



# CLEAN WATER ACTION

CONNECTICUT

## Testimony of Roger Smith, Campaign Director, Clean Water Action Environment Committee January 31, 2011

Testimony in opposition to Raised S.B. No. 839

### *AN ACT DEFINING BIOSOLIDS AS A CLASS I RENEWABLE ENERGY SOURCE*

Clean Water Action is an environmental non-profit with 24,000 Connecticut members. We have worked on energy-related issues in Connecticut since 1998, and have worked to support renewable energy at the state level and in towns through the 20% by 2010 clean energy campaign.

Clean Water Action opposes SB 839. The bill as drafted adds “waste heat from a public wastewater treatment plant” to the definition of Class I renewable energy, putting it on par with wind, solar and other clean technologies. This proposal is an egregious example of “program shopping” as waste heat recovery *already* has its own class in the renewable portfolio standard, Class III. Class III includes “a waste heat recovery system installed on or after April 1, 2007, that produces electrical or thermal energy by capturing preexisting waste heat or pressure from industrial or commercial processes.” Waste water treatment plants should not be allowed to choose whether to qualify for Class I or Class III credits (or both) based on which pays the highest price.

While the bill language does not mention it, the bill title also suggests adding sewage sludge (aka “biosolids”) as a Class I renewable energy resource. We strongly oppose this on environmental grounds. Unlike other clean Class I renewables, sludge contain tremendous quantities of heavy metals, sludge management is a waste rather than an energy issue, and burning or gasification of sludge results in higher toxics and greenhouse gas emissions than alternatives like anaerobic digestion.

According to the US EPA, sludge contains cadmium, lead and mercury in even higher concentrations than found in coal, the dirtiest of the fossil fuels. **These heavy metals are neurotoxins and extremely dangerous to human health in *grams*, not tons.** Without far more stringent restrictions on metals content than the weak US EPA limits for biosolids, this is not a clean energy source on par with wind or solar.

*Exhibit 3: Composition of Municipal Wastewater Treatment Sludges*

Element	Wastewater Treatment Sludge		Coal (mg/kg)
	40-City Study (1980) mg/kg dry weight	National Sewage Sludge Study (1989) mg/kg dry weight	
Arsenic	9.9	6.7	10
Cadmium	69	6.9	0.5
Chromium	429	119	20
Copper	602	741	Not available
Lead	369	134.4	40
Mercury	2.8	5.2	0.1
Molybdenum	17.7	9.2	Not available
Nickel	135.1	42.7	20
Selenium	7.3	5.2	1
Zinc	1,594	1,202	Not available
<b>Sources:</b> NBP 2005, pp. 3-1 to 3-2 and EPA 1998, p. 1-5			

<http://www.epa.gov/epawaste/nonhaz/define/pdfs/wwt-sludge.pdf>

Additionally, we ask the legislature to protect the integrity of Class I renewable energy sources. The Renewable Portfolio Standard (RPS) can only deliver on its goal of creating financial incentives to build more renewable energy if the definitions remain stable. The more types of energy that qualify for Class I, the less the incentive for any given project, as a glut of supply floods the market. Unfortunately, RPS definitions have been changed by the legislature or DPUC nearly every year. Currently Class I renewable energy prices are lower than they have been in years (down more than 60% over the past 6 years) in part due to Connecticut's continually expanding definition of what qualifies as renewables. Further broadening the definitions will depress the incentive all renewable energy projects receive.

Thank you for your consideration,

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