



Testimony by Jane Harris, Executive Director, Oregon Center for Environmental Health (OCEH) to Oregon DEQ, 12/13/06

Testimony Air Permit Renewal for Covanta Marion, Inc., Waste-to-Energy Facility by Oregon Center for Environmental Health (OCEH)

DEQ Air Quality
Attention: Patty Hamman, Permit Coordinator
750 Front St. NE, #120
Salem, OR 97301-1039

Dear Ms. Hamman:

These comments on the permit renewal for the Covanta incinerator in Brooks, Oregon are being submitted on behalf of the Oregon Center for Environmental Health (OCEH). OCEH is a non-profit environmental/public health organization founded in 1996 to promote alternatives to toxins that are having detrimental impacts on public health and the general environment. Current and proposed emissions from the incinerator certainly fall into this category and we share the local community's legitimate concerns for their safety and the safety of the local food supply.

Our organization has had a specific interest and focus on incineration issues for several reasons. First, municipal and medical waste incineration is one of the largest sources of persistent toxic pollutants like mercury and dioxin nationwide. Secondly, there are readily available and viable alternatives to incineration which are considerably less polluting and often less expensive.

In Oregon, incineration of our waste has gone the way of the dinosaurs. The last medical waste incinerator at Portland's St. Vincent hospital was voluntarily shut down in 1994 after three years of failure of its "state of the art" technology to pass state mandated emissions testing and significant public outcry. The irony of a health care facility running a waste management operation that pumped out toxic air emissions and produced toxic fly ash was not lost on the public. Subsequent testing of the soil around the hospital found dioxins at elevated levels, a scenario unacceptable to the hospital and the community. The same would, no doubt, be true for the pasture-land and food processing facilities adjacent to the Covanta incinerator.

Our position on this issue is not to argue about emission limits in the new permit, but to advocate for a phase-out of the facility all together. Given the looming crisis in terms of a contaminated food supply, global climate changes on a catastrophic scale, and asthma and lung cancer rates that are rising at an alarming rate, we simply must find alternatives to industrial processes that result in harm to our citizenry and the environment.

We further believe that we can build a case with the public for land filling as an alternative to incineration and that with better sorting and recycling of hazardous materials we can envision a waste management system that places far less risk with the community.

Incinerators create and disburse some of the most toxic substances on the planet.

Today's garbage is a complex mixture of paper, plastic, metals and biodegradable materials. While most garbage is generally inert and safe at the time we dispose of it, much of it contains chemicals that produce extremely toxic by-products when heated. Chlorinated

plastics are a good example. The EPA reports that the burning of chlorinated plastics is the chief way in which dioxins are created and released into the environment. The agency further reports that every single American is already living with body burden levels of dioxins and further exposure puts them at risk for a host of diseases including endocrine system failures and cancer.

Heavy metals such as lead, cadmium and mercury are also found in large amounts in our garbage. All kinds of plastics incorporate metals such as lead, cadmium and mercury as additives, to give the plastic a certain color, strength or flexibility. The growing problem of discarded electronics also contributes significantly to the amount of toxic metals in our waste stream. Burning of these metals helps disburse toxic metals world-wide and puts them in a form that can also be inhaled. The resulting fly ash is extremely hazardous and requires care and expense in the proper handling of the waste.

Incineration results in asthma, acid rain, poor air quality, and global warming.

In addition to the persistent and bio-accumulative effects of toxins produced by incinerators, communities must also deal with asthma producing particulate matter, 14 tons a year from Covanta, acid rain precursors, 220 tons a year of sulphur dioxide, and green house gases, in the case of Covanta, 99 tons a year of carbon monoxide. Thirty years ago we did not understand the impact of incinerators on our health and well-being and we saw them as a nearly perfect system that got rid of our waste and generated energy at the same time. Now we know better and continuing to rely on this out-dated, hard to control technology is unreasonable and puts too high a burden on the public.

Communities with incinerators have experienced negative public health impacts

While a health analysis of the incinerator's impact on Willamette Valley residents has not been done, a review of the medical literature on other communities with incinerators reveal that negative health impacts do take place. Residents living 0 to 1 km from municipal waste incinerators in England were found to have greater rates of stomach, colon, liver and lung cancer than those living further away (Elliott, 1996). Another study in England showed greater rates of stillbirths, spina bifida and heart defects in babies born to mothers that lived near incinerators (Dummer, 2003). In Columbus, Ohio, children who had lived near an incinerator for at least two years were found to have significantly higher cadmium levels in their hair. Higher cadmium levels in these children were also associated with increased learning and behavioral problems (Stewart-Pinkham, 1989). Several studies in Japan and Korea have shown that incinerator workers and nearby residents had much higher levels of dioxin in their blood than citizens who worked or lived elsewhere (Takata, 2003; Leem, 2003).

Landfills are not perfect, but they have many advantages over incinerators.

Landfills, while not a perfect solution for proper waste management, have gotten much better at protecting public health and the environment. Problems such as leaching of chemicals and waste into groundwater, soil or surface water have been solved with new regulations - all municipal waste landfills now are designed with liners to prevent leaching problems. They are also carefully located at a necessary distance away from communities and vulnerable natural features such as rivers and streams. Newer landfills are also built so that resulting methane gas is collected and sold on the open market.

Land filling also has the advantage of sequestering waste and its inherent toxic pollutants in one secure place, rather than putting that same pollution into the air we breathe. Landfills

do not produce enough heat to create dioxins and furans. Land filling also provides a greater opportunity to source separate and recycle reusable and toxic waste. Ultimately, land fill waste disposal is more flexible, less costly in terms of regulation and the ability to return profit from recycling and methane production and a much safer alternative from an environmental and public health perspective.

The Oregon Center for Environmental Health is committed to working with the public to promote this alternative to incineration and hopes DEQ will respond to public concerns expressed during this permitting process.

We appreciate the opportunity to submit comments on this matter.

Sincerely,

Jane Harris
Executive Director
Oregon Center for Environmental Health

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