WHY THE COVANTA MARION INCINERATOR
SHOULD NOT RECEIVE RENEWABLE ENERGY CERTIFICATES

A position paper from the Clean Air Now Coalition against HB 4049

We oppose the awarding of renewable energy certificates for electricity produced by the Covanta Marion waste incinerator in Brooks, which is the 19th largest industrial producer of greenhouse gases in the State and number one in Marion County. [1]

The waste management choice in Marion County is not incinerator versus landfill. It is incinerator versus very significant waste reduction. Jurisdictions across the world are targeting a 90% reduction in their waste stream, and so should Marion County.[2,3,4,5] Also, the electricity that the incinerator produces can be replaced by sustainable sources with virtually no pollution. Once the waste stream is minimized, methane from landfills will cease being the problem it is today because most of the organic matter that produces it will have been removed from the waste stream and composted. **Landfill usage would also shrink very dramatically.**

Oregon DEQ includes energy recovery from waste in its waste management hierarchy, but it specifies that this recovery is to be done only "so long as the energy recovery facility preserves the quality of air, water, and land resources." That is not happening with the Covanta Marion incinerator. Although the incinerator operators boast that they meet and exceed Oregon and EPA emission standards, those standards are not currently at levels that protect public health and the environment. The standards are very lax because until now they only needed to satisfy "best available control technology" requirements – even if those requirements allowed toxic emissions that are far higher than the levels required to protect health. Only with the advent of Cleaner Air Oregon rules will the emissions limits even begin to come close to being protective.

To illustrate this fact one only has to look at the current EPA emission limits for a large new medical waste incinerator. DEQ emissions reports for the Covanta Marion incinerator show that over the past seven years it has exceeded those limits for unhealthy gases (nitrogen oxide, sulfur dioxide, hydrogen chloride, and carbon monoxide) and heavy metals (mercury, cadmium, and lead) by several times over in some cases. (See the table provided by Oregon DEQ at the end of this document.[6,7]) A given level of toxic emissions is just as toxic from a facility called a "municipal solid waste incinerator" as it is from one called a "medical waste incinerator". The Covanta Marion incinerator's increasing tonnage of out-of-state medical waste is putting it very close to being classified as the latter anyway.

The incinerator operators boast that the County's share of the incinerator's electricity and tipping fee profits allow it to fund its Environmental Services recycling and waste reduction program. That is similar to selling heroin to fund a drug treatment program. The harm done by the incinerator's pollution and burning of useful resources more than negates any utility that it has. We don't want to sell out the health of our families just to bolster the County budget nor create far more greenhouse gases than would result from waste reduction.

Also, the incinerator is not much of a "budget bolsterer" after you subtract all of the costs the County has incurred for incineration, such as payments to Covanta to upgrade their equipment, a failed ash leachate evaporator, hauling leachate to Toledo and eastern Oregon, hauling to landfills the toxic ash that weighs about 25% as much as the original trash that was burned, maintaining a multi-million dollar liability fund required by DEQ for the ash piles near Woodburn, paying for maintenance of the ash piles (leachate removal system, staff costs, etc.), cost of removing metals from the ash, etc..

Proper funding of Environmental Services efforts from other sources could reduce the waste stream so incineration and its high costs are unnecessary. That would end the excessive incinerator tipping fees that raise trash collection rates for citizens and also reduce the total cost of landfilling any residual waste to a small fraction of what the incinerator operators charge. Salem residents in Polk County already pay less for trash collection than in Marion County because their trash goes to the Coffin Butte Landfill rather than the

incinerator. Residents on both sides of the Willamette River could reduce their trash much further by implementing proper materials management programs as advocated by DEQ.[5]

The County's contractual requirement to provide enough waste to keep the incinerator operating at full capacity reduces the opportunity and incentive to direct more of the "resource stream" (which they currently call a "waste stream") toward reuse, repair, or recycling. That in turn eliminates potential materials management job opportunities by the hundreds (compared to a few dozen jobs provided at the incinerator).

Proper materials management could reduce the trips of trucks hauling trash to a landfill to a number less than the trips currently hauling toxic incinerator ash to those landfills while also saving farmland from landfills.

For all of the above reasons plus even more left unstated, please vote against awarding renewable energy certificates to the Covanta Marion incinerator.

Footnotes:

1. https://www.oregon.gov/deq/aq/programs/Pages/GHG-Emissions.aspx (Click on 2018 - Greenhouse Gas Emissions From Facilities Holding Air Quality Permits) Reordering the list by "Total Emissions" from largest to smallest shows Covanta as 19th largest.
2. https://www.epa.gov/transforming-waste-tool
3. https://ilsr.org/rule/food-scrap-ban/vermont-organics-recovery/
4. https://zerowastemcminnville.org/
5. https://www.oregon.gov/deq/FilterDocs/MManagementOR.pdf
6. Highlighted values of highlighted pollutants in this table for the Covanta Marion incinerator would EXCEED **large new medical waste incinerator limits that are shown in the right hand column.** Those are the limits that SHOULD apply to the incinerator.

Pollutant	Covanta (OR Rules OAR 340 Division 230) Current Limits	2013 Emission Level from Testing	2014 Emission Level from Testing	2015 Emission Level from Testing	2016 Emission Level from Testing	2017 Emission Level from Testing	2018 Emission Level from Testing	2019 Emission Level from Testing	Large New Medical Waste Incinerator (40 CFR Part 60, Subpart Ec)
PM	25 mg/m^3	6.35 mg/m^3	8.45	5.87	2.81	3.31	16.55	1.69	18 mg/m^3
HCl (ppm)	29 ppm	10.73 ppm	18.36	13.37	6.00	7.83	9.26	11.90	**5.1 ppm**
SO_2 (ppm)	29 ppm	29 ppm	40	40	56	25	24	No data	**8.1 ppm**
CO (ppm)	100 ppm	98 ppm	94	75	89	76	98	No data	**11 ppm**
NO_x (ppm)	205 ppm	189 ppm	190	195	185	195	194	No data	**140 ppm**
Cadmium (mg/m^3)	0.020 mg/m^3	0.0002 mg/m^3	0.0015	0.0003	0.0005	0.0009	0.0026	0.0036	**0.00013 mg/m^3**
Lead (mg/m^3)	0.20 mg/m^3	0.0024 mg/m^3	0.0153	0.0014	0.0035	0.0040	0.0082	0.0017	**0.00069 mg/m^3**
Mercury (mg/m^3)	0.050 mg/m^3	0.0056 mg/m^3	0.0061	0.0016	0.0014	0.0030	0.0026	0.0036	**0.0013 mg/m^3**
Dioxin (ng/m^3)	15 ng/m^3	0.519 ng/m^3	0.372	0.525	0.832	0.400	5.76	2.35	9.3 ng/m^3

7. https://www.govinfo.gov/content/pkg/CFR-2015-title40-vol7/pdf/CFR-2015-title40-vol7-part60-subpartEc.pdf This shows large new medical waste incinerator emission rate limits from 40 CFR Part 60, Subpart Ec. See Table 1B at the bottom of page 314 and on page 315.