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Written Testimony of Christopher Phelps, Program Director  
Before the Connecticut General Assembly Environment Committee

Monday, March 16, 2009

Written testimony opposing Raised Senate Bill 1084, An Act Expanding The Definition  
Of A Class I Renewable Energy Source To Include Biosludge Or Biosolids.

Senator Meyer, Representative Roy, and members of the Committee:

Environment Connecticut submits this testimony opposing Raised Senate Bill 1084 in its current form. This bill would create a dangerous precedent by including polluting combustion of biosolids and biosludge (sludge) in the "clean" Class I tier of Connecticut's Renewable Portfolio Standard.

Connecticut's RPS includes multiple tiers of energy sources. The Class I tier includes the cleanest energy sources such as wind and solar. The amount of electricity utilities are required to procure from these cleanest sources increases over time in order to incentivize the creation of new, clean renewable electric generation serving Connecticut. Class II is the "dirty" tier of the RPS and includes generation sources that are polluting, such as Municipal Solid Waste incineration but which, for waste management policy purposes unrelated to clean energy incentives, Connecticut has chosen to incentivize through the RPS. The Class II tier is also capped, and for good reason, in order to ensure that the RPS prioritizes increased generation of electricity from truly clean and renewable sources such as those included in the current Class I definition.

Sludge not a clean or renewable resource and should not be considered for inclusion in the Class I RPS definition. If this change was made, it would create the potential for sludge incineration and gasification to "crowd out" clean renewable energy sources from the RPS. If the General Assembly believes that waste management or other policy considerations call for incentivizing incineration or gasification of sludge, then we suggest that the current design of Connecticut's RPS makes inclusion of sludge gasification in the Class II RPS tier the logical method of achieving this goal.

However, if such a course of action were taken, it is important that the current cap on Class II's share of overall energy procurement be retained in order to maintain the RPS's emphasis on incentivizing clean, renewable energy. Likewise, combustion of sludge should be excluded from any tier of the RPS as it carries much more potential for polluting emissions than are associated with gasification. Additionally, strict limitations should be placed upon the emissions associated with any sludge gasification within the Class II tier.

Sewage sludge can contain many hazardous contaminants that pose significant environmental threats when combusted. These contaminants can include, heavy metals such as mercury and

copper, as well as toxic chemicals such as dioxins. The combustion process releases pollutants into the air, and produces ash as a waste byproduct that must then be disposed of in landfills. This ash contains higher concentrations of metals and other toxic contaminants and is therefore even more hazardous.

In short, sludge incineration releases toxic pollutants into the air as a direct consequence of the combustion process, and into the ground and water as a direct consequence of ash disposal. Therefore, incineration of sludge, "biosolids," or "biosludge," is an inherently polluting activity and as such, should not be incentivized through the Connecticut RPS.

Finally, ratepayer impacts of inclusion of sludge, "biosolid," or "biosludge" incineration or gasification within the RPS should be taken into consideration by the committee. As we have noted, the RPS is designed to incentivize production of new, clean, renewable energy sources serving Connecticut. However, the incremental costs associated with this incentive are ultimately paid by electric ratepayers. Therefore, it is vital that the RPS retain its emphasis on incentivizing clean, renewable electric generation sources and not become a vehicle for incentivizing polluting sources as well. It would be unfair to ratepayers to require them to subsidize polluting electric generation sources, such as sludge incineration, while simultaneously undermining RPS incentives for new solar, wind, sustainable biomass, and other clean renewable electric generation source.

Environment Connecticut urges the committee to reject Senate Bill 1084 as proposed on the grounds that it would severely undermine Connecticut's RPS by promoting a polluting electric generation source at the expense of clean, renewable energy.

If the committee does decide to move forward with this bill, we respectfully submit the following recommendations:

- No combustion or incineration of sludge, "biosolids," or "biosludge" should be allowed to qualify for the Class I or Class II tiers of the Connecticut Renewable Portfolio Standard.
- Gasification of sludge, "biosolids," or "biosludge" could be considered for inclusion in the "dirty" Class II RPS tier.

Sincerely,

Christopher Phelps  
Program Director  
Environment Connecticut