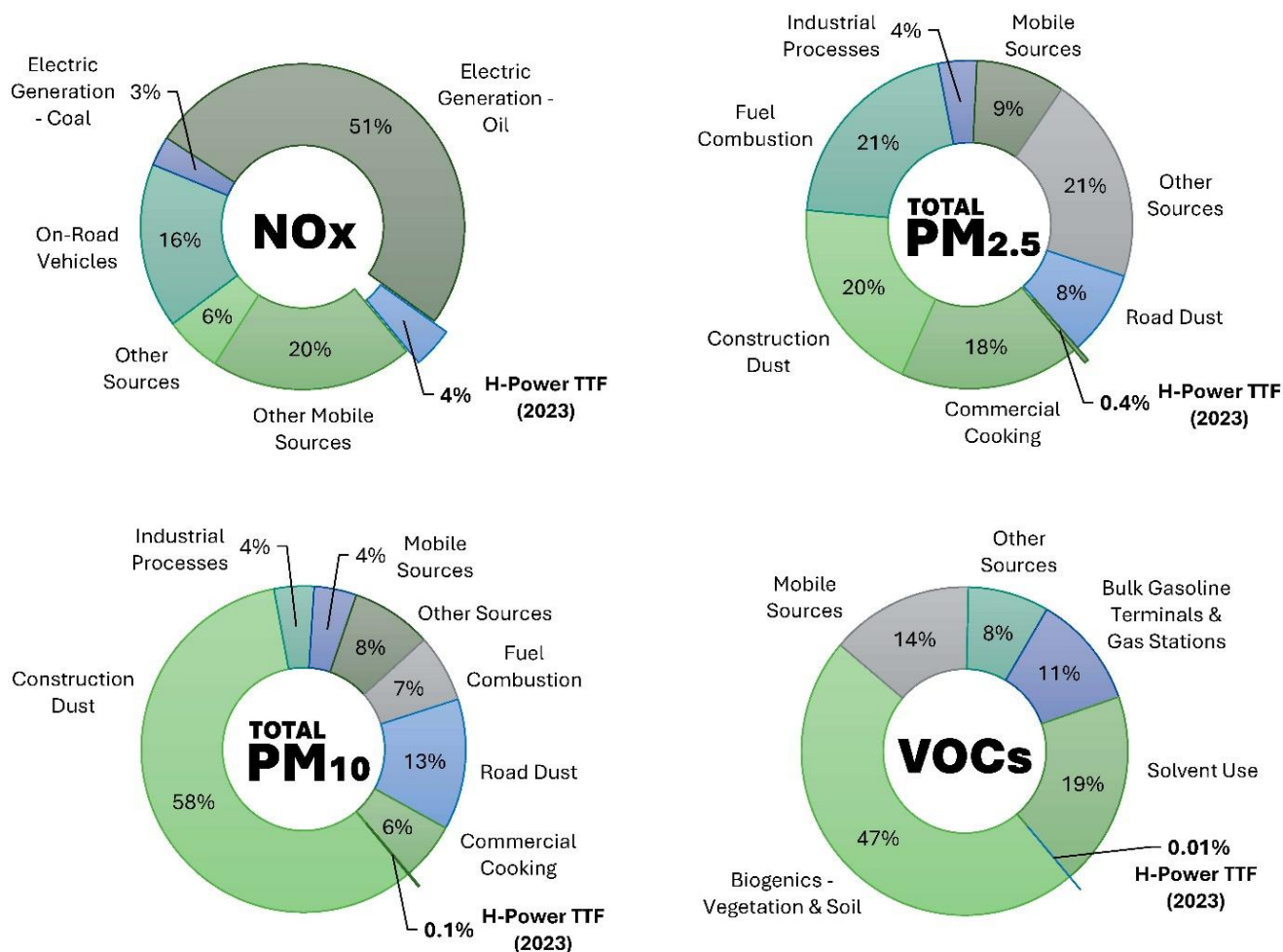
compliant

with Continuous Emissions Monitoring (CEMS) standards



How Do Our Emissions Compare to Other Sources in the County?

Local air emissions*** in Honolulu County, HI

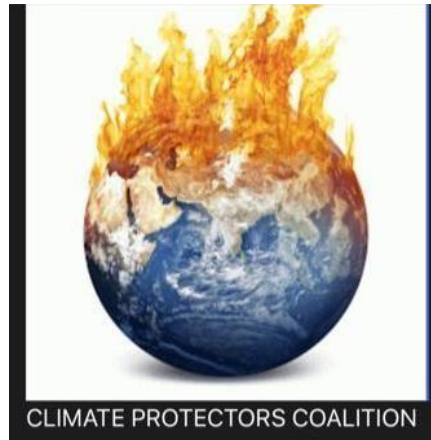


* GHGs are represented in CO₂ equivalents (CO₂e) using global warming potentials (GWPs) to compare the warming power of different gases. This analysis uses the 20-yr GWP for methane of 81 from the IPCC's 6th assessment report. TTFs in the U.S. reduce lifecycle emissions by an average of 2.4 tons of CO₂e per ton of MSW diverted from landfills. The data presented here reflects facility-specific operating data and the local electrical grid, which can differ from the national average.

** 2021-2023 Average Annual Emissions compared to federal guidelines for existing facilities (40 CFR 60 Subpart Cb). Facility may be subject to more stringent requirements by permit or in accordance with other federal guidelines.

*** Based on the 2020 US EPA National Emissions Inventory; the most recently released complete inventory. Where available, the facility's 2020 emissions were replaced with the most recently reported 2023 emissions.

LATE



To: The Honorable Senator Jarrett Keohokalole, Chair, the Honorable Senator Carol Fukunaga, Vice Chair, and Members of the Committee on Consumer Protection and Commerce.

From: Climate Protectors Hawai'i (by Ted Bohlen)

Re: Hearing HB256 HD2 SD1 RELATING TO ENVIRONMENTAL PROTECTION

Hearing: Tuesday April 1, 2025 10:07 a.m.

Aloha Chair Keohokalole, Vice Chair Fukunaga, and Members of the Committee on Consumer Protection and Commerce!

The mission of the Climate Protectors Hawai'i is to educate and engage the local community in climate change action, to help Hawai'i show the world the way back to a safe and stable climate.

The Climate Protectors Hawai'i does not oppose HB256 HD2 SD1's intent to prevent backsliding of standards, but COMMENTS and PROPOSES AN AMENDMENT!

Large trash incinerators release large quantities of toxic emissions. **H-POWER is the largest source of toxic air emissions on Oahu. Its two older burners, now 35 years old, lack two of the four emissions control devices that are required of most incinerators. They have no controls for nitrogen dioxide that triggers asthma attacks or toxic chemicals such as dioxins/furans and mercury.**

To address this air pollution and public health problem, Climate Protectors Hawai'i propose an **AMENDMENT** to be inserted before page 3, line 6:

SECTION 3. An owner or operator of a large municipal waste combustor may not operate after December 31, 2027 without having all four pollution control systems commonly used by such facilities, including activated carbon injection for control of dioxins/furans and mercury, and advanced selective non-catalytic reduction for control of nitrogen oxides.

Please make this amendment to this bill!

Mahalo!

Climate Protectors Hawai'i (by Ted Bohlen)

LATE

HB-256-SD-1

Submitted on: 3/31/2025 8:27:47 AM

Testimony for CPN on 4/1/2025 10:07:00 AM

Submitted By	Organization	Testifier Position	Testify
Keith Neal	Individual	Support	Written Testimony Only

Comments:

Support HB256 HD2 SD1

Keith Neal

Waimea