SIERRA CLUB
MARYLAND CHAPTER

Sierra Club Maryland Chapter
P.O. Box 278
Riverdale, MD 20738
(301) 277-7111

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Transmitted via email to shannon.heafey@maryland.gov

Ms. Shannon Heafey
Air and Radiation Administration
Maryland Department of the Environment
1800 Washington Boulevard, Suite 720
Baltimore, Maryland 21230-1720

RE: Draft Air Quality Renewal Title V/Part 70 Operating Permit for the Wheelabrator/BRESCO Facility

Dear Ms. Heafey,

The Sierra Club Maryland Chapter opposes the issuance of an air quality Title V/Part 70 Operating Permit for the Wheelabrator (now WIN Waste Innovations) Baltimore LP facility. Should the permit nevertheless be issued by the Maryland Department of the Environment (MDE), we request that independent continuous monitoring of particulate matter, mercury, lead, hydrochloric acid, dioxins, and furans be required going forward.[1]

This facility, also known as the Baltimore Refuse Energy Systems Company (BRESCO), opened in 1985. Nationally, most incinerators are retired within 30 years due to higher maintenance costs and increased risk of fires; however, this facility is now in its fifth decade. While there has been investment in recent years to reduce emissions from this facility, the improvements fall far short of the standards for new waste incinerators today. Only by grandfathering this incinerator under lesser standards is it able to meet the weakened E.P.A. standards under the current administration.

A recently released joint study from Johns Hopkins University and the University of Maryland estimated the health damage inflicted by BRESCO from four incineration air pollutants—particulate matter (PM), nitrogen oxides (NOx), sulfur dioxide (SO2) and carbon monoxide (CO)—at $53.8 million annually.[2] This cost is primarily borne by residents and workers in our state, especially those who live or work in Baltimore City and Baltimore and Harford Counties who breathe air that fails to meet the E.P.A. federally mandated standards

[1] Delkash, M. Air Emissions from Combustion and Incineration Processes: Insights into Air Quality and US EPA Regulations. *Water Air Soil Pollut* **237**, 104 (2026). https://doi.org/10.1007/s11270-025-08765-7.
[2] Tu KJ, Heaney CD, Sawtell G, Sanchez C, Salmerón B, Aubourg MA, DasSarma S. Health damages and disparities from municipal and medical waste incineration in Baltimore, USA. *medRxiv* [Preprint]. 2025 Jul 3:2025.06.27.25330313. doi: 10.1101/2025.06.27.25330313. PMID: 40630600; PMCID: PMC12236935.

of air quality and with "F" scores on air quality according to the American Lung Association.[3]

The aforementioned study did not assess the health impacts of the numerous other toxins emitted by BRESCO. In the most recent EPA National Emissions Inventory, BRESCO was the top industrial emitter of mercury in our region, producing 77% of all such mercury emissions in Baltimore City and Baltimore County combined, as well as 46% of arsenic emissions and 58% of lead emissions.[4] Mercury is a severe neurotoxin that accumulates in the body, causing irreversible damage to the brain, kidneys, and nervous system and is particularly harmful to unborn babies and young children. It also poisons our waters, wildlife, and our seafood, including our prized striped bass or rockfish. Similarly, there is no safe level of lead, another harmful neurotoxin, which causes permanent health harm and disabilities. As documented in the Maryland Lead Registry Annual Surveillance 2024 Report, pediatric lead exposure remains an ongoing public health issue in Baltimore.[5] The incinerator is also a source of dioxins and furans, PFAS and other toxic heavy metals like cadmium, all of which accumulate in the body and cause severe health effects.[6]

In addition to the air quality concerns, we are also concerned with the disposal of toxic ash, a byproduct of incineration, at the Eastern Landfill in Baltimore County and Quarantine Road Landfill in Baltimore.[7] Ash disposal is extremely problematic because of the toxins contained in incinerator ash and its high flammability, particularly in landfills that capture methane.[8] Should the ash be handled incorrectly, a landfill fire could create exceptionally dangerous leachate with high levels of carcinogenic benzene. A landfill fire would be dangerous, extremely costly to manage, nearly impossible to extinguish, and open BRESCO, Baltimore City and County and the State to liability.

Sierra Club is the oldest and largest grassroots environmental group in the United States, with hundreds of thousands of members nationally, including more than 17,000 members in Maryland, many of whom live, work, and recreate in areas negatively impacted by air pollution from the BRESCO incinerator. Sierra Club and its members are greatly concerned

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[3] American Lung Association, State of the Air https://www.lung.org/research/sota/city-rankings/states/maryland/baltimore.
[4] U.S. EPA Get Air Emissions Data https://www.epa.gov/air-emissions-inventories/get-air-emissions-data-0.
[5] Lead Registry Annual Surveillance 2024 Report, Maryland Department of the Environment, submitted April 2, 2026, Maryland General Assembly, Reporting Period Fiscal Year 2024, https://mde.maryland.gov/programs/land/Documents/Lead%20Registry%20Annual%20Surveillance%202024%20Report.pdf.
[6] Dioxins, Aug. 11, 2026, World Health Organization, https://www.who.int/news-room/fact-sheets/detail/dioxins-and-their-effects-on-human-health.
[7]Shen, Fern, Citing toxic ash, residents again call for the BRESCO incinerator to be shut down, *Baltimore Brew,* Oct.5, 2026. https://baltimorebrew.com/2026/10/05/part-1-citing-toxic-ash-residents-again-call-for-the-bresco-incinerator-to-be-shut-down/.
[8] Villarruel-Moore, A. et al., Incinerator ash characterization – Implications for elevated temperature landfills, Waste Management, Volume 153, 2022, Pages 72–80, https://doi.org/10.1016/j.wasman.2022.08.017.

about the effects of air pollution on human health and the environment and have a long history of involvement in activities related to air quality and permitting of air pollution sources.

In sum, reliance on this antiquated incinerator is unhealthy and fails to move our State into more sustainable 21st century waste management. Maryland should be better than this. **The Maryland Chapter of the Sierra Club strongly urges MDE to deny this new air permit. If issued, we ask that it be subject to continuous monitoring of particulate matter, mercury, lead, hydrochloric acid, dioxins, and furans.**

Respectfully,

Marie LaPorte
Biodiversity & Natural Places Chair
and Greater Baltimore Group
Conservation Chair
Sierra Club Maryland Chapter
marielaporte@verizon.net

Martha Ainsworth
Chapter Zero Waste Chair

Josh Tulkin
Chapter Director

Cc:
Christopher Hoagland, Director, Air and Radiation Administration, MDE