

July 12, 2021

Hartford Solid Waste Task Force
City of Hartford
550 Main Street
Hartford, CT

RE: Connecticut Zero Waste Coalition response to the Hartford Solid Waste Task Force *Vision for Sustainable and Just Waste Management*

To the Hartford Solid Waste Task Force:

This letter is written in response to your document titled *Vision for Sustainable and Just Waste Management*, which you have produced for the City of Hartford (attached).

The mission of the CT Zero Waste Coalition is to eliminate negative environmental impacts and disproportionate burdens on Connecticut's low-income and communities of color, and to advance innovative and sustainable waste solutions.

The history of waste disposal by incineration in Hartford has been a legacy of environmental degradation and human harm to Hartford's Environmental Justice community. People of color and low income residents have long and disproportionately borne the heavy burden of Connecticut's inequitable and unjust municipal solid waste management practices, as most of the state's waste was regionally gathered to be burned at incinerators in Bridgeport and Hartford.

We appreciate that your task force endorsed some waste reduction strategies such as unit-based pricing and source separation of food waste in your vision. Nevertheless, we see the pitch in your proposal to be for a single mixed waste processing facility which would be partly funded by the state of Connecticut. The facility you propose results in partial recycling and reclamation of some waste and will not effectively reduce waste in a way that will protect the public health of Hartford residents. It is by no means a Zero Waste proposal.

In keeping with our mission, and mindful of *The City of Hartford Court of Common Council Certified Resolution* dated October 28, 2020¹, in which Hartford adopts the Zero Waste International Alliance definition of Zero Waste, directs your task force to work with Zero Waste consultants and the Department of Public Works (DPW) to "develop a

¹ City of Hartford Court of Common Council Resolution passed October 26, 2020. (Certified October 28, 2020). https://drive.google.com/file/d/19iNOAsw9fE_iFiGmyLayQzDLE0Vj2W/view?usp=sharing

zero-waste plan for the City,” and adopts a 90% waste reduction goal by 2045; we offer the following comments in response to your vision document:

- 1) The Zero Waste International Alliance definition of Zero Waste is as follows:
*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.*²
- 2) The consultant you cite in your vision document is GBB. GBB developed the waste incinerator in Preston, CT. On December 8, 2020, GBB made a presentation to the City of Hartford, in which they recommended three mixed waste processing facilities identical to the single facility you recommend. According to GBB, the proposed facilities (including the one you recommend) look just like Municipal Recycling Facilities (MRFs) because they use the same equipment and provide the same services. The proposed facilities, according to GBB, would take in unsorted mixed waste, sort it to remove recyclable and reusable materials, and send an estimated **40-50% of waste that cannot be otherwise managed** to what GBB describes as the “simplest” alternative - **a fuel to be burned** in industrial boilers and cement kilns.³

By failing to source separate, using mixed waste processing achieves a lower diversion rate than could be accomplished with a thorough Zero Waste system.

- 3) **Your task force vision and GBB’s proposed mixed waste processing facilities fail to meet the basic requirements of Hartford’s resolution** - to adopt real Zero Waste definitions which prohibit burning and to meet a 90% waste reduction goal as compared to 2019’s disposal rate. Furthermore, GBB is not a Zero Waste consultant, given their consistent long-time promotion of incineration, including helping develop the incinerator in Preston, CT.

Near-term, under your plan and GBB’s proposal, what would not be burned in our state or elsewhere would need to be shipped to out-of-state landfills.

² Zero Waste International Alliance. (2018, December 20). *Zero Waste Definition*. <https://zwia.org/zero-waste-definition/>

³ Simmons, Steve. (2020, December 8). *Advances in Waste Processing and Conversion: A Report for the City of Hartford Solid Waste Task Force*. [Google Slides]. Google Drive. GBB President, Gershman, Brickner and Bratton, Inc. https://drive.google.com/file/d/1A7I175BaBwBcclw_95kG_tuJRJ21UkP9/view?usp=sharing

None of the costs to ship, export or import waste are part of your plan. In fact, no costs at all are defined. GBB's presentation to your task force is a bit more specific since it provides a rough figure of \$225 million to cover facility capital and operating costs for a three-facility system. We note, however, that other costs are *not* part of their analysis. In particular, GBB states that the cost of disposal for residual waste, which could not be managed by their proposed system, was *not* included in their rough figure.

This proposal fails to account for residuals management and its costs; this is a fundamental flaw in the proposal and shows insufficient planning.

Your vision document simply recommends that Hartford become the first, costly stop in a regional plan to spread the harm rather than stop the burn.

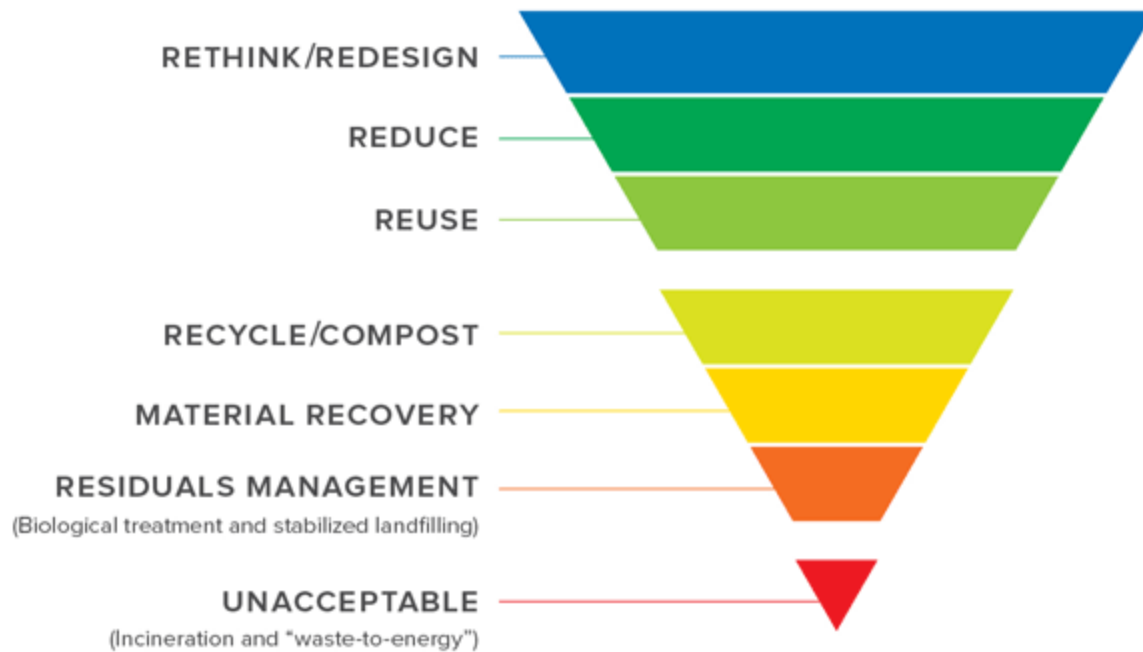
In order to meet the requirements of Hartford's resolution, we recommend you rethink and redesign Hartford's vision under the *Zero Waste International Alliance's Hierarchy of Highest and Best Use*.

We further urge you to follow the state's lead in adopting unit-based pricing (the most effective and cost-effective way to quickly reduce trash), curbside composting collection, and improved recycling systems with adequate educational programs to ensure success.

For the waste that remains, we encourage that you follow the back end of the Zero Waste Hierarchy that you've adopted: Material Recovery and Biological Treatment (MRBT) prior to landfilling the small, stabilized residual.⁴ This would utilize similar equipment and facilities as mixed waste processing, but only after thorough source separation, and with the addition of the anaerobic digestion of the organic fraction of municipal waste to maximize capture of gases and avoid gas and odor impacts at the landfill. This last step would also reduce water weight, saving money on hauling costs.

⁴ Jeffrey Morris, et. al., "What is the best disposal option for the 'Leftovers' on the way to Zero Waste?," May 2013. www.ecocycle.org/specialreports/leftovers

THE ZERO WASTE HIERARCHY 7.0



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Under a Zero Waste vision, garbage is not a commodity and waste is never feedstock for polluting energy plants. Waste is simply waste, and only solutions that reduce it are real or safe.

By using effective Zero Waste measures, your task force can lead Hartford into a future that fosters environmental justice, meets sustainable waste reduction goals, and better protects the health of residents, the environment and our climate. We look forward to seeing *The City of Hartford Court of Common Council Certified Resolution* implemented and we are confident that the Zero Waste solutions we have outlined in this letter will help meet Hartford's waste management goals.

⁵ Zero Waste International Alliance. (2018, December 20). *Zero Waste Hierarchy of Highest and Best use*. <https://zwia.org/zero-waste-definition/>

Sincerely,

Connecticut Zero Waste Coalition

and participating members:

BYO CT - Jeanine Behr Getz

Clean Water Action Connecticut - Anne Hulick, State Director

Connecticut Coalition for Environmental Justice - Sharon Lewis, Executive Director

Connecticut League of Conservation Voters - Lori Brown, Executive Director

Energy Justice Network - Mike Ewall, Executive Director

Environment and Human Health, Inc. - Patricia Taylor, Director of the Plastics and Waste Reduction Project

Save the Sound - Alex Rodriguez, Climate Organizer

Sierra Club Connecticut - Susan Eastwood, Chapter Chair

The CT Zero Waste Coalition seeks to support waste reduction methods that consider the elimination of negative environmental impacts and disproportionate burdens on Connecticut's low-income and communities of color, and to advance innovative and sustainable waste solutions, in order to divert Connecticut's waste from landfills and incinerators and significantly improve the environment and the health and well-being of all Connecticut residents.

TO: Hartford Solid Waste Task Force:

Thomas Swarr, Chairperson

Clarence W. Corbin, P.E., Member

Sam King, Member

Mark A. Mitchell, MD., Member

William Diaz, Member

James Sandler Esq., Member

Councilman James Sanchez, Ex-Officio Member

CC: Governor Ned Lamont

Mary Glassman, Aide to the Governor

Congressman John Larson

Commissioner Katie Dykes, DEEP

Mayor Luke Bronin, Hartford

Hartford City Council, Council President Maly D. Rosado

Hartford State Senators and Representatives:

Senator John Fonfara

Senator Douglas McCrory

Representative Julio Concepcion
Representative Minnie Gonzalez
Representative Joshua Hall
Representative Brandon McGee
Representative Matthew Ritter
Representative Edwin Vargas
Connecticut Zero Waste Coalition and members