



March 19, 2024

The Honorable President and Members of the Baltimore City Council
City Hall, Suite 400
100 N. Holliday Street
Baltimore, MD 21202

RE: Council Bill Resolution 23-0201R- Informational Hearing Medical Waste Incinerators

Dear Honorable City Councilmembers,

Johns Hopkins Hospital, Johns Hopkins Bayview Medical Center and Johns Hopkins University are committed to sustainability and are engaged in a broad range of sustainability measures across the institution. This includes efforts to reduce waste and maximize waste diversion, in addition to other areas of sustainability.

Accounting for the community impacts of our operational decisions is something we take very seriously and during the university's recent Climate Action and Sustainability Plan development process, the university established a Community Advisory Group to provide input from Baltimore City residents and leaders on a number of community and environmental justice issues. This Advisory Group helped shape the Plan's vision focusing on advancing healthy, just, and sustainable environments in our communities and around the world. Members of this group also included representatives from South Baltimore who helped shape our goals focusing on developing pathways to zero waste. We have also worked with members of the South Baltimore community to support funding and benefits for a regional compost facility and were one of 5 Baltimore area universities to sign a letter of support to the Department of Public Works in April of 2022, which contributed to the \$4M in funding the City of Baltimore received from the Environmental Protection Agency last year.

Additionally, members of the university and health system participate actively in many regional committees and organizations committed to advancing sustainability and waste reduction— including the newly-formed Baltimore City Zero Waste Coalition organized by the Department of Public Works.

Like others, we were upset and disappointed to learn about the actions of the Curtis Bay Energy staff that led to the original guilty plea in October and equally alarmed by the most recent lawsuit. This is certainly not what we expect from companies we do business with and has been a catalyst for many internal conversations and coordination, as we look to maximize our medical waste diversion from incineration facilities.

Since learning about the Curtis Bay Energy guilty plea, the Johns Hopkins Health System and University have undertaken a thorough review of all our medical waste contracts, practices, and

data – engaging staff in sustainability, facilities management, health and safety, legal and others. This process has helped us reflect on how medical waste is being managed across our institution, how much of our waste is being diverted from facilities like Curtis Bay Energy, and what the downstream treatment options and impacts are as it pertains to different streams of medical waste.

In total, less than 1% (approximately .00025%) of all medical waste generated by Johns Hopkins Health System at the Johns Hopkins Hospital and Bayview Medical Center in Baltimore are currently sent to Curtis Bay Energy for incineration, and this small fraction can be diverted to other types of treatment facilities, which we are in the process of coordinating. We are proud to say that the vast majority of the health systems medical waste stream is managed through other technologies and vendors.

As a university, we generate limited medical waste, and JHU’s overall medical waste stream has declined by nearly 20% since tracking began in 2008. While portions of the university’s medical waste are sent to Curtis Bay Energy (representing 27% of all institutional medical waste combined), we have assessed that nearly all of this material can be diverted to alternative facilities and technologies and are in active conversations with our teams and vendors to facilitate this process.

Although there are certain components of medical waste that require incineration under legal compliance or technological limitations, this is a relatively small portion of our institutional waste stream. We anticipate that we can divert and treat all but 1% of our medical waste from incineration at Curtis Bay using other technologies, and we are committed to exploring options for this residual amount.

In total, medical waste represents only 9% of the university and health systems total waste stream, and we are committed to reducing this even further. Leading industry organizations, such as Practice Greenhealth, state that health care facilities should strive to keep medical waste under 10% as a realistic figure based on their operations and patient care.¹² Whereas, the World Health Organization cites that 15% of a health care facility’s waste stream is typically considered hazardous.³

As a next step, we are actively working with our facilities teams, vendors, and stakeholders to divert the vast majority of our medical waste to alternative facilities and are confident this process can be conducted quickly in the next 30 to 60 days. We are also engaged in conversations to integrate requirements in future contracts that that will alert us of violations of this type, so we can respond proactively in the future to issues of non-compliance that cause environmental justice and public health concerns.

Lastly, leaders at our institution have been and are continuing to convene a series of meetings with medical waste treatment facilities that Johns Hopkins does business with to ensure we have a thorough understanding of their operational practices and to express the importance of a

¹ <https://practicegreenhealth.org/sites/default/files/2019-03/How%20to%20reduce%20regulated%20medical%20waste.pdf>

² <https://practicegreenhealth.org/tools-and-resources/high-success-through-low-rmw-rates>

³ <https://www.who.int/news-room/fact-sheets/detail/health-care-waste>

commitment to public health, safety, and sustainability for the communities in which they are located.

On behalf of Johns Hopkins Health System and University, I want to express my gratitude for the Council's work to advocate for sustainability, public health, and environmental justice. These are a core part of our institution's priorities, and we look forward to continuing to work with the City and community partners to ensure that our practices embody our commitments to health and well-being for all.

Sincerely,

Bob McLean
Vice President, Facilities
Johns Hopkins University

Sally MacConnell
Senior Vice President, Facilities
Johns Hopkins Medicine