



JOHN A. OLSZEWSKI, JR.
County Executive

D'ANDREA L. WALKER, *Acting Director*
Department of Public Works

July 21, 2021

Mr. George S. "Tad" Aburn, Jr., Director
Air & Radiation Management Administration (ARMA)
Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
Via email to Randy Mosier and Eddie Durant of MDE

RE: 2016 Emissions Guidelines and New Source Performance Standards Updates

Dear Mr. Aburn:

Thank you for the opportunity to comment on the Maryland Department of the Environment's proposed updates to the 2016 Emissions Guidelines and New Source Performance Standards (EG/NSPS). Baltimore County is investing in a solar power purchase agreement (PPA) at the closed Hernwood Landfill, and we oppose any regulatory change which could jeopardize the County's investment in renewable energy at this site.

Baltimore County entered into a Power Purchase Agreement (PPA) with Sunpower LLC to generate 21 megawatts of solar energy at the closed Hernwood Landfill. The County entered into this agreement under the existing regulatory framework. As we understand MDE's proposed change to the regulatory framework, Baltimore County would be forced to wind down our renewable energy project and to install a new landfill gas collection system at the site. Simply put, Baltimore County objects to MDE changing the rules under which we entered into the agreement with Sunpower LLC to generate renewable energy at the Hernwood Landfill.

Baltimore County shares MDE's concerns about methane gas emissions and climate change, and we therefore urge MDE to follow the 2016 federal regulations in lieu of the proposed regulations.

Again, thank you for the opportunity to comment. If you have questions, please contact Michael Beichler at mbeichler@baltimorecountymd.gov.

Sincerely,

Lauren Buckler, PE
Deputy Director
Department of Public Works & Transportation

Cc: Johnny Olszewski, Jr., County Executive
Patrick Murray, Chief of Staff
D'Andrea Walker, Director DPWT
Michael Beichler, Bureau Chief Solid Waste

Stacy Rodgers, Chief Administrative Officer
Charles Connor, III, Esq, Director of Government Affairs
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