

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. Box 3378
Honolulu, HI 96801-3378
doh.testimony@doh.hawaii.gov

**Testimony COMMENTING on HB0256, HD1
RELATING TO ENVIRONMENTAL PROTECTION**

REPRESENTATIVE SCOT Z. MATAYOSHI, CHAIR
HOUSE COMMITTEE ON CONSUMER PROTECTION & COMMERCE

February 19, 2025; 2:00 PM; Room Number: 329

1 **Fiscal Implications:** Undetermined.

2 **Department Position:** The Department of Health (Department) respectfully offers comments
3 and amendments.

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

6 The Department supports the intent of this measure that proposes to prevent backsliding
7 on existing air emission limits in the event that the United States Environmental Protection
8 Agency (EPA) proposes new emission limits for waste-to-energy facilities. Typically, new federal
9 regulations increase the level of stringency placed on air pollution sources based on new
10 information, data, technologies, and lengthy and comprehensive evaluations, while this bill
11 considers the opposite. Although we are unable to predict future changes to federal air
12 regulations, the Department recognizes the benefit of preventing the relaxation of emission
13 standards in maintaining and protecting air quality.

14 With regard to whether there are any legal obstacles to carrying out this measure, we defer
15 to the Department of the Attorney General.

1 Subsequent to the previous hearing, Department staff realized that a conflict could exist
2 because the air pollution control permit for the H-POWER waste-to-energy facility already
3 includes emission limits that are more stringent than the cited federal regulations, “Standards
4 of Performance for New Stationary Sources”, as of December 31, 2024. This can occur because
5 the air permit evaluation process must consider all applicable regulations, not just those in
6 40 CFR part 60, which could result in more stringent air permit requirements. We offer
7 amendments to the measure’s current language to maintain these more stringent permit limits.

8 **Offered Amendments:** Additions appear as underlined and deletions as bracketed strikeouts;
9 page 1, line 14 to page 2, line 3:

10 “SECTION 2. An owner or operator of a waste-to-energy facility shall comply with the
11 emission limitations of the following subparts of title 40 Code of Federal Regulations part 60
12 entitled “Standards of Performance for New Stationary Sources”, as those subparts existed on
13 December 31, 2024, which are hereby incorporated by reference, unless the emission
14 limitations are made more stringent~~[, which are hereby incorporated by reference]~~ by federal
15 regulations or by their state air permit.”

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



Environmental Caucus of The Democratic Party of Hawai'i

February 15, 2025

Testimony in Support of HB256 HD1: Relating to Environmental Protection

To: Chair Scot Z. Matayoshi, Vice Chair Cory M. Chun, and Members of the Committee on Consumer Protection & Commerce

Date: Wednesday, February 19, 2025

Time: 2:00 PM

Place: Conference Room 329 & Videoconference

From: The Environmental Caucus of the Democratic Party of Hawai'i

Subject: Support for HB256 HD1 - Requiring Compliance with Certain EPA Regulations for Emission Limitations

Aloha Chair Matayoshi, Vice Chair Chun, and Members of the Committee on Consumer Protection & Commerce,

The Environmental Caucus of the Democratic Party of Hawai'i strongly supports HB256 HD1, with amendments, which requires owners or operators of waste-to-energy facilities to comply with certain United States Environmental Protection Agency (EPA) regulations for emission limitations as they existed on December 31, 2024, unless emission limitations are made more stringent. This measure is essential to protect public health and the environment from the harmful emissions produced by these facilities, particularly H-POWER.

Key Points:

- 1. Trash Incineration is Dirtier Than Coal Burning:** Trash incineration releases significantly higher levels of pollutants compared to coal burning. It emits 65% more carbon dioxide (CO₂), as much carbon monoxide (CO), three times as much nitrogen oxides (NO_x), five times as much mercury, nearly six times as much lead, and 27 times more hydrochloric acid (HCl) than coal power plants.
- 2. H-POWER's Incinerator is a Major Polluter:** H-POWER's incinerator is one of the largest industrial air polluters on O'ahu. Two of the three burners at H-POWER are 35 years old and lack two of the four pollution control systems that most incinerators have. They have no controls to reduce nitrogen oxides that trigger asthma attacks or to capture highly toxic chemicals such as dioxins and mercury.

3. **Inadequate Pollution Controls:** If H-POWER were built today, it would be illegal to operate as dirty as it currently does due to its inadequate pollution controls. This highlights the urgent need for updated regulations and stricter enforcement.

Arguments in Support:

Protecting Public Health and the Environment: Strengthening regulations for waste-to-energy facilities is crucial for safeguarding public health. The harmful emissions from H-POWER pose serious health risks, particularly for vulnerable populations such as children, the elderly, and those with respiratory conditions.

Compliance with Updated EPA Regulations: We propose an **amendment to HB256 HD1 to require that the state adopt the EPA's draft regulations for Large Municipal Waste Combustors as proposed on January 23, 2024.** While HB256 HD1 references the EPA regulations as they existed on December 31, 2024, adopting the draft regulations proposed on January 23, 2024, would ensure that facilities like H-POWER adhere to the latest standards for controlling emissions and protecting air quality.

Addressing Long-Standing Environmental Concerns: The Clean Air Act regulations that HB256 HD1 aims to protect are from 2006. The U.S. Environmental Protection Agency is required to update these regulations every five years but had to be sued (under the Biden administration) to update them. A federal court required that they be updated by December 2024, but before President Trump took office, it was agreed to delay this by a year. At best, new regulations would be in effect by 2029 if not further delayed by the Trump administration.

We believe that adopting the EPA's draft regulations and strengthening the existing standards for waste-to-energy facilities like H-POWER is essential for protecting the health and well-being of our community. We urge the Committee to favorably consider HB256 HD1 and support its passage with the proposed amendments.

Sincerely,

Melodie Aduja and Alan Burdick

Co-chairs, Environmental Caucus of the Democratic Party of Hawai'i

HB-256-HD-1

Submitted on: 2/18/2025 12:24:39 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
laurel brier	Kauai Climate Action Coalition	Comments	Written Testimony Only

Comments:

This bill SHOULD be used to strengthen standards at H-POWER on Oahu but it literally does nothing and why the company running the facility has testified in favor. This is an opportunity to strengthen our environmental protections when they are under attack from the Trump administration. This facility is unsatisfactory, substandard and an environmental nuisance to the community. Let's raise the bar and **amend HB256** so that it actually does address the current environmental issues with H-POWER on Oahu, currently one of the largest industrial air polluters on Oahu. This bill should require updated standards be adopted at the very least.

Comments before
February 19, 2025 House Committee on
Consumer Protection and Commerce

COMMENTS WITH AMENDMENTS

House Bill 256

Relating to Trash Incinerator Regulations

Mike Ewall, Esq.
Founder & Director
Energy Justice Network
215-436-9511
mike@energyjustice.net
www.EnergyJustice.net

Aloha Honorable Committee members. Energy Justice Network is a national organization supporting grassroots groups working to transition their communities from polluting and harmful energy and waste management practices to clean energy and zero waste solutions. In Hawai'i, we've been working with residents who first sought our support in 2015. Since mid-2022, we have supported residents in forming the Hawai'i Clean Power Task Force and Kōkua nā 'Āina to address numerous energy and waste issues in the state.

We urge that you adopt the following amendment to HB 256.

AMENDMENT:

SECTION 2. An owner or operator of a large municipal waste combustor ~~waste-to-energy facility~~ shall comply with the emission limitations for Large Municipal Waste Combustors as proposed by the U.S. Environmental Protection Agency on January 23, 2024 ~~of the following subparts of title 40 Code of Federal Regulations part 60 entitled "Standards of Performance for New Stationary Sources", as those subparts existed on December 31, 2024,~~ unless emission limitations are made more stringent by federal regulation or by the Hawaii Department of Health, which are hereby incorporated by reference:

This is important for two reasons:

- 1) The existing emissions limits in the air permit issued by the Hawaii Department of Health for Unit 3 (the newest of three burners at the H-POWER trash incinerator) are already stricter than the current federal regulations. **HB 256 risks weakening the standards for this burner unless amended.**
- 2) The current (outdated) federal regulations are from 2006. The overdue new regulations will likely be delayed by the Trump administration, and should be adopted by the state.

This bill would literally do nothing to protect air emissions standards, which is why Reworld, the operator of the H-POWER trash incinerator, is comfortable supporting it. It could *weaken* them, but will not maintain or strengthen them. HB 256 ought to strengthen the weak and outdated standards that currently exist.

Two of the three burners at H-POWER are 35 years old and are totally missing two of the four pollution control systems that most incinerators have. They are missing the pollution controls which reduce the nitrogen oxides (NOx) that trigger asthma attacks; these controls are called

selective non-catalytic reduction (SNCR). They are also missing the pollution controls that capture the most toxic chemicals such as dioxins and mercury; these are called activated carbon injection (ACI). The newer (third) burner at H-POWER has these, but the two old units totally lack them. **Any bill purporting to be about incinerator air pollution should require that these missing controls be installed, which EPA's [regulations for Large Municipal Waste Combustors](#) proposed in January 2024 would require.**

Keeping the status quo going means that the H-POWER incinerator will continue to be one of the largest industrial air polluters on O'ahu. If H-POWER were built today, it would be illegal to operate as dirty as they are. This bill should require that the updated standards be adopted by the state since they may not happen at all under the Trump administration.

BACKGROUND

The Clean Air Act regulations that HB 256 aims to protect are from 2006. The U.S. Environmental Protection Agency is required to update these regulations every five years, but had to be sued (under the Biden administration) to update them. A federal court required that they be updated by December 2024, but before Trump took office, it was agreed to delay this by a year. At best, new regulations would be in effect by 2029 if not further delayed by the Trump administration.

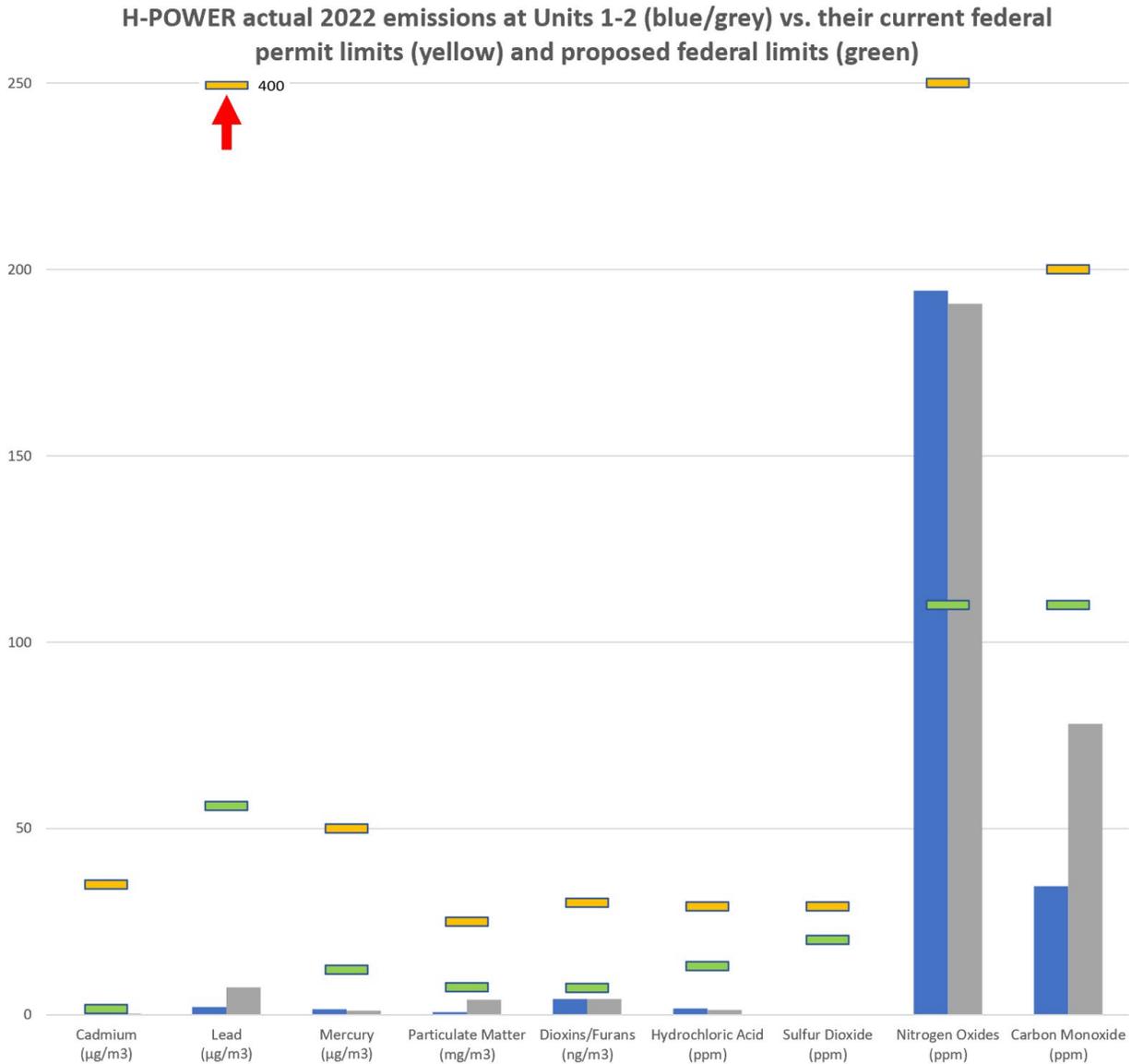
The regulations proposed by the Biden administration were the weakest of three proposed options for 8 of 9 pollutants, and they picked the middle-option for the nitrogen oxides that trigger asthma attacks.

It is not enough to simply reinforce the existing regulations which are so weak that H-POWER manages to be one of the largest air polluters on O'ahu, and is allowed to operate with two of four pollution control devices missing on two of their three burners.

To weaken the existing regulations, the Trump administration would have to go through a lengthy regulatory process in violation of a court order to revisit and strengthen these regulations. The new regulations that almost came out under the Biden administration would have allowed states about four years to implement after EPA's final regulations are finalized. States issue the air pollution permits, not the federal government. By the time a new rule could be completed, survive litigation, and then be implemented by states, we'd be in a new presidential administration that would likely reverse it, anyway. Also, states are allowed to have stricter air regulations than the federal minimums, so Hawai'i would not have to weaken its permit for H-POWER in any case unless HB 256 stays as is and is interpreted to mean that the more protective limits on Unit 3 must be rolled back to the current (old) federal standards.

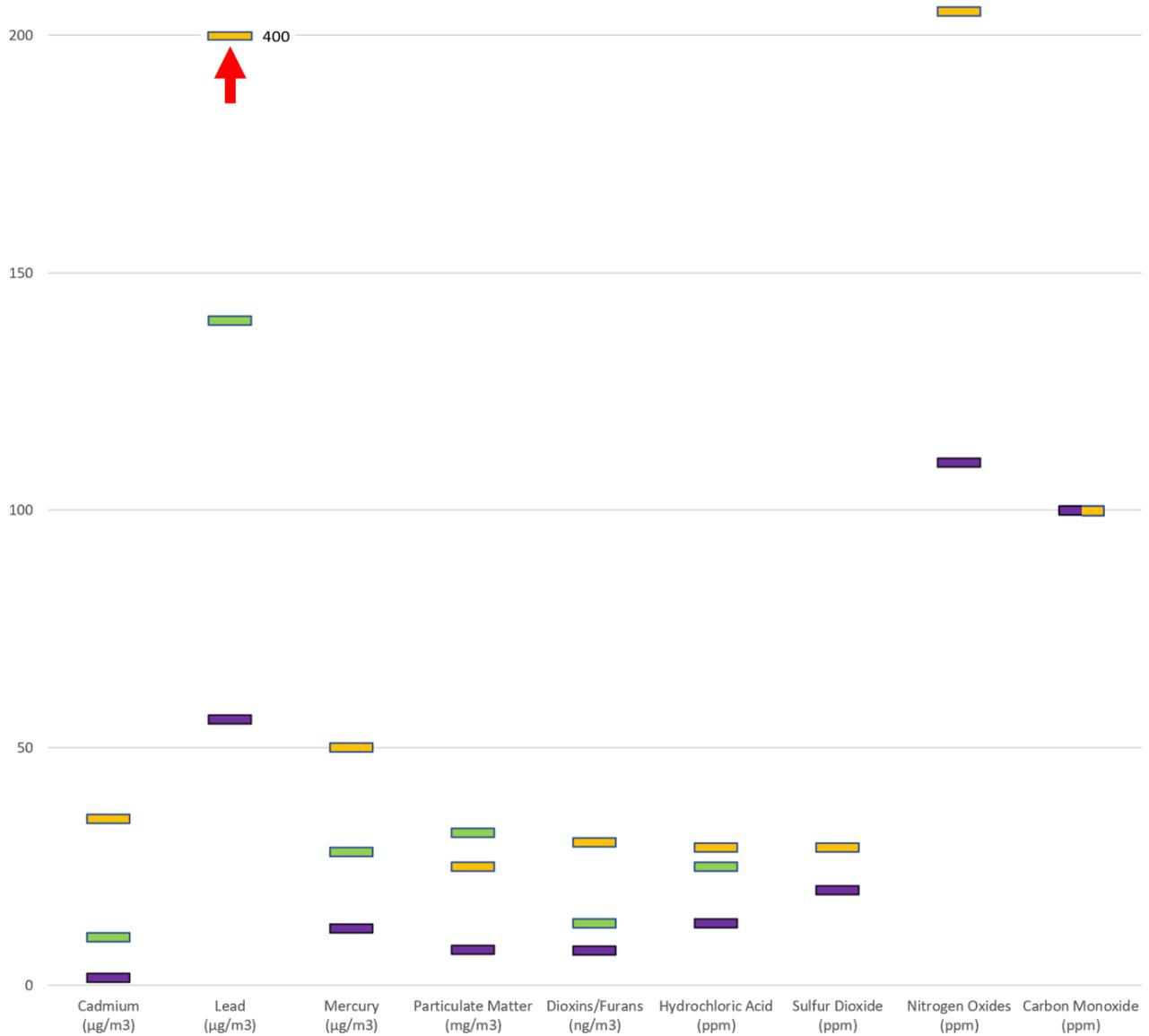
Units 1 and 2 (which came online in November 1989) burn refuse-derived fuel (processed trash) and are held to weaker standards because of the age of the facility as well as the fact that they burn this form of trash. Unit 3 (which came online in February 2013) is a "mass burn" facility, meaning that they burn unprocessed trash directly.

The following two charts illustrate the major differences between the current (2006) federal regulations and the new ones proposed in January 2024. The bill as it stands would maintain the yellow bars as limits. The amendment we propose would adopt the proposed new federal limits expressed in the green bars, which would require that H-POWER install the missing controls needed to reduce emissions of nitrogen oxides that trigger asthma attacks.



H-POWER's Unit 3 already has permit limits stronger than the current (2006) federal regulations (in purple). HB 256 risks repealing these and rolling them back to the yellow limits. The amendment we propose would adopt the proposed new federal limits expressed in the green bars.

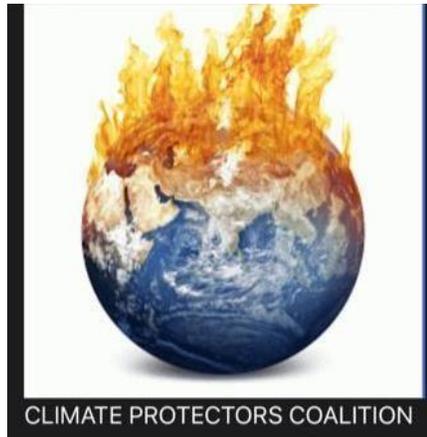
H-POWER Unit 3 permit emissions limits



Yellow bar: Current (2006) Federal standards for existing large trash incinerators

Green bar: H-POWER permit limit for Unit 3

Purple bar: Proposed (2024) Federal standards for existing large trash incinerators



To: The Honorable Representative Scot Matayoshi, Chair, the Honorable Cory Chun, Vice Chair, and Members of the Committee on Consumer Protection and Commerce.

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

Re: Hearing HB256 HD1 RELATING TO ENVIRONMENTAL PROTECTION

Hearing: Wednesday February 19, 2025 2:00 p.m.

Aloha Chair Matayoshi, Vice Chair Chun, 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 COMMENTS ON HB256 HD1 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 and mercury.

States are allowed by law to have stricter air emissions than the federal rules. **In order to protect Oahu residents from toxic air emissions, Hawai'i rules for large incinerators should be made more protective, not less protective.**

Climate Protectors Hawai'i **PROPOSES that the bill be amended to require that the state adopt EPA's draft regulations for Large Municipal Waste Combustors as proposed on January 23, 2024.** These limits are more appropriate than the EPA's watered down December 2024 proposed limits that have not gone into effect and are unlikely to do so, given the change in administration at EPA. The December 2024 proposed regulations were the weakest of three proposed options for 8 of 9 pollutants. At best, new federal regulations would not be in effect until 2029 or later if delayed by

the Trump administration. **The State needs to act to protect its residents from toxic incinerator emissions.**

We urge the committee to adopt the following amendment to HB 256 HD1.

AMENDMENT:

SECTION 2. An owner or operator of a large municipal waste combustor waste-to-energy facility shall comply with the emission limitations for Large Municipal Waste Combustors as proposed by the U.S. Environmental Protection Agency on January 23, 2024 of the following subparts of title 40 Code of Federal Regulations part 60 entitled “Standards of Performance for New Stationary Sources”, ~~as those subparts existed on December 31, 2024~~, unless emission limitations are made more stringent by federal regulation or by the Hawaii Department of Health, in which case those new more stringent limitations shall apply.

Unless this amendment is made, HB 256 HD1 risks weakening the standards for H-POWER 3 if its limits in the DOH permit are below the federal Limits. The amendment proposed above is appropriate and should be adopted by the state, where federal rules will not go into effect until at least 2029 or later if delayed by the Trump administration. **Without an amendment, this bill would literally do nothing to protect air emissions standards. It could weaken them, but will not maintain or strengthen them. HB 256 HD2 ought to strengthen the weak and outdated standards that currently exist.**

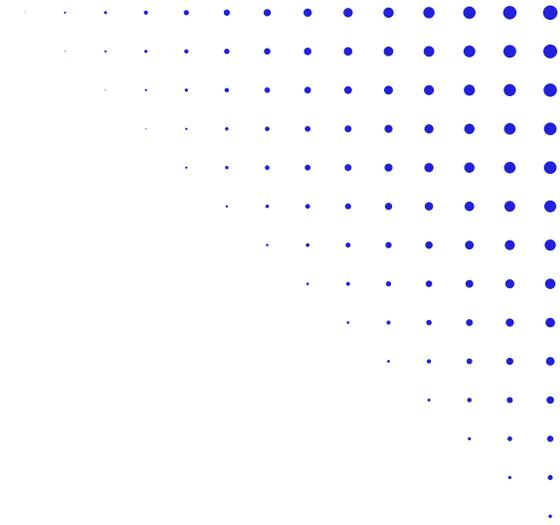
Please pass this bill **with the proposed amendment to require State adoption of EPA’s proposed regulations for Large Municipal Waste Combustors from January 23, 2024.**

Mahalo!

Climate Protectors Hawai'i (by Ted Bohlen)



445 South Street
Morristown, NJ 07960
862.345.5000



February 19, 2025

Honorable Scot Z. Matayoshi, Chair
Honorable Cory M. Chun, Vice Chair
and Members of the Committee
Hawaii State House of Representatives
Committee on Consumer Protection & Commerce

Re: Testimony in **SUPPORT** of House Bill 256 H.D.1 with proposed amendments

Aloha Chair Matayoshi, Vice Chair Chun, and Members of the Committee:

Reworld supports HB 256 H.D.1, which 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.

Reworld does not oppose the previously adopted amended language offered by the Department of Health provided that the following clarifying language (bolded and underscored) is added to Section 2, page 1, as follows:

SECTION 2. An owner or operator of a waste-to-energy facility shall comply with the emission limitations of the following subparts of title 40 Code of Federal Regulations part 60 entitled “Standards of Performance for New Stationary Sources”, as those subparts existed on December 31, 2024, unless emission limitations are made more stringent **by the United States Environmental Protection Agency through its formal rulemaking process**, which are hereby incorporated by reference:

Reworld respectfully requests the Committee adopt HB 256 H.D.1 with the aforementioned amendment.

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 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, 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. Therefore, Reworld respectfully requests this Committee adopt this measure.

Thank you for the opportunity to provide testimony in support of HB 256 H.D.1 and our proposed amendment to the bill.

Frazier Blaylock
Senior Director, Government Relations
Reworld (f/k/a Covanta)
4960 Fairmont Avenue #605
Bethesda, MD 20814

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

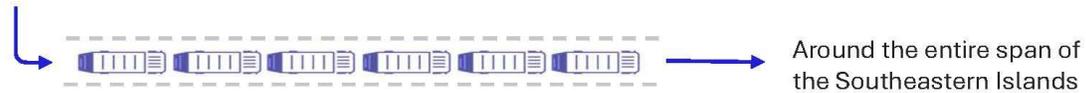
Equivalent to:
15,000
cars recovered from steel

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

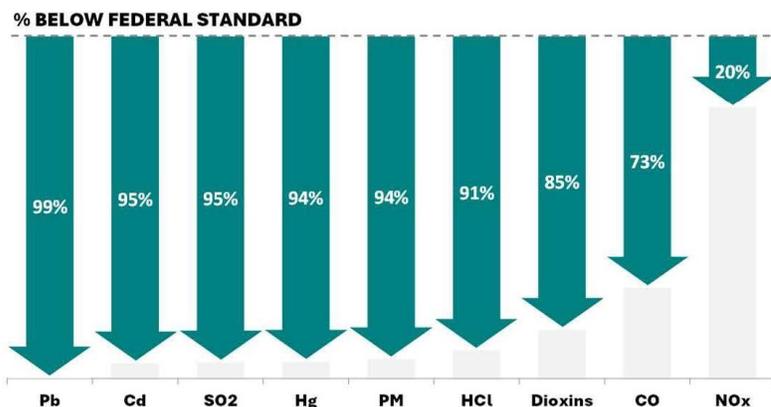
1.3M
metric tons of GHGs avoided

Equivalent to removing/displacing:
330,000
Vehicles from roads
1.65B
Pounds of coal

Environmental Compliance

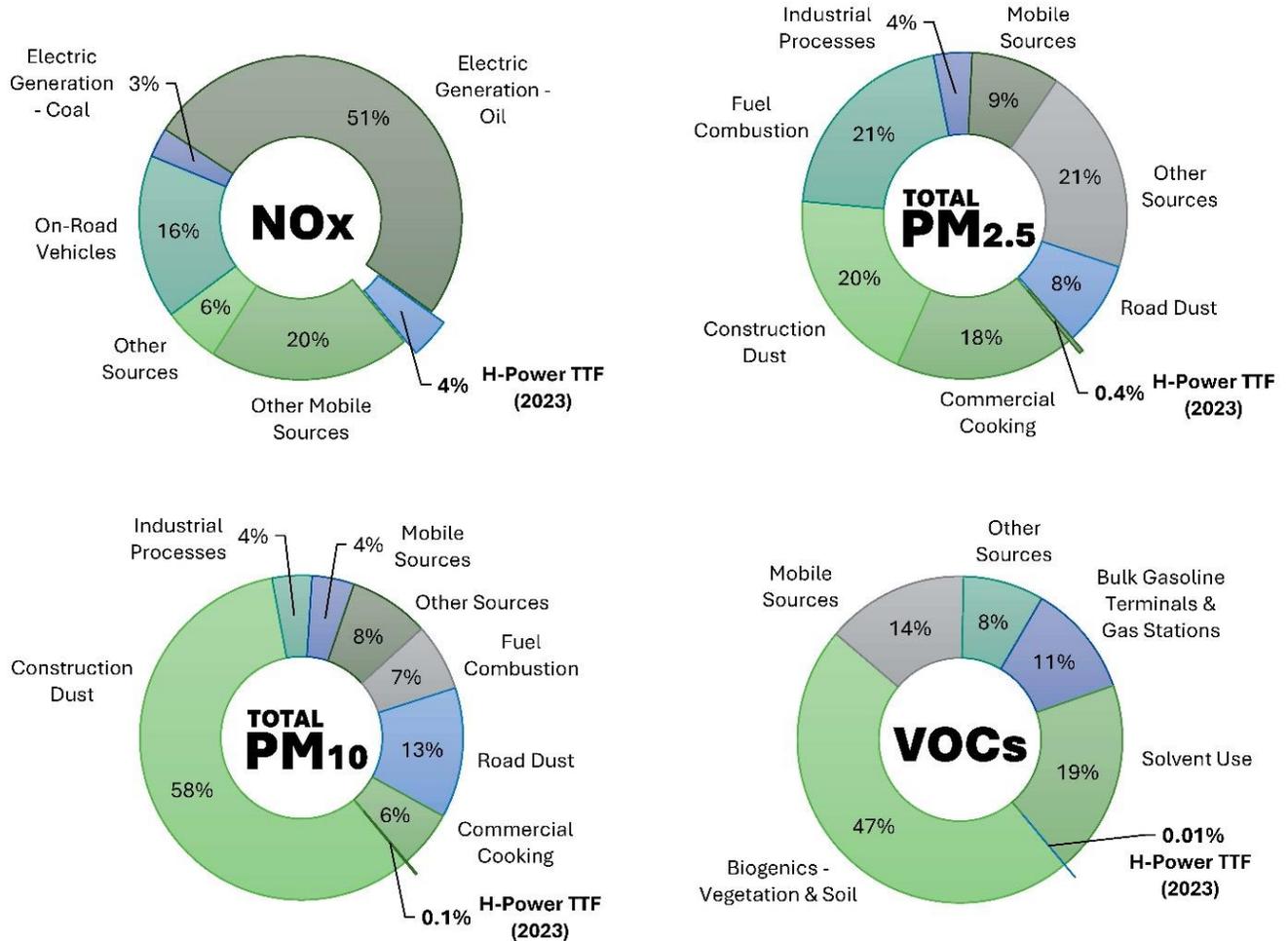
up to
99% below
Federal emissions standards, based on annual averages**

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.

HB-256-HD-1

Submitted on: 2/17/2025 12:07:42 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Shannon Rudolph	Individual	Support	Written Testimony Only

Comments:

Support. Even if the bill does nothing to improve or strengthen our standards. :(
Sounds like another shameful bait & switch. :(

HB-256-HD-1

Submitted on: 2/17/2025 4:36:47 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Mary True	Individual	Support	Written Testimony Only

Comments:

Please amend HB 256! As it stands, it would accomplish nothing, as states are already allowed to be stricter than federal regulations. This is why Reworld (the operator of H-POWER) supports this ineffective bill. Please amend it to strengthen our standards so that the H-POWER trash incinerator has to install the air pollution controls they've been missing for 35 years. The older two burners at the plant have NO controls for the nitrogen oxides that trigger asthma attacks, and NO controls for the most toxic chemicals they release: dioxins and mercury. Please amend the bill to require that the state adopt EPA's draft [regulations for Large Municipal Waste Combustors](#) as proposed on 1/23/2024.

HB-256-HD-1

Submitted on: 2/17/2025 9:16:09 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Robert Culbertson	Individual	Comments	Written Testimony Only

Comments:

Aloha Representatives!

HB 256, as it stands, would accomplish nothing, as states are already allowed to be stricter than federal regulations. This is why Reworld (the operator of H-POWER) supports this ineffective bill. Please amend it to strengthen our standards so that the H-POWER trash incinerator has to install the air pollution controls they've been missing for 35 years. The older two burners at the plant have NO controls for the nitrogen oxides that trigger asthma attacks, and NO controls for the most toxic chemicals they release: dioxins and mercury. Please amend the bill to require that the state adopt EPA's draft [regulations for Large Municipal Waste Combustors](#) as proposed on 1/23/2024.

Mahalo,

R A Culbertson

Honokaa

HB-256-HD-1

Submitted on: 2/17/2025 10:03:56 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Brian Piotrowski	Individual	Comments	Written Testimony Only

Comments:

HB 256, as it stands, would accomplish nothing, as states are already allowed to be stricter than federal regulations. This is why Reworld (the operator of H-POWER) supports this ineffective bill. Please amend it to strengthen our standards so that the H-POWER trash incinerator has to install the air pollution controls they've been missing for 35 years. The older two burners at the plant have NO controls for the nitrogen oxides that trigger asthma attacks, and NO controls for the most toxic chemicals they release: dioxins and mercury. Please amend the bill to require that the state adopt EPA's draft [regulations for Large Municipal Waste Combustors](#) as proposed on 1/23/2024.

HB-256-HD-1

Submitted on: 2/18/2025 9:22:23 AM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Phaethon Keeney	Individual	Comments	Written Testimony Only

Comments:

Aloha esteemed Legislators!

Please amend HB256 to bring our trash incineration standards up to date, we have not much land or water to spare for toxic pollution. Hawaii should at minimum adopt the EPA's draft [regulations for Large Municipal Waste Combustors](#) as proposed on 1/23/2024, this change is inevitable shortly as the minimum agreed States should do, and no reason to delay, every day we have an opportunity to protect Hawaii to the best of our ability it should be taken, the 'āina & the people thank you!

Mahalo, Phaethon Keeney, Honokaa Hawaii

HB-256-HD-1

Submitted on: 2/18/2025 10:49:59 AM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Diane Ware	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Committee Members,

HB 256, as it stands, would accomplish nothing, as states are already allowed to be stricter than federal regulations. This is why Reworld (the operator of H-POWER) supports this ineffective bill. Please amend it to strengthen our standards so that the H-POWER trash incinerator has to install the air pollution controls they've been missing for 35 years. The older two burners at the plant have NO controls for the nitrogen oxides that trigger asthma attacks, and NO controls for the most toxic chemicals they release: dioxins and mercury. Please amend the bill to require that the state adopt EPA's draft [regulations for Large Municipal Waste Combustors](#) as proposed on 1/23/2024.

It is not enough to simply reinforce the existing regulations which are so weak that H-POWER manages to be one of the largest air polluters on O'ahu, and is allowed to operate with two of four pollution control devices missing on two of their three burners.

I, Diane Ware, urge you to amend or kill this bill.

Volcano 96785

LATE

HB-256-HD-1

Submitted on: 2/18/2025 2:44:47 PM

Testimony for CPC on 2/19/2025 2:00:00 PM

Submitted By	Organization	Testifier Position	Testify
arleen velasco	Individual	Oppose	Written Testimony Only

Comments:

The Trump administration will most likely weaken or eliminate EPA requirement for incinerators like the H-Power facility. The state needs to adopt standards that are consistent with current EPA regulations. H-Power does not have sufficient filtering to reduce hazardous emissions and is one of the largest air polluters in Oahu. Do not adopt this bill as written. Straighten the state requirement and help save our air quality.