

Requests re: Transitioning from Incineration to Zero Waste

From: Camden For Clean Air <getinvolved@camdenforcleanair.org>

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Dear Camden County Commissioners:

We write you requesting that Camden County work sincerely to end our use of incineration of the county's trash, use the county's power to stop Covanta's plan to burn liquid industrial wastes, and retain certified Zero Waste consultants to prepare comprehensive Zero Waste protocols and implementation plans as part of the critical transition away from trash incineration.

The City of Camden, the host community, is an Environmental Justice community that has been severely and disproportionately impacted. For decades, Camden has been ground zero for the continuous hazardous air emissions and a legacy of pollution from this facility that is our county's largest industrial air polluter by far.

Camden County coordinates the cooperative purchasing contracts that could soon lock in all but a handful of Camden County's municipalities into continuing to burn trash in Camden City through 2026. This is unacceptable. The county's bids have contained language that artificially limits the options and does not need to lock municipalities into multi-year commitments. The county can also use its contracting power to ensure that if Covanta gets the contract, it must not burn liquid industrial wastes. More on our recommendations at the end of this letter.

Camden County needs to be prepared for the abrupt closure of the aging Covanta Camden trash incinerator. The incinerator will be 32 years old in March. The average age of the 48 trash incinerators that have closed since 2000 was just 24. Rarely do incinerators make it past the age of 40. It's typical that incinerators this old experience increased operations and maintenance problems and breakdowns. It's not unusual for older incinerators to close or break down, before their waste contracts expire. Wheelabrator's 35-year old Portsmouth, Virginia incinerator is scheduled to close in January 2024, years before its waste contracts expire, simply because the plant will no longer be economically viable. That plan was before the recent fire that closed the plant down – the second such fire in the past year.

Abrupt, unexpected closures of incinerators are not unusual. The Detroit incinerator closed for good with no notice in 2019, requiring the city and suburban municipal customers to redirect waste on a dime. The Covanta Fairfax trash incinerator in Virginia closed for 11 months in 2017 after a huge fire caused \$40 million in damage, requiring the District of Columbia and Northern

Virginia communities to make other plans for their waste. Before the Hartford, Connecticut incinerator closed for good this past summer, both of the plant's generators failed at the same time a few years ago, causing trash to pile up illegally as the state struggled to make other plans. Within the term of any new contract with Covanta, the facility could become unavailable, perhaps without notice, and the county needs to have a backup plan.

Greenhouse gas emissions from trash incineration are roughly twice that of landfilling the same waste, no matter the transportation distance involved. CO₂ emissions from trash incineration are about 65% worse than burning coal. Incineration does not replace landfills, but makes them more dangerous by filling them with toxic ash. For every 100 tons of waste burned, about 30 tons of toxic ash are produced and shipped to landfills – in our case, to the Gloucester County Improvement Authority landfill in South Harrison Township.

Zero Waste is defined as “the conservation of all resources by means of responsible production, consumption, reuse and recovery of products, packaging and materials *without burning* and with no discharges to land, water, or air that threaten the environment or human health.”

A Zero Waste system is a cyclical, 21st century solution, the global choice for sustainable cities using a circular economy approach that involves redesigning our systems and resource use from product design to recovery to prevent wasteful, costly, polluting and climate damaging practices. Zero waste initiatives are flourishing worldwide with aggressive efforts to move away from incineration facilities. The Network of Zero Waste Municipalities in Europe has more than 350 active cities that are on the road to zero waste with some managing to divert more than 90% of their waste from landfills or incinerators. Villages, towns, and cities across the globe are making real progress toward the goal of zero waste.

There are real cost savings through the implementation of zero waste strategies, especially those higher on the Zero Waste Hierarchy such as source reduction and reuse, but also composting of food scraps, which is a large portion of the waste stream for which there is no universal curbside collection service. Diverting organic waste would save millions of dollars in tipping fees each year.

In December 2021, the County Executive of suburban Montgomery County, Maryland directed his Department of Environmental Protection to prepare for closure of its county-owned incinerator within 12-18 months – three years before the end of their contract. The county has hired zero waste consultants to guide the county's transition. Similarly, Delaware County, Pennsylvania has hired a zero waste consulting team to guide their transition away from burning the county's trash in the nation's largest trash incinerator, located in a small city within a suburban Philadelphia county – a textbook case of environmental racism similar to our county's situation. Delaware County was specific in their RFP to call for a certified Zero Waste consultant to respond and to apply the internationally peer-reviewed definition of Zero Waste and the Zero Waste Hierarchy as guiding principles in their county solid waste plan. They will start to divert trash away from Covanta's incinerator in Chester, PA in January 2023.

We urge you to take the actions necessary to ensure the hiring of consultants with the proper expertise in transitioning from incineration toward Zero Waste so that the county can follow the lead of other suburban counties working to gain from the jobs, health, economic, environmental and potential cost-saving benefits of such a transition.

We also insist that the county's cooperative purchasing bid for a waste disposal contract must be reworked to provide the flexibility and accountability that Camden City and County residents, and our municipalities, deserve. We've heard county officials express a desire to no longer incinerate trash, but concurrent statements acting as if there are no other options, pointing out that usually no other companies respond to bids other than Covanta. This may be because other companies cannot beat Covanta's price that is subsidized by state taxpayer dollars. It's also because Camden County's waste bids place a prohibitive \$5/ton charge on waste brought across a toll bridge, as if that is intended for tolls, when tolls are paid per truck, not per ton.

We ask that the County:

1. Issue two cooperative purchasing waste contract bids, with terms that start 1/1/2024. In both, **fix the \$5 additional cost per ton for out-of-state facilities and make it a cost per truck that matches the actual bridge tolls**, if the toll cost is not already wrapped into their bid price. Also, **both should have no guaranteed minimum amount of trash that effectively punishes the county for reducing waste.**
 - a. Bid #1: Only landfills permitted as disposal options. Contract term of five years with extension options. Allow for handling of as much waste as the bidder can manage if they're unable to handle the full amount produced by the county.
 - b. Bid #2: Incinerators and landfills permitted as disposal options. Contract term of one year with extension options.
 - i. Require that any successful bidder whose disposal option includes combusting waste shall only accept ID 10 (municipal solid waste), that facilities burning other types of waste shall not be eligible for the contract, and burning wastes other than ID 10 waste would be a breach of contract.
 - ii. Do not give title to the waste. **Follow the lead of Delaware County, PA where the contract allows waste to be sent elsewhere during the term of the contract.**
 - iii. Allow municipalities to opt out.
2. Solicit long-term volume prices from Cumberland and Gloucester County's public landfills since they aren't likely to bid, but may agree to a certain amount of waste and to a lower price for larger and longer-term volumes.
3. Hire a certified Zero Waste consultant to develop a Zero Waste Plan for the County.

Sincerely,

Benjamin Saracco and fellow members of Camden for Clean Air



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