

# “Waste-to-Energy” Garbage Incinerators: An Environmental Disaster for Sullivan County

Note: Footnotes for materials are referenced below, not all links are activated.

Citing concerns about the pending loss of the Seneca Meadows municipal solid waste landfill (Seneca Falls, NY), Sullivan County Legislators seem to be going with a so-called “waste-to-energy” company, ReWorld (formerly Covanta) to solve Sullivan County’s waste disposal problems, without looking into other, less destructive alternatives like zero waste disposal options that incorporate recycling and pre-burn waste reduction to reduce the pollution and destructive side effects that incineration can inflict on people and the environment. Be advised, the so-called “waste-to-energy” title is just an incineration by another name. **(1)** For years, the incineration industry has been falsely ‘greenwashing’ their operations as non-toxic, taking false advantage of tax subsidies and credits that the “green” status confers, only to skip out, leaving their customers to foot the bill from staggering construction debt and the inevitable costs associated with the environmental pollution and illness that remain long after the incinerator has ceased operating. Here are some facts to review before you get involved with W to E incinerator waste disposal programs.

## **1. “Waste-to-Energy” Incinerators are ‘super polluters’.**

Waste incinerators run giant combustion chambers to burn large amounts of trash, making them the most emission-intensive way of generating electricity, while leaving behind ‘forever’ POPsS (persistent organic pollutants) in the process. Per unit of energy, incinerators can emit more air pollutants than coal plants, up to 2.5 times more greenhouse gases, 4 times more cadmium and hydrogen chloride, 5 times more carbon monoxide, 6 times more smog-forming nitrogen oxides, 14 times more mercury, 18 times more lead **(1)**, and sometimes more. **(2)**

## **2. ReWorld W to E Company is a top polluter and violator of permit requirements.**

The company is among the worst polluters in New Jersey. All four of ReWorld’s remaining “WTE” incinerators are in the top five polluters of all stationary sources in the state. In the last 20 years, Covanta Essex and Covanta Camden have had over 800 and 400 permit violations, respectively, including emissions more than 8 times the permitted limit, and multiple years when a single incinerator had over 100 violations. **(3)**

## **3. W to E Incinerators Harm Human Health and the Environment**

Incinerators are major emitters of cancer-causing dioxins and furans, as well as the neurotoxin mercury. Modern incinerators in the EU are a major source of ultra-fine particulate emissions. Incinerators are advancing climate change, creating more CO<sub>2</sub> per megawatt-hour than natural gas-, oil-, or coal-fired power plants. **(4)** The persistent organic pollutants (POPsS) they emit don’t break down but are transported by wind and rain all over the planet, building up in wildlife and people as far away as the Arctic. **(5)**

This pollution can increase the risk of miscarriages, preterm birth, and non-Hodgkin’s lymphoma in adults, and wheezing/fatigue in children who live or go to school nearby. **(6)**

## **4. W to E Incinerators Do Not Solve the Waste Problem**

So-called “WTE” facilities do not get rid of waste, they merely transform it into different and more toxic forms of waste. These emissions create concentrated toxins found in filters, fly, bottom, and other types of ash; and wastewater sludge, all of which must be disposed of usually in a landfill, but now in a landfill certified to handle hazardous waste (more expensive disposal) and the transport of hazardous waste is much more dangerous. **(3), (4)**

## **5. W to E Incinerators - Expensive to Build and to Run**

Studies show the waste incineration industry has the highest ratio of negative economic impacts from air pollution compared to the financial value added by the industry. **(7)** In large incinerator facilities, more than half the total construction cost and recurring operating cost come from pollution control structures and systems. The latest incinerator facilities in developed countries can cost upwards of \$150 million. Operations and maintenance costs are 4 times the cost of nuclear plants and 10 times the cost of coal plants. **(8)** According to Rhode Island's law banning incineration in the state, (State Senate Act 92-S 2502), "Incineration of solid waste is the costliest method of waste disposal with known and unknown escalating costs, which would place substantial and unreasonable burdens on both state and municipal budgets to the point of jeopardizing the public's interest." (Emphasis added.) Alternatives to W to E, see point 8.

## **6. W to E Incinerators Use More Energy Than They Produce**

Some incinerators use the heat from incinerated waste to produce steam to generate electricity, in a way similar to coal plants. But because this waste doesn't contain much energy, and wet materials don't burn well, incinerators can only produce small amounts of energy by burning large amounts of waste, waste that contains what could be reuseable, recyclable materials. Older incinerators with an efficiency rating of only 19-27%; are actually somewhat more efficient than new W to E incineration facilities. **(8)**

## **7. Municipalities Responsible For Waste and/or Financial Shortfalls**

When parties enter into contract with a "WTE" facility, they must commit to a minimum amount of waste to burn to produce a stated dollar amount of energy (electricity) to sell.

If there is not enough profit to be made from the amount of waste burned, then the contracted party must make up the monthly shortfall in lost profit by paying this difference to the "WTE" company. This is called a "put or pay" contract. **(8)(9)**

## **8. if no incinerator (or Waste to Energy incinerator) then WHAT TO DO?**

Besides instituting as many recycling and other 'zero waste' activities as possible in each community and in the county, the TrashBOT made by TrashCON (<https://trashcon.in/>) which has a 2 to 3 year payback would vastly decrease the total volume of trash to be dealt with. The WTE plant would take about 4 years to set up and as covered above be much more expensive and polluting. 'Zero waste' also takes about 1 to 2 years to set up.

For all the reasons outlined above, we the undersigned residents, workers, visitors and folks with family, business, economic and cultural ties to the area (Sullivan County, Ulster County, etc.) oppose the Legislators' plan to pursue a "WTE" facility in our area. We ask our Legislators to use a Zero Waste plan to responsibly deal with and resolve Sullivan County's municipal waste issues.

---

<sup>1</sup> Comments of N.Y. State Dep't of Env't Conservation, In the Matter of the Application of Covanta Energy Corporation for Inclusion of Energy from Waste Facilities as an Eligible Technology in the Main Tier of the Renewable Portfolio Standard Program at 3-7, App. A fig. 3, 6 ("NYSDEC Comments"), Case No. 03- E- 0188, (Aug. 19, 2011), <https://>

[waterfrontonline.files.wordpress.com/2017/12/decommentsoncovantaaugust2011.pdf](https://waterfrontonline.files.wordpress.com/2017/12/decommentsoncovantaaugust2011.pdf); Comments of Attorney General Eric T. Schneiderman, In the Matter of the Application of Covanta Energy Corporation

for Modification of the List of Eligible Resources Included in the New York Main Tier of New York's Renewable Portfolio Standard Program to Include Energy From Waste (ETW) Technology at 10-16, Case No. 03-E-0188SP29 (Aug. 19, 2011), <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRef1d=%7BC16488AD-4FB5-477B-95A9-6C7797FC7EFD%7D>; Environmental Integrity Project, Waste-To-Energy: Dirtying Maryland's Air by Seeking a Quick Fix on Renewable Energy? at 3-9 (Oct. 2011), <https://web.archive.org/web/20131217055632/http://www.environmentalintegrity.org/documents/FINALWTEINCINERATORREPORT-101111.pdf>; Neil Tangri, Waste Incinerators Undermine Clean Energy Goals, Global Alliance for Incinerator Alternatives, 5 (2021), <https://doi.org/10.31223/XSVKXS>. 2 Ana Isabel Baptista & Adrienn

<sup>2</sup> Ana Isabel Baptista & Adrienne Perovich, U.S. Municipal Solid Waste Incinerators: An Industry in Decline at 37-38, *Ishman Env't and Design Ctr.* (May 2019), <https://static1.squarespace.com/static/5d14dab43967cc000179f3d2/U5d5c4bea0d59ad00012d220e/1566329840732/CR+GaiaReportFinal+05.21.pdf>.

<sup>3</sup> See Letter from Ironbound Community Corporation-et al. to New Jersey Dep't of Env'tl. Protection et al. (Apr. 30, 2020), Attachment 3 (updated Sept. 28, 2020), [https://earthjustice.org/sites/default/files/files/2020-04-30\\_icc\\_njeja\\_letter\\_bpu\\_dep.pdf](https://earthjustice.org/sites/default/files/files/2020-04-30_icc_njeja_letter_bpu_dep.pdf).

<sup>4</sup> <https://www.no-bum.org/wp-content/uploads/2021/03/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf>

<sup>5</sup> Jean-Francois Viel et al., Soft-tissue Sarcoma and Non-Hodgkin's Lymphoma Clusters Around a Municipal Solid Waste Incinerator with High Dioxin Emission Levels, 152 *Am. J. Epidemiology* 13-19 (2000), <https://pubmed.ncbi.nlm.nih.gov/10901325/>; Silvia Candela et al., Air Pollution from Incinerators and Reproductive Outcomes: A Multisite Study, 24 *Epidemiology* 863-70 (2013), <https://pubmed.ncbi.nlm.nih.gov/24076993/>; Silvia Candela et al., Exposure to Emissions from Municipal Solid Waste Incinerators and Miscarriages: A Multisite Study of the MONITER Project, 78 *Environ. Int.* 51-60 (2015), <https://pubmed.ncbi.nlm.nih.gov/25765761/>; Yoshihiro Miyake et al., Relationship Between

Distance of Schools from the Nearest Municipal Waste Incineration Plant and Child Health in Japan 20 *European J. Epidemiology* 1023-29 (2005), <https://pubmed.ncbi.nlm.nih.gov/16331434/>. Baptista & Perovich supra note 2 at 37. 8 See Letter from Ironbound

<sup>5</sup> <https://www.nrc.gov/biodiversity/energy/bumedia/wy-waste-incineration-harmful-to-text-these-20chemicals-and-20pollutants-enter-and-other-to-adverse-health-impacts>.

Muller, Nicholas, Robert Mendelsohn, and William Nordhaus. 2011. "Environmental Accounting for Pollution in the United States Economy. *American Economic Review*, 101(5): 1649-75.

<https://www.no-bum.org/wp-content/uploads/2021/03/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf>

[https://www.no-bum.org/wp-content/uploads/2021/03/GAIA-Facts-about-WTE-incinerators-](https://www.no-bum.org/wp-content/uploads/2021/03/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf)

[Jan2018-1.pdf](https://www.no-bum.org/wp-content/uploads/2021/03/GAIA-Facts-about-WTE-incinerators-Jan2018-1.pdf)

