



**36TH LEGISLATURE OF THE VIRGIN ISLANDS
COMMITTEE ON GOVERNMENT OPERATIONS, VETERANS AFFAIRS, AND
CONSUMER PROTECTION**

The Honorable Senator Avery L. Lewis
Chair of Committee

Testimony Presented By
The Honorable Justa Encarnacion, RN, BSN, MBA/HCM
Commissioner of Health

on

Bill No. 36-0232: An act amending Act No. 8018 to authorize the disposal of green waste using controlled incineration technologies, including air curtain incinerators, and for other purposes.

1 Good day, Honorable Senator Avery L. Lewis, Chairperson of the Committee on Government
2 Operations, Veterans Affairs and Consumer Protection; Honorable Senator Novelle E. Francis,
3 Vice Chair; members of the Committee, other Senators present, and to the viewing audience.

4 I am Reuben Molloy, Assistant Commissioner of the VI Department of Health testifying on
5 behalf of the Honorable Commissioner Justa Encarnacion. I am joined by Chief Legal Counsel
6 Mackiesh Taylor-Jones and Director of Environmental Health, Wanson Harris.

7 We are here to provide testimony on Bill No. 36-0232, which proposes the use of controlled
8 incineration technologies, including air curtain incinerators, for green waste disposal.

9 From a public health perspective, air curtain systems present conditional benefits and risks.
10 When properly operated — particularly for vegetative debris following disasters — they can
11 reduce waste accumulation, limit disease vectors, decrease fire risk, and improve sanitation.
12 However, these benefits must be balanced with potential air quality impacts, including
13 particulate matter exposure to nearby communities.

14 It is important to note that air curtain incineration is one of several potential waste management
15 approaches. Other methods may achieve similar public health benefits with less risk to air
16 quality, depending on how they are implemented. As such, the Department does not take a
17 position in favor of a single method but instead emphasizes the importance of selecting solutions
18 that minimize overall public health risk.

19 At the same time, maintaining the current system of grinding and stockpiling waste presents
20 clear and increasing public health concerns:

- 21 • Worker exposure to carcinogenic wood dust over prolonged periods
- 22 • Elevated community air pollution from fine particulate matter (PM2.5)
- 23 • Fire risk associated with large, unstable debris piles
- 24 • Increased vector activity, contributing to the spread of disease

25 Regardless of the method selected, these risks underscore the urgent need for timely and
26 effective waste reduction strategies.

1 The primary pollutant of concern across disposal methods is fine particulate matter (PM2.5),
2 which is associated with respiratory and cardiovascular health effects. Additional pollutants may
3 also be generated depending on the process and materials involved. Local weather patterns,
4 including low wind conditions, can further influence exposure levels for nearby communities.

5 For these reasons, the Department of Health strongly recommends that any selected approach
6 include:

- 7 • Strict operational controls and monitoring
- 8 • Clear limitations to vegetative waste only
- 9 • Worker protection measures
- 10 • Air quality monitoring and community safeguards
- 11 • Implementation of a process for immediately notifying the Department of Health's
12 Division of Environmental Health upon changes in air quality that can adversely affect
13 surrounding communities.

14 In closing, the Department of Health's role is to ensure that public health risks are clearly
15 identified, mitigated, and monitored. We remain committed to working with the Legislature and
16 our partners to support a solution that is effective, sustainable, and protective of both workers
17 and the broader community.

18 The Department of Health thanks Senator Clifford A. Joseph, Sr. for introducing this measure,
19 and Senator Lewis, Senator Kenneth Gittens, and Senator Franklin Johnson for their sponsorship.
20 We stand ready to answer any questions.