

to: lee.sawyer@ct.gov

November 25, 2013

To Whom:

I apologize that I wasn't able to testify at the DEEP Public Hearing on **Incineration**, November 19 at the Resource Recovery Task Force public comment and listening session.

As a **member of Hartford's Advisory Commission on the Environment (ACOTE)**, and a person who helped lead the fight in NYC against a proposed mass-burn incinerator at the Brooklyn Navy Yard in the early 1990s, I do, of course, have concerns about incineration

FACTS

- Connecticut burns more trash per person than any other state in the country. Meanwhile, CT is far from our goal of doubling recycling in the next decade. Our over-reliance on incinerators has kept our recycling rate stagnant for the past decade.
- Incineration has been unfairly and unreasonably subsidized in Connecticut for too many years: CT helped build incinerators by taking out loans at low government rates and secured those loans with generous long term contracts. Now that those contracts are running out, the incineration industry is trying to make CT ratepayers pay more for the electricity the incinerators generate.
- Burning trash is not clean energy like wind and solar and should not be treated as such. It's not as clean, and **giving it clean energy incentives significantly harms efforts to create more clean energy for Connecticut.**
- Incineration releases toxic chemicals like mercury and dioxin and many others into the air we breathe and produces more than half a million tons of toxic incinerator ash every year.
- Incineration is a huge threat to our public health, and especially in cities already stressed by toxins. A public health threat to everyone in Connecticut, incineration is especially insidious in communities like Hartford that host incinerators and ash landfills (collecting trash from more than 50 other towns). Facing these stronger health threats and perhaps environmental injustice and racism, Hartford should be represented at the table when decisions are being made.

ACTS I urge you to:

- Work to increase recycling, not maintain the status quo. We should be doing everything we can to **increase recycling and reduce incineration**, not paying for burning trash and creating pollution.
- Do not treat incineration as if it's clean energy! Giving it clean energy incentives harm efforts to create more clean energy -- like solar and wind -- for Connecticut
- We in Hartford do not want to pay for pollution subsidies. We demand to be at the table, on the task force, when these considerations are being discussed and decisions made.

I look forward to hearing back from you on this most important issue. Thank you.

Sincerely,

JoAnne Bauer, Ph.D.
ACOTE Commissioner

25 North Beacon St
Hartford, CT 06105
860-233-7852

DEEP Public Hearing November 19, 2013

**To: Deputy Commissioner Macky McCleary and all
Members of the Resource Recovery Task Force**

I am a member of the Connecticut Coalition for Environmental Justice (CCEJ) and the Asylum Hill NRZ here in Hartford. Most of all, my comments are those of a citizen of the City of Hartford and the State of Connecticut.

I support all efforts to reduce the volume of waste going into the incinerator and to increase recycling.

Energy derived from solid waste is inefficient and expensive to produce, and environmentally detrimental. Further, any income earned from it has to be viewed as temporary and unreliable. Thus, a business model to effectively support a Resource Recovery Facility (RRF) - mission statement for CRRA attached - requires goals to decrease incineration and to put more recycling and reusing businesses on the map. While the RRF continually works to put the incineration process out of business, they create new jobs for themselves and others in previously unimaginable ways. If this is done, there will be plenty of work - and jobs.

A New Roadmap to Sustainability for CRRA

What is needed in designing the new business model for CRRA is a **complete paradigm shift** in terms of *how* a successful RRF is to go about achieving the mission statement as approved by its Board of Directors. The position that CRRA finds itself in at this point is largely due to failure to do what the mission statement indicates as critical to its success – despite all good intentions. Emphasis on the sale of energy derived from waste and bi-lateral contracts is not only counterproductive to the mission, it has proven to be financially disastrous.

How would you move to a new paradigm? First, imagine if in 2010, when Single Stream Recycling was rolled out in Connecticut cities and towns, that the compensation for CRRA management and employees were tied to annual reductions in solid waste going in to the incinerator and increases in recycling. The people who work there at every level have ideas, know where the gaps are and know how improvements can be made. Yet no one is going to step up or speak up if their ideas are ignored or stifled, and if they are rewarded for perpetuating the status quo.

So, imagine again, that in 2010, as part of the goal to minimize incineration and increase recycling, that someone at CRRA had the foresight, courage, and tenacity to implement procedures and controls to comply with the statute that requires RRF's to monitor and report haulers who dump loads of waste designated for the incinerator with significant amounts of recyclables (Sec. 22a-220c (b)). This, combined with a 'Recycling Awareness' campaign would not only have helped fulfill CRRA's regulatory and social obligations, it quite possibly could have resulted in this RRF being a driving force for change in Connecticut's solid waste and recycling markets – perhaps a national model.

Part of Overall Diversion Strategy

Keeping RRF's accountable and structuring the business model around the mission and the steps identified as critical to their success (as on the attached) as part of the overall strategy to increase recycling and reduce waste is essential.

Closing Comments

The considerable research validated by the EPA and others that incinerators create increased risk to the health of the population and environment, combined with the fact that it is not a good use of capital, all point to the need to actively reduce the amount of solid waste that goes to the incinerator, and landfills, and increase recycling. I suggest to you that in light of the current situation, that **it is not too late for a paradigm shift.**

Sincerely

Claudette L. Worth

Claudette L. Worth



To: Resources Recovery Task Force
From: Betsy Gara
Executive Director, COST
Date: November 19, 2013
Re: **Public Comment Session - Resource Recovery Facilities**

Thank you for the opportunity to comment on issues relating to resource recovery facilities operating in Connecticut.

The Connecticut Council of Small Towns (COST) supports efforts to ensure that there are sufficient revenues to support the continuation of waste disposal operations in Connecticut.

The present abundant supply of low cost natural gas has significantly reduced electric power generation costs in New England. An unforeseen consequence has been a radical decline in the market value of power being generated by the Hartford facility. Without intervention, this successful thirty-year-old model for handling municipal solid waste will no longer be sustainable. Plant operating costs will become prohibitive unless CRRA is permitted to charge more for its energy output.

Fifty-one CRRA member towns, which have recently renewed Municipal Service Agreements with CRRA, will be subjected to dramatic increases in tipping fees to keep the plant operating if this is not addressed.

While CRRA's Hartford plant was the first to experience this market generated constriction in the value of its product, other plants are soon to feel similar pain as their old contracts expire and they go back into the market to shop their output.

As indicated in the Cohn Reznick report, if the Hartford plant is closed, the other plants simply could not absorb the 712,000 tons a year CRRA currently handles. As a result, unless the state identifies a reliable revenue stream to support continued operations at these plants, towns will be forced to pursue out-of-state landfill alternatives. Shipping trash out-of-state raises significant environmental and liability concerns.

We have supported legislation which defines in-state trash-to-energy facilities without bonded indebtedness as Class IIA renewable energy sources and establishes a temporary

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market for renewable attributes of such sources. This would provide the short-term relief necessary to support the continued operation of these plants.

COST is certainly open to discussing other options to support the continued operation of resource recovery plants. However, action needs to be taken this year to address these concerns and ensure that resource recovery plants will remain a viable, cost-effective waste disposal option for municipalities.

Thank you for the opportunity to comment.

**Testimony for the Resources Recovery Task Force
November 19, 2013**

My name is Gladys Ellis. I am President of North Hartford Seniors in Action and proud member of Connecticut Coalition for Environmental Justice or CCEJ. I am here to speak out for the phasing out of trash incineration in Hartford and our state as well as for expanding recycling and waste reduction alternatives. Hartford is the trash burning capital of the region, with the one of the largest incinerators in the nation. Trash is burned in Hartford 24 hours a day, 7 days a week, releasing toxins into the air we breathe.

We all know about the high asthma rates in Hartford and cities in our state. Many of the toxins we are breathing in from the trash incineration contribute to these high asthma rates. These toxins combine with other toxins Hartford residents are constantly exposed to create a toxic chemical soup. While the levels of toxins emitted by the trash incinerator may be legal, the impact on our health is concerning. The public health impact is particularly concerning for residents of the Low Income Communities of Color that surround both the Hartford and Bridgeport incinerators, that shoulder an unfair environmental burden.

There needs to be more focus on reaching and expanding our recycling goals, as an alternative to the dirty business of trash incineration. We, indeed, can do better as far as recycling and waste prevention. The fact that Connecticut is only at about a 25% recycling rate while San Francisco is at a 75% recycling rate shows we can do better. Neighboring Massachusetts is estimated to be at a recycling rate of between 36% and 44 %, much higher than that of Connecticut.

For every job created by incineration, recycling creates 10 jobs. Besides creating jobs, investment in recycling and waste prevention helps move us forward to the green economy of the future. That is one of the reasons why over 75 Hartford businesses signed on to our campaign to reduce trash incineration and increase recycling. Recycling and waste prevention is good for business.

**Testimony for the Resources Recovery Task Force
November 19, 2013**

My name is Joe Wasserman I am an organizer with Connecticut Coalition for Environmental Justice or CCEJ. I am here to speak out for the phasing out of trash incineration in Hartford and our state as well as for expanding recycling and waste reduction alternatives. Hartford is the trash burning capital of the region, with the one of the largest incinerators in the nation. Trash is burned in Hartford 24 hours a day, 7 days a week, releasing toxins into the air we breathe. This disproportionately impacts low income Communities of Color that are in close proximity to trash incineration in both Hartford and Bridgeport.

The Hartford City Council passed a resolution in February of 2012 calling for a reduction in incineration and increasing recycling and composting alternatives. The resolution raises a strong concern about the toxins released by trash incineration and it's impact on the health of Hartford residents. The resolution also calls for an increase in recycling alternatives. The Operational Review conducted by Cohn and Reznick , in their audit of CRRA call for CRRA to do more promotion of recycling and to consider having the towns share in recycling profits. We ask that the Resources Recovery Task Force and the State Legislature give strong consideration to the Hartford City Council Resolution and the above stated recommendations of the audit concerning recycling.

As long as there is a demand for waste by those who run trash incinerators, there is a built-in disincentive to fully move forward with recycling. The incinerator is always hungry for waste we should be recycling. What we burn we cannot recycle. The recycling rate for Connecticut is at about 25%. We lag behind Massachusetts which is estimated to be between 36% and 44%. The 75% recycling rate of San Francisco shows it is possible, if we are properly focused , to do much better. We fear that incineration is one of the factors preventing us from focusing on the need to increase recycling in our state. *Reaching and expanding our recycling goals needs to be at the top of the discussion taking place in the Resources Recovery Task Force and at the State Legislature.*

Sawyer, Lee

From: Ben Martin [bendicoot@yahoo.com]
Sent: Tuesday, November 19, 2013 3:16 PM
To: Sawyer, Lee
Subject: Testimony for Nov 19 Hearing on Incinerator Task Force

Thank you for the opportunity to speak about trash incineration in CT. I am a member of 350CT and Power without Pollution, organizations which advocate for a clean energy future in CT.

Trash to Energy plants are technology of the past that need to be retired as soon as possible and replaced with solar, wind and other non-polluting sources. These plants pollute the neighborhoods around them, raise the risk of cancer and respiratory illness and diminish the air quality of the entire state. The towns they inhabit not only suffer from mercury and dioxin emissions but also added pollution from the trucks bringing refuse from other towns, or states, to meet monthly tonage quotas. I experience this firsthand because I live in Wallingford where one of these plants operate.

The most glaring fact about burning trash is that it is completely unnecessary. Better ways of creating energy and dealing with trash have been developed since these facilities were built. A study by Stanford professor Mark Jacobson shows that it is possible to meet and exceed our energy demands with solar, wind, geothermal and micro hydropower. The study also shows that transition to these energy sources will boost employment more than trash burning power plants.

We have also developed better ways to reduce, reuse and recycle the materials that are currently in our waste stream. The amounts and type of raw materials that can be recycled today is much greater than when these plants were built. Composting of organic waste has risen for years, electronics are being "mined" for materials and product packaging has been reduced as companies look for ways to reduce costs.

The truth is that Connecticut does not need these facilities anymore, should not finance them or bear the negative consequences to our communities. Instead of propping up an industry whose time has passed we should be investing in energy sources that are clean, renewable and beneficial to Connecticut's citizens

Thank you,
Ben Martin
329 Ward St
Wallingford, CT 06492

Testimony to the members of the Resource Recovery Task Force
11/19/13

To Whom It May Concern:

Hi, my name is William Bradley, I am a resident of West Hartford, CT, on the border of Hartford, CT. I am here today to testify in regards to the subsidizing of the incinerating of trash in Hartford.

This measure concerns me as the incineration of trash is harmful to our environment, both locally and globally. The process of trash incineration emits 28 times as much Dioxin as, even coal plants, per unit of energy. Dioxin is considered the most dangerous chemical known to science. This poison enters our food chain and concentrates as it goes up the food chain. Incinerators also emit other toxins linked with respiratory problems, learning disabilities, and cancer.

It is estimated that air borne particles cause the deaths of 2 million people world wide each year. Trash incinerators produce microscopic air borne particles that can be lethal, contributing to cancer, heart attacks, stroke, and asthma.

As our society moves away from methods of dealing with waste, which cause pollution, towards greener practices, such as composting, reusing, and recycling, it is not only unwise environmentally, but financially, to make investments in outdated, harmful methods.

Thank You.

**Public Comment To the Resources Recovery Task Force
Abe Scarr, Connecticut Public Interest Research Group (ConnPIRG)
November 19th 2013**

Members of the Resources Recovery Task Force: Thank you for the opportunity to comment today. Thank you as well for volunteering your time for this task force and for your careful consideration of my and others' comments.

ConnPIRG is a statewide, nonpartisan, nonprofit, student and citizen funded public interest advocacy organization. We have worked on solid waste and recycling issues since the passage of the Bottle Bill in 1978. Two years ago, we launched our campaign for zero waste solutions for Connecticut.

Connecticut's over-reliance on incineration as a solid waste strategy is a public health threat, expensive to taxpayers, and a waste of valuable resources. We have made little progress towards our public policy goal of 58% diversion by 2024, set in the 2006 Solid Waste Management Plan.

As an active observer of the Task Force, there is much I would like to comment on. I have limited my comment to a few points, and will be happy to provide further detail upon request.

I. Reinforce Connecticut's solid waste and recycling policy priorities

Connecticut has two important guide posts for solid waste and recycling policy: the Materials Management Hierarchy and the Solid Waste Management Plan. The hierarchy is often referenced for the higher value it assigns to generating energy from burning material than it does to sending material to landfills. But the hierarchy of course places several strategies above incineration: source reduction, reuse, recycling and composting. Connecticut public policy has prioritized incineration for too long, to the detriment of strategies higher on the hierarchy.

The Solid Waste Management Plan set a goal of diverting 58% of material from landfills and incinerators by 2024. We have been stuck at around 30% since then. In order to achieve this goal, we will need to double diversion rates in the next decade – a challenging yet possible task.

These guideposts are important for your consideration for two reasons. First, as we are falling behind our goal to divert more material from the waste stream, we should not take action that pushes those goals further away or reinforces the status quo. If we are to mobilize additional public resources, they should be directed to new strategies that help us hit our diversion goals, not to an over-represented strategy facing economic challenges.

Second, as we make progress increasing source reduction and diversion, Connecticut will send significantly less material, or "fuel," to incinerators, which will present further challenges to their economics. Responsible planning should account for increases in diversion and the implications that has for the disposal market in Connecticut.

Please keep these principles and their implications in mind when considering recommendations.

II. Do not perpetuate a failing status quo

Connecticut clearly has problems with our current system, or we would not be here today. CRRRA is facing a large operating deficit and private operators claim similar financial challenges. As previously stated, our recycling and diversion rate is stagnant and well below our goals.

Unfortunately, most of the proposed solutions before the task force simply perpetuate the status quo with some variation on Connecticut taxpayers or ratepayers paying more to maintain current services.

If the business model of generating electricity from burning waste is faltering, why remain over-dependent on it? The appropriate response is to diversify.

If the problem is centered on CRRRA and their operations, why offer subsidies without reform? The appropriate response is a managed transition to a new approach.

It is challenging to provide specific comment on the options so far considered, as they have been presented as concepts rather than specific proposals. If the task force does recommend some form of subsidy, it should:

- not undermine other state public policy goals,
- be short term, and
- be tied to CRRRA reform and to real investment in Connecticut's reuse, recycling and composting infrastructure.

Finally, we do not support extending any subsidy designed to mitigate CRRRA's operating shortfall to the private operators in the state.

III. Do not undermine Connecticut's renewable electricity policy goals

The proposal to include electricity from incineration in the top tier of our renewable electricity standard has been considered and rejected multiple times. It should be rejected again. The purpose of the renewable electricity standard is to incentivize new, clean energy sources. Incineration is neither new nor clean and does not deserve Class 1 status or any other special carve out invented to achieve the same subsidy end.

IV. Provide further opportunity for comment

While we appreciate this opportunity for comment, and understand the short timeline the task force is working with, it is difficult to provide meaningful comment with no draft or proposal to comment on. We request the opportunity to provide written comment on a draft set of recommendations.

Thank you again for the opportunity to comment today.

Abe Scarr
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November 16, 2013

Hello my name is Johnny Johnson and I am with the CT Coalition for Environmental Justice. Today I will speak about the burdens that Hartford Residents face every day by the pollutes that effect our air daily. We breathe in soot, lead, mercury dioxin and others poisons. This ^{Link}creates/contributes to respiratory problems like asthma, emphysema, bronchitis, COPD, plus other serious illness: like diabetes, learning disabilities and cancer.

This is all cause by the incinerator that burns 2200 tons of municipal solid waste a day. This trash is burned 24 hours a day 7 days a week. They are planning to have Hartford as a trash holding area for other towns.

What are we going to do? Are we going to continue to house these dangerous business in our area? We invite you to join in with the CT Coalition for Environmental Justice to fight to keep these business from polluting our air. On Tuesday November 19th at 5pm at the department of energy & Environmental Protection before the "Resources Recovery" Task force there will be a discussion at 79 Elm Street, Hartford, CT. We are speaking out. We would your support.

By: Johnny A. Johnson

Connecticut Coalition for Environmental Justice Speaker Bureau



Testimony Before the Resources Recovery Task Force - November 19, 2013

We urge this task force to require CRRA to take responsibility for the pension OPEB (Other Post Employment Benefits) needs of the MDC workers who basically spent their careers working for the CRRA. The MDC had a twenty eight year contract with the CRRA to run the Mid-Connecticut Project.

CRRA has known about this debt for a very long time. We estimate that this pension and OPEB need will amount to about \$70 million. We have informed and reminded CRRA of their responsibility for this, as reported by the MDC, for years and years. Arbitration on the OPEB matter should begin on January 6. CRRA has blocked this arbitration, at hundreds of thousands of dollars of ratepayer costs, for about five years now.

CRRA's management has squandered much of the ratepayers' surplus on legal costs, paying themselves excessive salaries and on failed outsourcing contracts. Please do not let CRRA squander what is left of its reserves.

Also, if there was ever an organization that has outlived its reason to exist it is the CRRA.

A year and a half has gone by since Tom Kirk, CRRA's president, outsourced the Mid-Connecticut Project plant. As Council 4 AFSCME predicted, the outsourcing has been a disaster for the ratepayers and citizens of Connecticut.

The plant has largely run far below its capacity since the outsourcing. The plant is a publicly owned asset. It added millions per year in local energy generation, disposed of solid waste and brought and kept revenue to our region. The corporation to which Mid-CT was outsourced, NAES, had never before run a plant of this type and complexity. Our union warned that it would be difficult for a new operator with a workforce untrained in such a plant's operation to effectively run the plant. The lower benefits and wage paid to the privatized workers only adds to the problem of finding competent staff.

CRRA has now proposed an option turning the plant into a trash transfer station which will add hundreds of additional trucks to the already congested downtown Hartford traffic pattern.

Because many Hartford area towns have now lost faith in CRRA they have contracted with private corporations for trash disposal. President Kirk's answer to this has not been to perform better, but to ask the state legislature to put a special putative tax on these towns for sending waste out-of-state. This is of course an additional burden on working families during an economically difficult time.

President Kirk's only assertive act seems to have been to try and change the Mid-Connecticut Project name so that he can try and throw the public off the scent of the disaster that he has created. It is time for the state to disband the CRRA which only seems to serve to pay the high salaries of executives who used to run a trash to energy infrastructure that has been almost completely outsourced away. President Kirk has turned the CRRA into a strong net economic loss for ratepayers and the state. It's time to trash CRRA.

State Task Force –Public Hearing CRRA

November 19, 2013

I'd like to start by thanking the State Task Force for allowing this opportunity to express concerns about the Connecticut Resource and Recovery Authority, CRRA.

My name is Susan Allen. I live in Franklin, CT. In 2008, land in Franklin was slated for a new CRRA incinerator-ash landfill. Please know that I represent not only myself today, but also many of the residents and organizations in Franklin and the surrounding area. This is evidenced by the 158 signatures on a local petition and the 51 hand-written letters submitted as testimony in a legislative public hearing dated February 13, 2009 opposing CRRA activities in our area.

I realize that this is not a forum on incinerator ash landfills; however, since this is my vantage point, my comments will be intertwined with this topic. Franklin is a small, rural, typical New England town. Franklin is full of pride with a strong community spirit, valued large tracts of undeveloped land and open space, and a history rich in agriculture. On March 26, 2008 when it was announced that CRRA had chosen Franklin for a dump, residents were distraught.

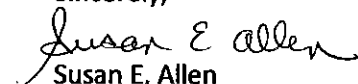
As information became more available, residents became even more desperate. Burning trash changes the chemistry of the waste and we felt this makes it even more toxic. The proposed site had a litany of concerns for us: the Class A aquifer right underneath; its close proximity to the Shetucket River which many fish and swim in; tarnishing local farms making their products suspect; heavy truck traffic on the already dangerous Route 32, and a negative impact of the regional and local efforts promoting ecotourism (Last Green Valley). And although we saw many a glossy brochure from CRRA telling us that the landfill would be contained, Franklin took heed while reading the Environmental Protection Agency acknowledgement that "eventually all landfills will leak". CRRA would be long gone and the good people of Franklin would be left with the environmental time bomb.

Therefore, we organized and formed the Residents of the Last Green Valley. Throughout the 1 ½ year fight, discussion arose that Franklin residents and other citizens felt as if we were being treated like backwoods, uneducated hicks and that CRRA had no regard for our opinions or our ideas for other options. They had deemed this property to be suitable and with eminent domain on their side, it didn't matter what we had to say. Many found the CRRA to be hostile and non-approachable. We found them cloaked in secrecy and intimidating. This dump was going to be railroaded down our throats.

In the course of my involvement with the CRRA ash landfill, it was stated to me from several different people outside of Franklin, that CRRA was arrogant and had too much power. I spoke with landowners of the actual proposed site and the implication was that they felt bullied and that there was no other options then dealing with CRRA because of eminent domain issues.

Unfortunately CRRA's reputation seems to be damaged, partly due to the nature of their business but mostly due to the actions of some in management. My vote would be one of no-confidence. Therefore instead of subsidies and entitlements to the embattled CRRA agency, time and money could be better spent trying to solve the insurmountable problem of trash and waste in our state and the country.

Sincerely,


Susan E. Allen

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