

**TESTIMONY FOR THE COMMITTEE ON GOVERNMENT  
OPERATIONS, VETERANS AFFAIRS, AND CONSUMER PROTECTION**

**VIRGIN ISLANDS WASTE MANAGEMENT AUTHORITY**

**36TH LEGISLATURE OF THE VIRGIN ISLANDS**

**MONDAY, MARCH 23, 2026**

**9:00 A.M.**

**DARYL GRIFFITH, CHIEF FINANCIAL OFFICER**

**VIRGIN ISLANDS WASTE MANAGEMENT AUTHORITY**

Good morning, Honorable Senator Avery L. Lewis, Chairman of the Committee on Government Operations, Veterans Affairs, and Consumer Protection; other distinguished members of the 36th Legislature; and members of the viewing and listening public.

My name is Daryl Griffith, Chief Financial Officer of the Virgin Islands Waste Management Authority (VIWMA). I appear before you today on behalf of VIWMA's Executive Director, Mr. Hannibal "Mike" Ware. Joining me are the Authority's Chief Engineer, Mr. Alex Bruney, and the Chief of Solid Waste, Ms. Shena Esannason.

We are here in support of Bill No. 36-0232, which seeks to amend Act No. 8018 to authorize VIWMA to manage green waste using controlled combustion technologies, specifically air curtain incinerators, also known as air curtain burners.

### **The Problem: Green Waste Accumulation and Landfill Fire Risk**

VIWMA continues to face persistent and growing challenges related to the accumulation of vegetative, or "green," waste, particularly following storms, hurricanes, and large-scale land-clearing activities.

When green waste accumulates at landfill sites, it significantly increases the risk of landfill fires, posing serious threats to:

- Public health
- Air quality
- Worker safety
- Critical infrastructure
- Nearby communities

Between calendar years 2024 and 2025, VIWMA recorded fifteen (15) landfill fire incidents Territory-wide:

- **2024:** Six (6) incidents

- Five (5) on St. Croix
- One (1) on St. Thomas
- **2025:** Nine (9) incidents
  - Six (6) on St. Croix
  - Three (3) on St. Thomas

In 2026, the Authority has already responded to a fire at the Anguilla Landfill. This trend reflects an alarming increase in both the frequency and operational impact of landfill fires. Each response requires substantial manpower, coordination with Fire Services, emergency equipment deployment, and often repeated landfill closure causing disrupting service to residents, straining public safety resources, and significantly increasing operational costs.

### **Air Curtain Burners (ACBs)**

Air curtain burners are controlled, regulated combustion systems widely used across the United States to process vegetative debris, clean wood, and disaster-related organic materials, and they are neither open burning nor mass-burn municipal waste incinerators. In these systems, combustion occurs within a contained firebox, while a high-velocity air curtain traps smoke, sparks, and embers over the combustion zone. This design significantly reduces visible emissions and ash dispersion, and the higher, more efficient combustion temperatures lower the risk of uncontrolled fires.

Authorizing the use of air curtain burners during storm and hurricane recovery, in addition to normal operations, would enable VIWMA to reduce landfill fire risk at the source. It would also improve operational efficiency during peak debris periods, lower emergency response and long-term cleanup costs, and enhance overall regulatory compliance and environmental controls. The results from using the ACB is a product called biochar which offers clear benefits for our farmers and residents by improving poor, rocky soils, conserving scarce water, and

reducing farming costs. Its porous structure increases soil fertility and microbial activity, helps soils retain moisture during dry periods, and holds nutrients so crops need less fertilizer and suffer less runoff into coastal waters. When produced locally from vegetative or hurricane debris, biochar also reduces landfill pressure, supports environmental protection, and turns storm waste into a long-lasting resource that strengthens food security and climate resilience across the Territory.

### **EPA and Other Federal Agencies ruled ACI safe**

Air curtain burner incinerators are a safe, federally compliant method for managing vegetative and hurricane debris when used for approved materials and operated under Clean Air Act regulations. They differ from open burning because they use controlled airflow for secondary combustion and are subject to strict emission limits, monitoring, and permitted operating requirements. Federal agencies recognize these units as reducing fire risk and emissions, often performing cleaner than hauling, grinding, or uncontrolled burning, and EPA has identified them as critical tools for rapid disaster recovery. Given limited landfill capacity and urgent post-hurricane cleanup needs, air curtain burners offer an environmentally responsible solution that protects public health while enabling timely debris removal.

### **Consent Decree**

The Landfills Partial Consent Decree aims to bring landfill operations into compliance with federal environmental and fire prevention standards by reducing combustible materials and preventing uncontrolled fires and air emissions. Unmanaged green waste is a documented fire hazard that increases the risk of subsurface and surface fires, emissions violations, and continued federal oversight. While the decree prohibits uncontrolled fires and open burning, it

allows controlled combustion methods, and properly permitted air curtain burners are consistent with the decree because they reduce fuel loads, improve air quality, and help prevent landfill fires.

### **Community Engagement & Accountability**

On March 10, 2026, VIWMA hosted a Town Hall at the Bovoni Landfill to engage residents and stakeholders on the proposed ACB use. We appreciate the constructive input and have incorporated it into our planning.

#### **What we heard:**

- General support for the equipment; no significant opposition expressed
- Requests for clearer communication about:
  - Location of the burner
  - Hours and frequency of operation
- Additional requests for:
  - Clear maintenance standards
  - Defined accountability and oversight
  - A public demonstration once operational
  - A public fact sheet explaining the technology and safeguards

#### **What we're doing:**

- Integrating these requirements into our implementation procedures and public outreach

- Coordinating with the Virgin Islands Water and Power Authority to extend a water line and install an additional fire hydrant nearer to the green waste processing area to strengthen on-site fire suppression capacity
- Committing to regular communication with the Bovoni stakeholders and the wider community

### **Horizontal Grinders for Mulching & Beneficial Reuse**

In addition to ACBs, VIWMA will deploy two horizontal grinders (acquired through an EPA grant) to support mulching operations on St. Croix and St. Thomas. Collected green waste will be processed into mulch for beneficial end uses such as agricultural soil enhancement and landscaping. This:

- Further reduces incoming landfill volume
- Creates local, beneficial products
- Expands resource recovery and diversion options Territory-wide

### **Access for Residents & Businesses**

Residents and small haulers will have designated access points and clear guidance for green waste drop-off, reducing illegal dumping and supporting neighborhood cleanups and storm recovery efforts. This is a direct and tangible benefit for communities, especially those near Bovoni.

The Grinder and ACB technology may also be combined, shredding and controlled burning allow us to:

- Avoid burying large volumes of organics in the landfill
- Reduce methane generation from decomposing green waste

- Limit uncontrolled fires and illegal burning
- Operate under regulated, monitored conditions with defined safeguards

### **Conclusion**

Honorable Senators, this request is about preventing fires before they start, protecting public health and air quality, and modernizing how the Virgin Islands responsibly manages green waste. Authorizing the use of an air curtain burner, combined with our use of a low-speed shredder and horizontal grinders for mulching, represents a comprehensive, cost-effective, and environmentally responsible strategy that reduces landfill fires and emergency closures. It improves air quality, particularly for residents in and around the Bovoni area. It accelerates storm recovery and debris clearance, and expands diversion and beneficial reuse. Most critically, this integrated approach significantly increases desperately needed landfill capacity at a time when space is rapidly diminishing, a need that mulching and composting alone cannot meet. This is a proactive investment in safety, resilience, and responsible waste management for the people of the Virgin Islands. The air curtain burner is not a luxury—it is a necessary, preventive tool that addresses a documented and growing risk, incorporates community feedback, and supports the long-term operational sustainability of VIWMA.

We respectfully urge your consideration and support of Bill No. 36-0232, so VIWMA may continue to protect the people, environment, and infrastructure of the Virgin Islands. Thank you for the opportunity to present this testimony. The VIWMA team stands ready to answer any questions you may have.