

February 28, 2023

To: House Environment and Natural Resources Finance and Policy Committee
From: The National Wastes and Recycling Association (NWRA)
Through: Douglas Carnival, McGrann, Shea, Carnival Law Firm

RE: MPCA Budget Request for Solid Waste

A. \$16.9M for Solid Waste Grants: Of the \$16.9M in funding, nearly \$13M would go to MPCA for non-specified projects that would receive solid waste grants.

- 1) What are the specific projects that the MPCA will spend the \$13M on?
- 2) Do these projects impact existing solid waste facilities?
- 3) Will the MPCA conduct the analysis required per Minn. Stat. 115A.551, subd. 6, which requires a thorough analysis of impacts on existing public and private sector business **before** the funds are given to the applicant? Currently, MPCA is requesting funds for solid waste projects that impact private sector investments and clearly, the MPCA is not doing this analysis.
- 4) How can the state ensure a thorough review, competitive grant process and equitable distribution of these General Fund dollars? Doesn't this funding allow the MPCA to pick winners and losers?
- 5) Will the state continue to invest in incinerator-based systems given some of these facilities' financial status, the impact of the Carbon Free by 2040 and their being eliminated as a renewable energy source?

B. \$4.2M for PFAS Treatment/Source Reduction: Our industry has heard that these funds could be used for PFAS leachate treatment, but we are uncertain given the general description of the request.

- 1) Are there specific projects that have requested funding for PFAS leachate treatment?
- 2) There is already widespread, business competition to develop PFAS treatment technologies (See Star Tribune, 2/1/23). Does the state really need to infuse funding into a very competitive business environment that is already searching for solutions?

Conclusion: MPCA's budget request of \$16.9M contains \$13M in unspecified projects. These are significant funding amounts---with no transparency for what city, county or private entity are applying for these funds. We question whether the review of the project and whether an existing facility might be impacted. NWRA thanks you for your time and attention to this important matter. Should you have any questions, please contact Douglas Carnival, at (612)-325-3587.

