



March 20, 2024

To: The Honorable President and Members of the Baltimore City Council

From: Curtis Bay Energy, LP

Subject: 23-0201R. Informational Hearing – Medical Waste Incinerators

While not requested to appear before the Council for this Informational Hearing, Curtis Bay Energy, LP (CBE) is providing this written testimony to support your discussions of the subject matter.

CBE is the owner of the City's sole special medical waste incinerator located at 3200 Hawkins Point Road. While the facility shares a name and its census tract with the Curtis Bay residential neighborhood, it is located slightly more than 2 miles to the east in all-industrial Hawkins Point. The facility was initially conceived by and then constructed by a consortium of area hospitals, becoming fully operational in 1991. Today, the facility accepts and incinerates special medical waste received directly and indirectly, via other special medical waste companies, from a multitude of medical systems; independent physician, medical, and dental offices; academic and commercial medical research facilities, and governmental agencies. CBE does not accept at the facility, let alone burn, hazardous waste of any kind.

The company and its employees are proud of the unsung service they provide the community. A number of recent equipment and operational challenges and resulting government action has provided a clear reminder that compliance must be at the forefront of everything we do.

The press releases and news headlines have been loud and understandably unflinching. But what has gone unreported is that CBE had effectively self-reported the violations to the Maryland Department of the Environment (MDE) and had already corrected a majority of them. The company has been in regular communications with the Department about these issues and its efforts to identify and then correct the root causes of each.

A series of equipment challenges beginning in the late 2nd quarter of 2023 created a number of cascading issues, in turn leading to emissions exceedances that recurred until replacement equipment was designed, fabricated, delivered, and installed in the fall of 2023. The use of temporary equipment following another's failure unintentionally affected the facility's emissions monitoring system. This in turn led to a number of violations cited by the Department until that monitoring system was effectively rebuilt and proven to be in full compliance with MDE requirements in early December.

The more recent “smoke events” have continued to be a challenge. The company has made changes to its equipment and systems to help prevent their occurrence, but they have proven more difficult to fully eliminate. The company is currently working with outside firms to deploy additional and more substantial technology solutions to ensure they don’t occur at all.

Just since last summer, CBE has spent more than \$1.2 million dollars (and counting) solely on equipment and services focused at correcting the air emissions issues recently cited by the MDE. Significant additional amounts have been invested in additional equipment, services, and personnel to help ensure other requirements continue to be met. CBE has also enhanced training programs for all of the company’s staff, emphasizing fundamental expectations for all regarding safety and compliance obligations. Our team has been working tirelessly to implement each of these improvements.

Curtis Bay Energy remains committed to meeting all requirements of its multiple permits, MDE regulations, and the expectations of our customers and community. We’re confident that we’ll be able to demonstrate this commitment and emerge from this period a stronger operation than ever before.