

From: [John Whelan](#)
To: [Sen. Britto, Robert](#); [Sen. Sosnowski, V. Susan](#); [Sen. Bell, Samuel W.](#); [Sen. Famiglietti, Stefano V.](#); [Sen. Gallo, Hanna M.](#); [Sen. Gu, Victoria](#); [Sen. Kallman, Meghan E.](#); [Sen. Mack, Tiara T.](#); [Sen. Morgan, Elaine J.](#); [Sen. Pearson, Ryan W.](#); [Sen. Tikoian, David P.](#); [S Legislation](#); [Sen. Lawson, Valarie J.](#); [Sen. Ciccone III, Frank A.](#); [Sen. de la Cruz, Jessica](#)
Cc: [Rep. Casimiro, Julie A.](#); [Rep. Craven, Robert E.](#); [Sen. Valverde, Bridget G.](#); [Sen. DiMario, Alana](#)
Subject: Support for Amended S3224 -- please bring to the floor
Date: Monday, May 4, 2026 6:34:46 PM

You don't often get email from john.i.whelan@gmail.com. [Learn why this is important](#)

Dear Committee Members and Senate Leadership,

I'm a North Kingstown resident writing to voice my strong support for an amended version of S3224, with the expiration date removed, and to ask you to move it out of committee and to the floor this session. The companion legislation is already moving in the House. The Senate should match it, recommending passage by the full chamber this session, treating the issue with the urgency it merits.

As evidenced by the ongoing civic engagement, including the April 27 North Kingstown Town Council meeting, the citizens of North Kingstown do not want a sewage sludge pyrolysis plant in their community. I would not wish an unproven technology with a dubious air permit on any community in our state, for that matter.

Several speakers at the April 27th meeting highlighted the problems with DEM's permit and the alarming emissions from the project. My background is in infrastructure finance, and I was one of those speakers. As you know, DEM's permit authorizes 83 pounds of mercury emissions per year. Mercury is a neurotoxin — CDC and EPA are clear that there is no safe level of exposure for children, to say nothing of benzene. It defies common sense to site a project with such an emissions profile next to schools, neighborhoods, atop an aquifer, and near Narragansett Bay. I find it similarly shocking that DEM did not press for more stringent controls, such as requiring activated carbon injection to mitigate mercury emissions, and believe DEM failed to act in the public interest by taking QSS Biosolids' math at face value when determining that the technology was too expensive to implement. Per DEM's air permit, the capital cost for activated carbon technology is \$4.7 million against a \$150 million project budget — 3%. I have never seen an infrastructure project that did not have a comparable or greater overage. The annualized cost of the activated carbon technology (capital expenditure plus operating expenses) is represented at \$12.50 per ton of sludge, but even this is misleadingly high, as the costs are annualized over a 10 year term, when EPA amortizes such capital costs over a 20 year term and the useful life of such a plant is closer to 30 years.

Mercury is one of 25 toxic air contaminants in this permit that exceed the state's own modeling thresholds — including benzene, hydrogen cyanide, hydrogen fluoride, and dioxins. The permit was issued as a “minor source” based on an EPA determination that pyrolysis is not technically incineration under existing federal definitions. If true, that is a regulatory gap, not a safety finding. It may be true that the project adhered to the rules and the regulations as currently written, but being technically correct should not allow a project to emit the sort of toxins at all, and certainly not at the volumes we are discussing. It is quite simple: if the rules and regulations as applied would result in communities being exposed to unacceptable health and environmental risks, those rules and regulations should be changed.

Removing the expiration date from S3224 matters. The QDC lease is suspended, not

terminated. The air permit is issued and technically valid. Without permanent legislation, this project — or one like it under a different LLC — can restart as soon as public attention fades. North Kingstown residents need to know this is settled, and the QDC-North Kingstown relationship needs that certainty to recover.

Please move this bill to the floor.

Thank you,
John Whelan
105 Scrabbletown Road, North Kingstown, RI 02852