

November 18, 2009

Mr. Daniel Hall
Massachusetts Department of Environmental Protection
Dwight Street
Springfield, MA
daniel.hall@state.ma.us

RE: Palmer Renewable Energy (PRE) BUD Permit – Provisional Permit Approval

Dear Mr. Hall:

I am a registered environmental engineer with an M.S. in Environmental Engineering, a Ph.D. in Civil Engineering, and approximately 28 years of professional experience. I have studied issues surrounding the burning of construction and demolition debris (CDD) for the past several years, including air emissions, ash, sorting methods and challenges, quality control challenges, permit compliance problems, and spontaneous combustion of fuel piles.

The proposition of burning CDD and calling it “beneficial use” is completely wrong and outrageous. Actual beneficial use would consist of deconstructing rather than demolishing buildings, separating the various materials, reusing what can be reused, recycling what can be recycled, and then disposing of the small amount that is left, perhaps in a landfill where it can be contained until we find a safe way to deal with it and phase out this dangerous waste over time. Recent projects indicate that upwards of 90 percent of the materials in a building can be readily reused or recycled. It is a simple matter of planning, intelligence, and doing things a different way. To release CDD contaminants into the air is not a solution – it creates a new problem.

The proposed “use” of incineration is dangerous, reckless use, not beneficial use, and it is damaging abuse of the public health and natural resources owned by the public (e.g., air). It emits copious amounts of carbon dioxide – far more per unit of electricity generated than any other fuel source, heavy metals, dioxins and furans, and other pollutants and it generates hazardous ash, all the while discouraging waste minimization and reuse and recycling.

There are no scientific studies to my knowledge that demonstrate that burning of CDD is safe for human health and the environment. I have searched the literature for such information and it is not there. The Northeast States Coordinated Air Use Management (NESCUM) issued a report on the subject which leads the reader to think all is well with burning CDD, but that report is not

reliable and based on very thin data. Please see my critique of the NESCAUM report, which is attached.

To the contrary, the information I have reviewed indicates that 1) the issue has been very poorly studied, and 2) the sparse data that are available set off alarm bells rather than provide reassurance. The problems are many, and are simply glossed over in DEP's BUD provisional permit approval. CDD is a nasty material and a nasty fuel. Emissions are significant and harmful. One has to consider stack emissions, truck emissions, dust, deposition of air pollutants onto soil and water, all on top of air quality that locally is already bad. The sum is what people are exposed to and lives are at stake. DEP is ignoring all of these risks.

Controlling fuel quality is near impossible, as anything can get into the fuel and one can only test adequately by paying far more for testing than the fuel is actually worth. The fuel is inherently dangerous. Yet DEP would blithely rely on the proponent to test the fuel for just a few of the many possible contaminants. There was a recent report of cesium-contaminated wood chips in Europe. DEP does not call for testing for radionuclides so no one will ever know if radionuclides are being released. This is just one example of inadequacy of DEP's sampling requirements.

CDD incinerators find it near impossible to comply with their permits because their operations are so dirty. Yet regulatory agencies never shut them down. They just allow the incinerators to keep damaging human health and the environment. It is brutally obvious who the regulators are serving, and it is not the public. Anything to protect the incinerator profiteers – nothing to protect human health and the environment. Why is that?

Once again, DEP is a lap dog to incinerator developers, abandoning its job requirement of protecting human health and the environment. DEP must start relying on science again. DEP needs to start listening to and responding to valid technical comments from the public instead of just summarily ignoring them and accepting any old junk science from incinerator profiteers, as has been the case with Russell, Greenfield, and now Palmer. I challenge DEP to put forth valid, scientific information that assures that the burning of CDD is safe for human health and the environment, or require the incinerator developers to do this. Don't just approve the BUD and "wing it," with no idea what the consequences will be to human health and the environment. This is the trajectory that DEP is now on, flying blind.

This facility should not be permitted anywhere, but it is the height of irresponsibility that DEP would allow such a polluting enterprise in a densely populated neighborhood. And, predictably, the neighborhood is low income. This is a classic environmental injustice situation.

DEP is like a dog without a bone, who just will not give up the concept of combusting materials to produce electricity. Don't you get it? Climate change demands that we stop doing this – we need to reduce carbon dioxide concentrations in the atmosphere immediately. Resource constraints demand that we reuse and recycle more. We need to move onto a path of sustainability. It is a basic IQ test that to date DEP is flunking. DEP needs to get with the 21st

Mr. Daniel Hall
November 18, 2009
Page 3

century. DEP's current policies and actions with regard to incinerators are negligent, unconscionable, and in a trajectory that is the exact opposite of where we should be going. The PRE project should be abandoned – the meager benefits would be far outweighed by the damages. Calling damaging abuse “beneficial use” would be a joke if the consequences weren't so serious. DEP, wake up!

Very truly yours,

A handwritten signature in cursive script that reads "Ellen Moyer".

Ellen Moyer, Ph.D., P.E.

Attachment: Evaluation of NESCAUM Report