

# TOWN OF COEYMANS

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December 27, 2017

Dear Governor Malloy and DEEP Commissioner Klee:

We are concerned that the State of Connecticut is seriously considering a proposal that relies on burning 116,000 tons of trash per year in the cement kiln in our Town.

DEEP is considering a proposal by Mustang Renewable Power Ventures, which is one of three finalists that may be chosen by the end of this month.<sup>1</sup> You have a choice. Connecticut Public Act No. 14-94 states that the Commissioner of Energy and Environmental Protection “may” select one of these three final proposals on or before December 31, 2017 and direct the Materials Innovation and Recycling Authority to enter into an agreement for redevelopment of the aging trash incinerator in Hartford, known as the Connecticut Solid Waste Management System Project.<sup>2</sup> We understand the need to replace the aging trash incinerator in Hartford. However, we object to replacing it with waste burning in our Town.

This proposal by Mustang Renewable Power Ventures was to have some recyclables removed from the trash from 70 Connecticut towns, and the rest would be baled, shipped to the LafargeHolcim Ravena cement plant in our Town, shredded, and burned in their kiln.<sup>3</sup> We see that the proposal on the DEEP website was recently edited, well after the end of the public comment period, to remove references to LafargeHolcim, which raises even more questions about the legitimacy of this process.

This LafargeHolcim plant has long been one of the largest air polluters in New York State and trash is an even dirtier fuel than coal by many measures.<sup>4</sup> We are not willing to become the backyard for 116,000 tons/year of Connecticut trash, risking increased pollution from air emissions at our local cement plant.

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<sup>1</sup> [http://www.ct.gov/deep/cwp/view.asp?a=2718&q=570556&deepNav\\_GID=1646](http://www.ct.gov/deep/cwp/view.asp?a=2718&q=570556&deepNav_GID=1646)

<sup>2</sup> Public Act No. 14-94, p.3. <https://www.cga.ct.gov/2014/act/pa/pdf/2014PA-00094-R00SB-00357-PA.pdf>

<sup>3</sup> [http://www.ct.gov/deep/lib/deep/waste management and disposal/solid waste/mira rfp/  
mustang response to rfp executive summary.pdf](http://www.ct.gov/deep/lib/deep/waste%20management%20and%20disposal/solid%20waste/mira_rfp/mustang_response_to_rfp_executive_summary.pdf)

<sup>4</sup> <http://www.energyjustice.net/incineration/worsethancoal>

The Mustang proposal is not viable. We have a long-standing relationship with this cement plant. Having recently learned about this Mustang proposal, we inquired with LafargeHolcim and were told by their spokesperson that the plant is not part of this Mustang project. In fact, they have published a local paper a statement by their plant manager that they do not intent to accept this waste. If that is true, then this calls the Mustang proposal into question. **Regardless of LafargeHolcim's intent, our Town is determined to prevent this and any other commercial waste burning within our borders, which would render the Mustang proposal invalid as it stands. New York municipalities have the legal authority to regulate air pollution and solid waste, and we plan to use the authority available to us to ensure that our Town is not a destination for commercial waste burning of any sort.**

Should LafargeHolcim agree to accept Mustang's "Processed Engineered Fuel" at their next closest plant, that would mean trucking it another 100 miles to the company's plant in Whitehall, Pennsylvania, which would surely impact the economics of Mustang's proposal.<sup>5</sup>

Mustang's history is not encouraging. According to a December 2016 article, Mustang is the developer of a project in Santa Barbara County, California where the local Community Environmental Council has argued that the plan costs \$50 million more than it should, with tipping fees jumping from \$87/ton to \$120/ton – an increase of 38% – with part of this covered by a 14.6% increase in trash bills. Like Mustang's proposal before you, they claimed in California that "compost" from the processed trash would be eagerly purchased by area farmers, yet the reaction from local farmers has been quite different. A local attorney is quoted saying: "What we've been hearing from farmers is, 'No way' ... They'll make their own compost before putting trash-derived compost on their land."<sup>6</sup> Additional reporting on the project shows that the project was initially to be privately financed, but after tipping fees came in higher than expected, a public financing model had to be established, putting the cost on a number of area cities.<sup>7</sup>

Prince George's County, Maryland recently went through a similar process to yours, evaluating various "waste-to-energy" schemes, and choosing seven finalists, including two of the three being considered by DEEP: Mustang Renewable Power and Covanta.<sup>8</sup> After much time and money was spent pursuing these proposals, the county abandoned their entire contract process in August 2016, scrapping all of the proposals and moving forward with development of a Zero Waste Plan with much public involvement from community stakeholders.<sup>9</sup>

The other two proposals DEEP is considering rely on incineration in your own backyard, either in Hartford or Bristol. Trash incineration is the most expensive and polluting way to manage waste or to make energy.<sup>10</sup> It is more damaging than landfilling, and still sends toxic ash to

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<sup>5</sup> It's 112 miles from Hartford, CT to Ravena, NY and 215 miles from Hartford, CT to Whitehall, PA.

<sup>6</sup> <https://www.independent.com/news/2016/dec/02/city-considers-tajijuas-landfill-deal/>

<sup>7</sup> <https://www.independent.com/news/2016/jul/14/doubling-down-dirty-merf/>

<sup>8</sup> <http://www.energyjustice.net/md/pg/victory>

<sup>9</sup> <https://www.princegeorgescountymd.gov/2651/Zero-Waste-Draft-Plan>

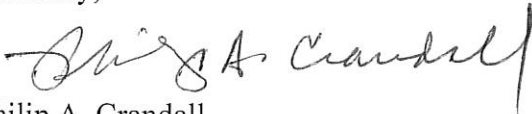
<sup>10</sup> <http://www.energyjustice.net/incineration/>

landfills. While some landfilling will always be needed, the best option in terms of air pollution and global warming is a Zero Waste approach with minimized landfilling and no incineration.<sup>11</sup> New York wisely does not recognize trash burning as a renewable energy source.<sup>12</sup>


There is a long history of waste incineration polluting the environment. Local governments in Albany County have moved away from trash incineration years ago, and saw the state-run incinerator in the City of Albany close in 1994.<sup>13</sup>

**Please know that as a Town Board we will do whatever is within our power to make sure trash (however processed) is not burned in our community.** We would recommend that you follow the lead of Prince George's County by dropping the current three proposals and developing a strong Zero Waste Plan that does not rely on any sort of incineration.

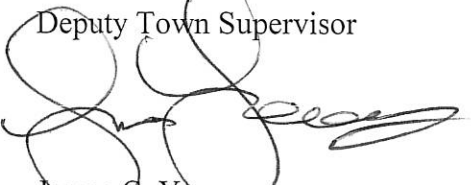
Sincerely,



Philip A. Crandall  
Town Supervisor



Thomas E. Dolan  
Deputy Town Supervisor



James C. Youmans  
Town Councilman

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<sup>11</sup> See the Zero Waste Hierarchy here: <http://www.energyjustice.net/zerowaste/> and a report on how to best manage waste on the path to Zero Waste here: <http://www.ecocycle.org/specialreports/leftovers>

<sup>12</sup> The environmental reasoning for rejecting Covanta's bid for Renewable Portfolio Standard eligibility in the State of New York, which has been repeatedly rejected, is outlined well in these comments from the New York State Department of Environmental Conservation: <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={DEEA097E-A9A6-4E53-898C-0BC2F4C60CC4}>

<sup>13</sup> <http://www.csmonitor.com/1994/0208/08111.html>