



Connecticut Chapter
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To: Brent Madho, Waste Engineering and Enforcement Division
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127

Mr. David LaRiviere, Bureau of Air Management
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127

Re.:

Solid Waste Permitting: Applications nos. 202103504 (Modification of a resources recovery facility), 202107639 (New Biomedical Waste Treatment Facility), 202305513 (Renewal of permit to operate a resources recovery facility)

Type of Permit: Modification and Renewal of Permit to Operate and Establishment of a Biomedical Waste Treatment Facility

Air Permitting: Application Nos.: 202303932, 202303933

Type of Permit: Minor Modifications to New Source Review permits for MWC Unit #1 and Unit #2: 358 TPD Ogden Martin Systems, Martin Reverse Acting Stoker Grate, Waterwall Furnace, Water-Tube Boiler Systems (Nominally Rated at 122 MMBtu/hr each) with Auxiliary Burner Systems (Rated at 50 MMBtu/hr each). The minor modifications are to allow for the firing of biomedical waste in accordance with the Permittee's applicable Bureau of Waste Management permit.

Dear Messrs. Madho and Lariviere:

On behalf of the Sierra Club and our more than 30,000 members and supporters in Connecticut, thank you for the opportunity to submit comments in OPPOSITION to the draft permits for Reworld, Inc. to burn biomedical waste (BMW) in Bristol.

Connecticut has some of the worst air quality in the country. This is especially true in our cities, where asthma rates are soaring. Connecticut is also one of the states most dependent on waste incinerators to manage its growing waste stream, after well-meaning legislators closed down our stinky landfills decades ago, and built five so-called “waste-to-energy” incinerators around the state. Is it a coincidence that these facilities are major polluters in several environmental justice communities, especially Bristol and Bridgeport? It is no coincidence. These communities have borne the burden of these toxic emissions for decades and the public health has suffered for it. This injustice must be acknowledged and mitigated. Instead, Reworld plans to make it worse for Bristol residents.

Waste incinerator emissions, including emissions from burning medical waste, contain many harmful substances, including particulate matter, sulfur dioxide, hydrogen chloride, nitrogen oxides, carbon monoxide, lead, cadmium, mercury, PFAS, and dioxins/furans. They are a serious threat to public health, causing or worsening chronic illnesses like asthma, respiratory illnesses, heart disease, cancer, neurological disorders, preterm births, and leading to thousands of premature deaths annually. Dioxins, furans, and PFAS are notorious for their persistence in the environment and their ability to bioaccumulate, leading to long-term health impacts.

The draft permits fail to adequately mitigate or measure these risks. They do not require more stringent emissions controls or continuous emissions monitoring for these toxins, even though such technology is proven, available, and mandated by a growing number of jurisdictions. In partial response to these concerns, Covanta committed to installing additional technology to monitor mercury levels and ensuring that this was stipulated in the draft permits during the public participation process. However, this requirement is absent from the permits.

The incinerator is situated in a community that ranks above the 99th percentile in Connecticut for the release of toxic chemicals. The permits do not address the cumulative health burden experienced by local residents and fail to live up to the spirit of Connecticut’s environmental justice (EJ) law – a law which the operator claims it does not have to comply with. Furthermore, the siting of the facility near the city line means that much of the affected population was not included in the EJ or public process.

Noise pollution ranks second to air pollution as the environmental exposure most harmful to health, yet the draft permits provides no relief for noise pollution emanating from the plant. Instead, they carry forward the provisions of the existing permit on noise, which are inappropriate for industrial noise and lack needed monitoring and adequate enforcement mechanisms.

Under the permits, over 1,000 trucks could transport chemotherapy, pathological, and infectious wastes up to biosafety level 4 into the state annually, posing a risk of accidental releases not only of toxic chemicals but of pathogens that are easily spread, fatal, and for which there is no treatment. The draft permits do not satisfactorily address the transportation of such dangerous materials in a state that already struggles with truck crashes and spills.

The draft permits would position Connecticut as one of the few states hosting a major medical waste incinerator, importing waste from across the Northeast. This is unnecessary given that safer, non-burn technologies like autoclaves are used nationwide to process medical waste. With over 99% of medical waste incinerators closing down since the 1980s, and states such as Delaware and Rhode Island now banning medical waste incineration, it is clear that incineration is neither the standard nor the best practice for handling biomedical waste.

BMW incineration creates risks that are unacceptable, unnecessary, and that have not been adequately considered in the regulatory process.

In light of these concerns, I urge DEEP to reconsider the issuance of the draft permits.

Thank you for your attention.

Sincerely,

Susan Eastwood
Chapter Chair, Sierra Club CT