



April 8, 2021

Regarding Opposition to RI HB 5923: High-heat Waste Facility Act of 2021

Dear Chairman David Bennett and Members of the House Environment Committee,

The American Chemistry Council (ACC) supports Rhode Island legislators' seeking to protect their communities from development not seen as having positive environmental or economic impacts. However, HB 5923, as currently written, contains several broad definitions that would unintentionally imperil Rhode Island's ability to employ new advanced recycling technologies that recycle and recover more types of post-use plastics.

Advanced recycling technologies enable plastics that currently do not have strong end markets (e.g. films, pouches and tubes) to be converted back to their basic chemical building blocks. These chemical building blocks can go back into new food grade plastics, useful chemicals, and other products like waxes, lubricants and ultra-low sulfur transportation fuels. Technologies such as pyrolysis and gasification heat plastics in an oxygen deprived environment and convert the plastics to liquid feedstocks that can be remanufactured into a versatile mix of new products for remanufacturing. Conversely, the purpose of solid waste incineration facilities is to destroy waste materials via combustion or burning.

Unfortunately, HB 5923 seeks to define technologies that define pyrolysis and gasification and link these technologies to the destruction of waste materials. This contradicts legislation that has been adopted in ten other states, most recently [Virginia](#). Rhode Island's SB 254 seeks to properly define the technologies of advanced recycling and will encourage the development of advanced recycling in Rhode Island, so that non-hazardous and every day plastics can be economically recycled. And diverting residential and commercial plastics from Rhode Island's landfill is estimated to displace the need for 68,000 tons of plastics made from virgin natural sources such as oil and natural gas.

From an environmental standpoint, the emissions for these facilities are low. A [recent report](#) examining the emissions of pyrolysis-based advanced recycling found that these facilities have emissions that are on par or lower than industrial facilities such as food manufacturing and community institutions such as hospitals and universities. These technologies do not produce pollutants like dioxins and are designed to recover valuable, saleable products and are strictly monitored by federal, state, and local air emissions authorities.

In closing, the ACC would like to reiterate the importance of distinguishing the conversion of everyday household plastic items and packaging via manufacturing processes such as pyrolysis and gasification from the destruction and disposal of hazardous, non-plastic waste. The processes which remanufacture plastics back into useful products should remain distinct from other processes that dispose of waste. We recommend that HB 5923 be amended to ensure that Rhode Island's ability to recycle and recover more types of plastics be protected, while simultaneously ensuring state leaders can protect their communities from unwanted development.

Sincerely,

Margaret Gorman
American Chemistry Council