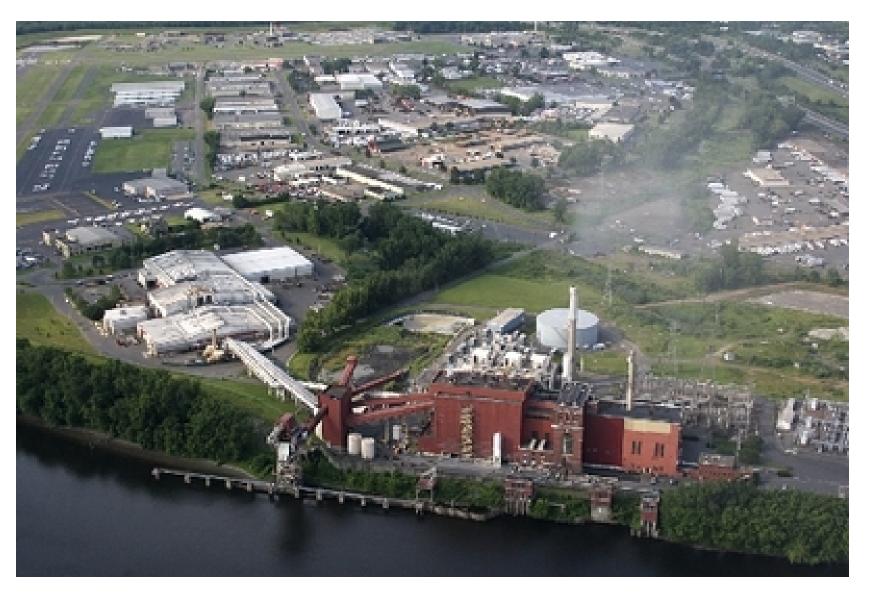
# Enerav Justice AM Network

## www.EnergyJustice.net

...helping communities protect themselves from polluting energy and waste technologies

## **Trash Incineration**

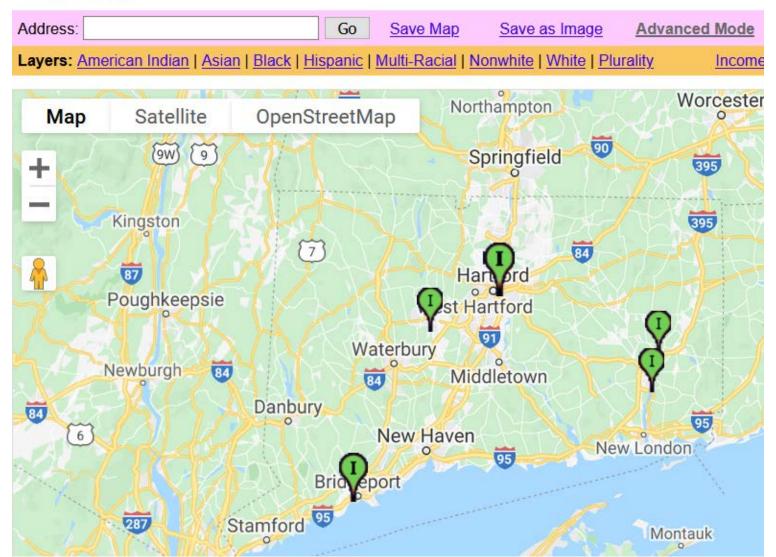


www.EnergyJustice.net/incineration/

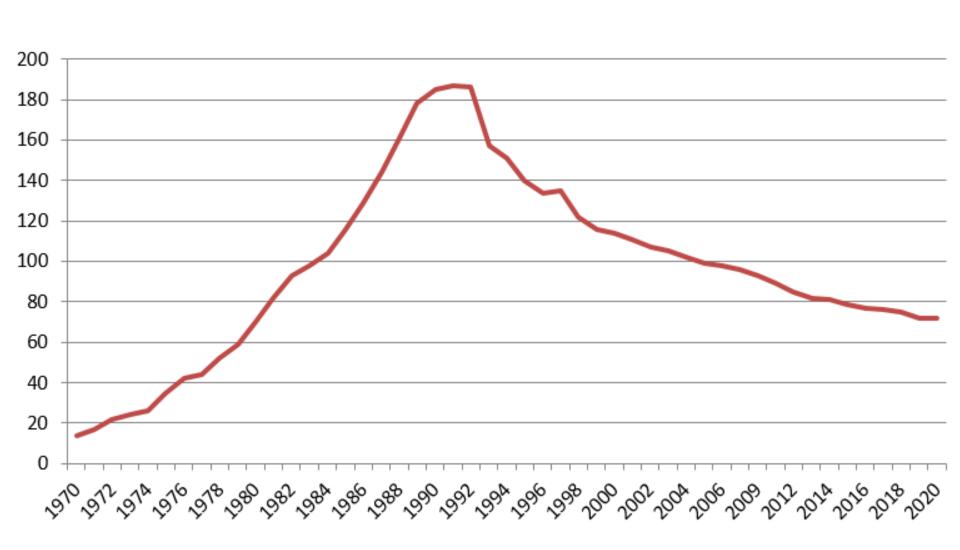


# Energy Justice Network Map BETA Home People - Groups - Facilities - Events - Resources - A

#### **State Map**



## Number of Commercial Operating Trash Incinerators in the U.S.





#### CRRA Connecticut Solid Waste Operations

#### **CRRA Connecticut Solid Waste System**



- Trash-to-energy plant, recyclables processing facility and CRRA Trash Museum in Hartford
- Transfer stations in Essex, Ellington, Torrington and Watertown
- Durham, Litchfield, Manchester, Middlefield, Naugatuck, Salisbury, Sharon, Simsbury and South Windsor deliver trash but not recyclables. Residents may participate in CRRA electronics-recycling and paper-shredding events.

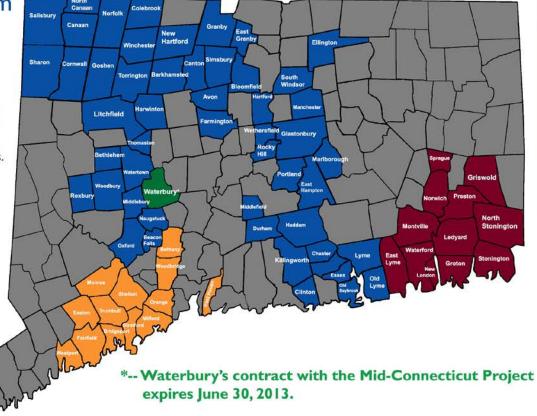
#### **CRRA Southwest Division**



- CRRA contracts for towns to deliver trash to Bridgeport trash-to-energy plant
- Recyclables delivered to transloading facility in Stratford and shipped to CRRA Hartford recycling processing center
- East Haven delivers recyclables but not trash; Bethany, Shelton and Trumbull deliver trash but not recyclables

#### **CRRA Southeast Project**

Trash-to-energy plant in Preston





#### Substitute Senate Bill No. 357

#### Public Act No. 14-94

AN ACT CONCERNING CONNECTICUT'S RECYCLING AND MATERIALS MANAGEMENT STRATEGY, THE UNDERGROUND DAMAGE PREVENTION PROGRAM AND REVISIONS TO ENERGY AND ENVIRONMENTAL STATUTES.

Be it enacted by the Senate and House of Representatives in General Assembly convened:

Section 1. (NEW) (Effective from passage) (a) There is established the Materials Innovation and Recycling Authority. The Materials Innovation and Recycling Authority shall constitute a successor authority to the Connecticut Resources Recovery Authority in accordance with the provisions of sections 4-38d, 4-38e and 4-39 of the general statutes.

The three proposals were...

- 1. Mustang Renewable Power Ventures: would have some recyclables removed from the trash, and the rest would be baled, shipped to be burned in LafargeHolcim's large and very polluting cement kiln in Ravena, NY
- 2. Covanta: would close the incinerator in Hartford, and ship waste to Covanta's incinerators in Bristol and Preston, CT. It would require a 4-fold expansion of their incinerator in Bristol, making the Bristol incinerator the second largest air polluter in Hartford County and one of the largest incinerators in the U.S.
- 3. Sacyr Rooney: to keep the incinerator in Hartford operating, where it would remain the second largest air polluter in Hartford County, even with their proposed emissions reductions.

## **Incinerator Life Spans**

- Average lifespan of the 44 trash incinerators that have closed from 2000 through 2020 was just **23 years**.
- Few trash incinerators operate beyond a 30-year life time.
- Only one made it past 40 without being completely rebuilt, and is having serious problems.
  - Rebuilding the Harrisburg, PA incinerator bankrupted the city.



### Moving from Incineration to Zero Waste

- Zero Waste Resolutions
- Waste Contracts
- Clean Air Ordinances
- State Policy

### Beating back false solutions

- Gasification, pyrolysis, plasma arc
- Waste-to-fuels (WTF?)
- Mixed waste processing, processed engineered fuel
- Anaerobic digestion

# World's largest waste corporation driving away from incineration





## THE WALL STREET JOURNAL.

Jan 3, 2014: "Big Waste Hauler Rethinks Startups"

[pulls out of gasification, pyrolysis, plasma and trash-to-ethanol investments, selling off Agilyx, Enerkem, Fulcrum, Genomatica & InEnTec]

#### Jul 29, 2014: "Waste Management to Sell Wheelabrator for \$1.94 Billion"

[pulls out of long-standing ownership of Wheelabrator, the second-largest operator of conventional incinerators in U.S.]

## EPA: "Non-Hazardous Secondary Materials" rule Waste is now "Fuel"

[Refuse-derived fuel (RDF) or "SpecFuel" or "Processed Engineered Fuel"]



#### **Emerging Threats**

#### Refuse-derived fuel (RDF)

(fuel pellets to burn in coal plants, cement kilns and other boilers)

- Processed Engineered Fuel
- SpecFuel

#### Waste to fuels

Trash to ethanol, methanol, jet fuel, naphtha, asphalt...

#### Two-stage incinerators

- Pyrolysis
- Gasification
- Plasma Arc

#### Anaerobic digestion

 Digestated trash marketed as burnable fuel, or as fertilizer or soil amendment; ok if just to pre-process before landfill



## Technologies and Risk

Source: Gershman, Brickner & Bratton, Inc. August 2012

Alternative	Risks/Liability	Risk Summary	
Mass Burn/WaterWall	Proven commercial technology	Very Low	
Mass Burn/Modular	Proven commercial technology	Low	
RDF/ Dedicated Boiler	Proven commercial technology	Low	
RDF/Fluid Bed	Proven technology; limited U.S. commercial experience	Moderate to Low	
Anaerobic Digestion	Proven technology; limited U.S. commercial experience	Moderate to Low	
Mixed-Waste Composting	Previous large failures; No large-scale commercially viable plants in operation; subject to scale-up issues	Moderate to high	
Pyrolysis	Previous failures at scale, uncertain commercial potential; no operating experience with large - scale operations	High	
Gasification Limited operating experience at only small scale; subject to scale-up issues		High	
Chemical Technology under development; not a commercial option at this time		High	



## Experimental Types of Incinerators Don't Work

#### Gasification, plasma arc and pyrolysis:

- Can't run continuously
- Can't be run effectively at commercial scale
- Can't process heterogenous feedstocks like trash
- Companies with no real history bamboozle local officials into subsidizing projects that fail, technically and financially
- The companies usually lie about their emissions, claiming zero emissions or "no smokestack"

# EPA says pyrolysis/gasification = incineration

#### 40 CFR 60.51a:

- Municipal waste combustor, MWC, or municipal waste combustor unit: (1) Means any setting or equipment that combusts solid, liquid, or gasified MSW including, but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved-air or excess-air), boilers (i.e., steam-generating units), furnaces (whether suspension-fired, grate-fired, mass-fired, air curtain incinerators, or fluidized bed-fired), and pyrolysis/combustion units.
- <u>Pyrolysis/combustion unit</u> means <u>a unit that produces gases</u>, liquids, or solids <u>through the heating of MSW, and the gases</u>, liquids, or solids produced <u>are combusted and emissions vented to the atmosphere</u>.

"A municipal waste incinerator 'combusts' solid waste and thus is functionally synonymous with municipal waste combustor."

(www.epa.gov/ttn/nsr/gen/rm\_2.html)

## Pyrolysis is a failed technology

#### Patent review company:

- has been seeing pyrolysis projects for 14 years
- none of them are legitimate
- they're just splitting combustion into two steps, making it more expensive, less efficient and not any cleaner
- sees a steady stream of guys in their 50s-70s who worked at corporations, thought it's a great idea, and go out and promote it and get money by whatever means and get some patent coverage mainly to help get the money, but none are legit

## Pyrolysis is a failed technology

- Not intended for continuous operation
  - Runs batch processes
  - Mainly used at demonstration scale
- Can only operate on homogenous fuels

#### **Environmental Protection Agency:**

 While technically feasible, tire pyrolysis – a process in which tires are subjected to heat in an oxygen-starved environment and converted to gas, oil and carbon char – has been inhibited by the high capital investment required and steep operating costs

## Landfilling vs. Incineration





## Landfilling vs. Incineration





...and Ash Landfilling

#### **Incineration Worse than Landfills**

- Incinerators still require landfills for their toxic ash
- Choice is NOT landfill vs. incinerator, but:

#### landfill

VS.

incinerator AND a smaller, more toxic landfill

**OR...** 

Zero Waste and minimal landfilling

## Landfilling vs. Incineration

			<b>Incinerators</b>
			are times
Pollutant (all data in tons)	<b>Incinerators</b>	Landfills	as polluting
Greenhouse Gases (CO <sub>2</sub> e)	482,770	268,763	<u>1.8</u>
Health Damaging Pollution	1,975	1,236	<u>1.6</u>
Carbon Monoxide (CO)	119	22	5
Hydrochloric Acid (HCl)	17	1	21
Nitrogen Oxides (NOx)	625	6	105
Particulate Matter (Condensable)	25	1	17
Particulate Matter (PM10)	26	17	1.6
Fine Particulate Matter (PM2.5)	17	4	5
Sulfur Oxides (SOx)	55	3	19
Total Suspended Particulate	2,178	2,486	0.88
Volatile Organic Compounds	3	9	0.34

Source: PA Dept of Environmental Protection Air Emissions Report, 2017 data for southeast & southcentral region facilities

## **How to Compare?**

- Human health impacts
  - Nitrogen Oxide emissions (asthma)
  - Particulate emissions
  - Toxic and Cancer-causing emissions
- Eutrophication
- Acidification (acid rain...)
- Ecosystem toxicity
- Ozone depletion
- Smog formation
- Global warming

Should also look at...

- Cost
- Jobs
- Population impacted
- Environmental justice



## Life Cycle Analysis on DC Waste Options

Analysis done by:

Jeffrey Morris, Ph.D. (Economics)

Sound Resource Management Group

360-867-1033

jeff.morris@zerowaste.com

www.zerowaste.com

Dr. Morris authored several peer reviewed published studies on waste systems.

#### LCA Characteristics of WARM, MSW DST and MEBCalc

	LCA Model		
		MSW	
Features	WARM	DST	MEBCalc
Impacts included in model			
-Climate change	<b>~</b>	<b>✓</b>	<b>~</b>
-Human health (respiratory)		limited	✓
-Human health (toxic chemicals)		limited	<b>✓</b>
-Human health (carcinogens)		limited	✓
-Eutrophication		limited	<b>✓</b>
-Acidification		limited	✓
-Eco-toxicity		limited	<b>✓</b>
-Ozone depletion			<b>✓</b>
-Smog formation		limited	<b>~</b>
Monetized Environmental Score			<b>~</b>
Energy Impacts Included	<b>✓</b>	<b>✓</b>	limited
# of MSW Materials Included	54	~30	27

Additional Comparison of WARM & MSW DST: H. Scott Matthews (Carnegie Mellon University), Cynthia J. Manson (Industrial Economics, Inc.), *Comparative Analysis of EPA Life Cycle Models: Differences between MSW-DST and WARM in Examining Waste Management Options*, prepared for EPA Office of Resource Conservation and Recovery, Internal Review Draft-Do Not Distribute, 11-12-2009.

#### **Data Sources**

#### • U.S. EPA

- National Emissions Inventory
- Emissions & Generation Resource Integrated Database (eGRID)
- FLIGHT (Greenhouse gas inventory)
- Landfill Methane Outreach Program database

#### • U.S. Energy Information Administration

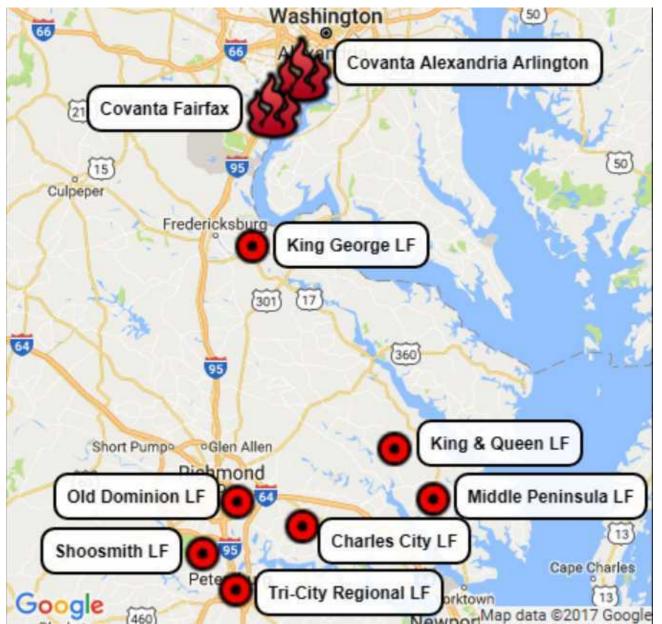
- Form 860 database (Annual Electric Generator data)
- Form 923 database (Annual Electric Utility Data)
- Virginia Department of Environmental Quality
- DC Department of Public Works
- Energy Recovery Council
- Sound Resource Management Group



## Where DC's waste went (to VA) in 2016:

Covanta Fairfax	222,937	27%
Shoosmith Sanitary Landfill	221,415	27%
Middle Peninsula Landfill and Recycling Facility	190,323	23%
BFI Old Dominion Landfill	118,785	14%
Tri City Regional Disposal and Recycling Services	36,898	4%
King George Landfill & Recycling Center	20,002	2%
Covanta Alexandria Arlington	16,690	2%
King and Queen Sanitary Landfill	267	0%
Charles City County Landfill	18	0%
Total:	827,335	

## Where DC's waste went (to VA) in 2016:



## Facilities in Focus for 2017 & This Presentation

Facility Name	Туре	Average Distance from DC Transfer Stations (mi)	Annual Precipitation (inches)	Years of Life Remaining
Covanta Fairfax	Incinerator	20	6	13 (if it lives to 40)
King George	Landfill	6	3 42.8	3 11
King & Queen	Landfill	122	2 45.4	26
Middle Peninsula	Landfill	130	O 45.4	73
Charles City	Landfill	130	46.3	74

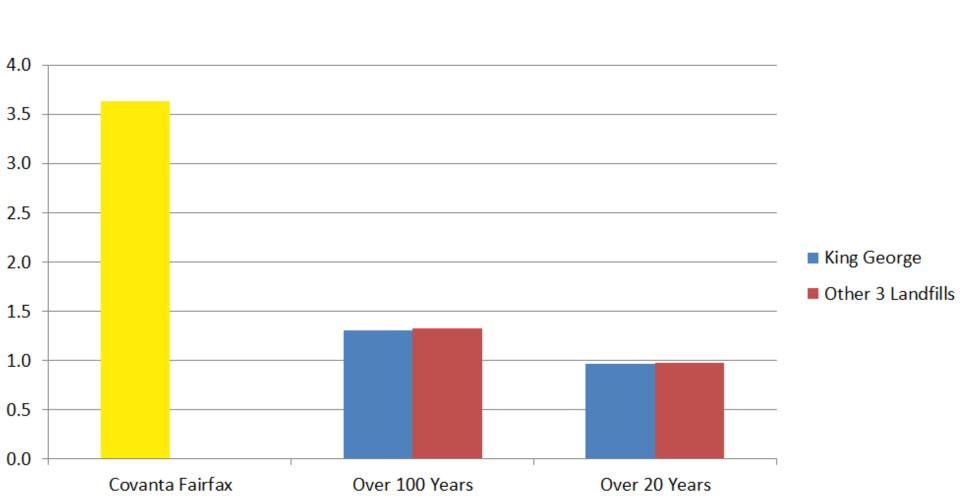
["Other 3 Landfills" in future slides refers to the last three above, which are all about the same distance from DC.]

## Covanta Fairfax Reported Emissions (2014)

Global Warming Pollutants	Pounds released (2014)
Carbon Dioxide (CO2)	2,169,540,876
Methane (CH4)	762,927
Nitrous Oxide (N2O)	100,130
Health Damaging Pollutants	Pounds released (2014)
Carbon Monoxide	11,319
Hydrochloric Acid	57,408
Hydrofluoric Acid	1,385
Lead	68
Nitrogen Oxides (NOx)	3,398,301
Particulate Matter (PM10)	14,709
Fine Particulate Matter (PM2.5)	8,862
Sulfur Dioxide	257,899
Volatile Organic Compounds	11,813

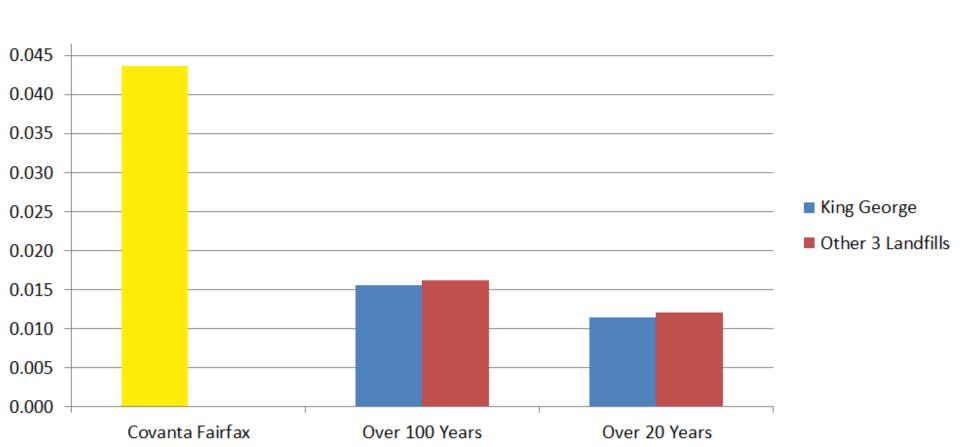
## Nitrogen Oxide (NOx) Pollution

[Pounds of NOx per ton of waste disposed.]



### **Particulate Matter Pollution**

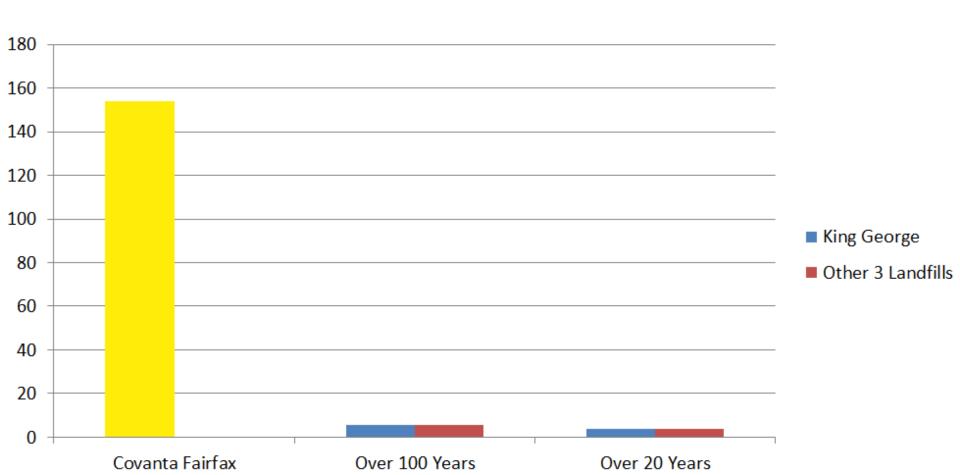
[Pounds of PM2.5 equivalent per ton of waste disposed.]



### **Toxic Pollution**

[Pounds of toluene equivalent per ton of waste disposed.]

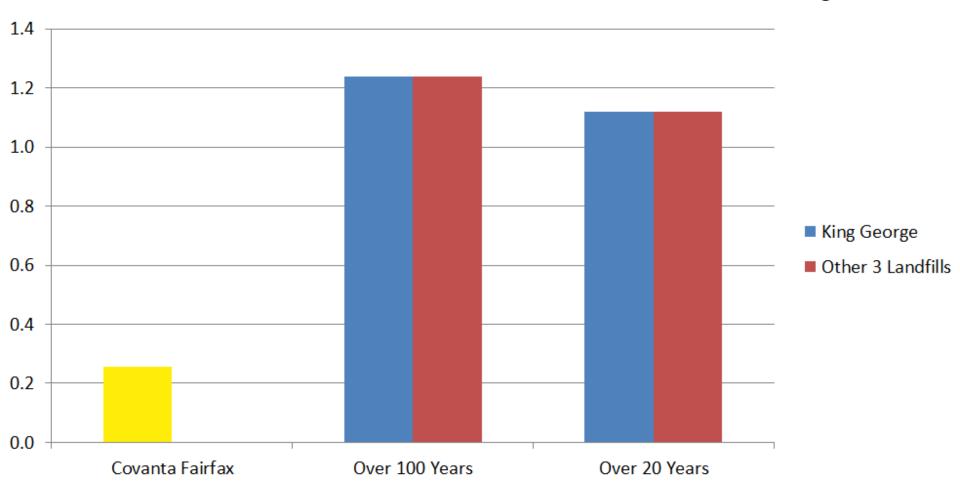
Does not include dioxin/furan emissions or ash leaching.



## **Carcinogenic Pollution**

[Pounds of benzene equivalent per ton of waste disposed.]

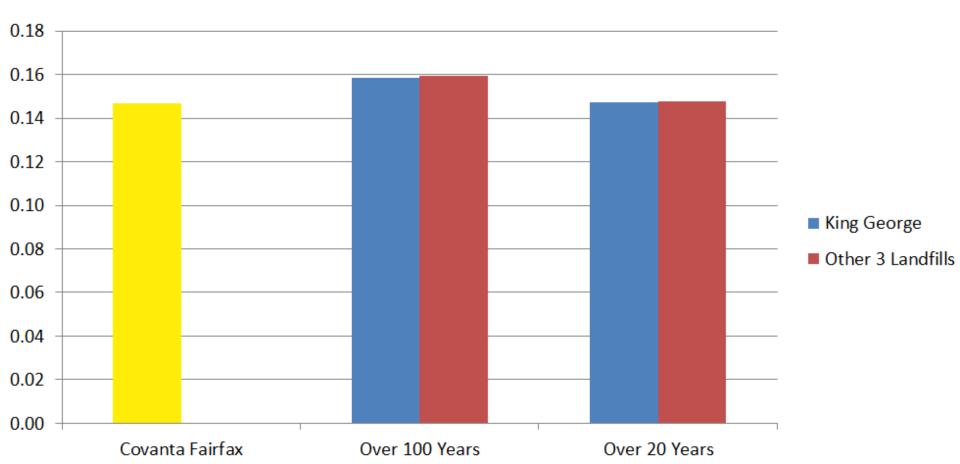
Does not include dioxin/furan emissions or ash leaching.



## **Eutrophication**

[Pounds of nitrogen equivalent per ton of waste disposed.]

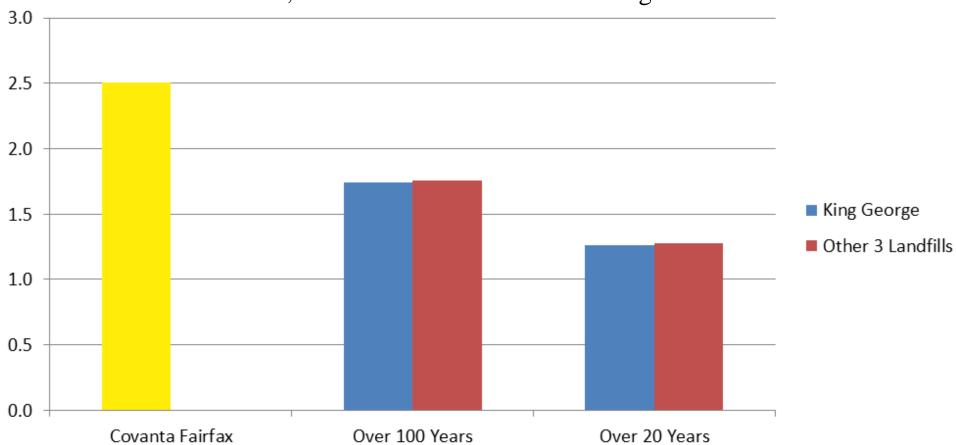
NOx and ammonia air emissions plus BOD, COD, phosphate, and ammonia water releases from landfills.



### **Acidification**

[Pounds of SO<sub>2</sub> equivalent per ton of waste disposed.]

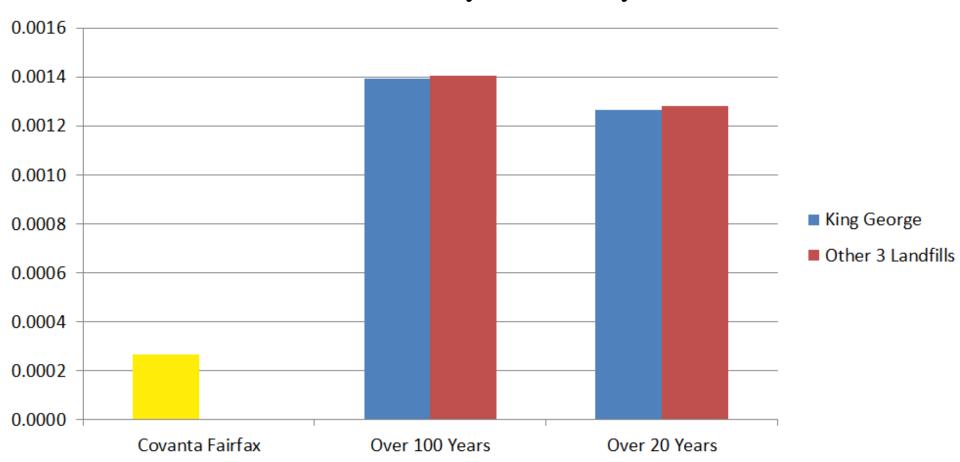
Incinerator emissions are largely from nitrogen oxides, but also include other acid gases (SO<sub>2</sub>, HCl, HF). For the landfills, it's hydrogen sulfide (H<sub>2</sub>S) from the landfill, plus ammonia, NOx and SOx from the landfill gas burners.



## **Ecosystems Toxicity**

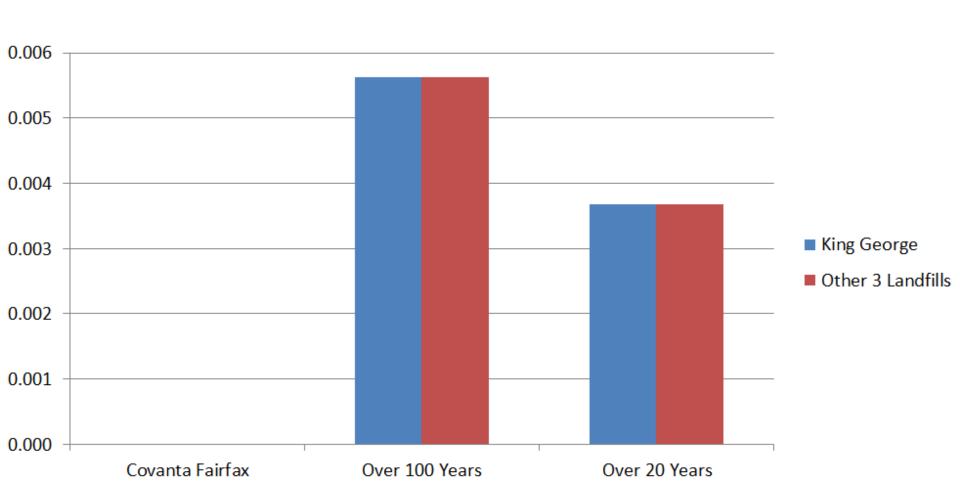
[Pounds of 2,4-D herbicide equivalent per ton of waste disposed.]

For the incinerator, this is mainly based on mercury emissions. For the landfill, mainly formaldehyde.



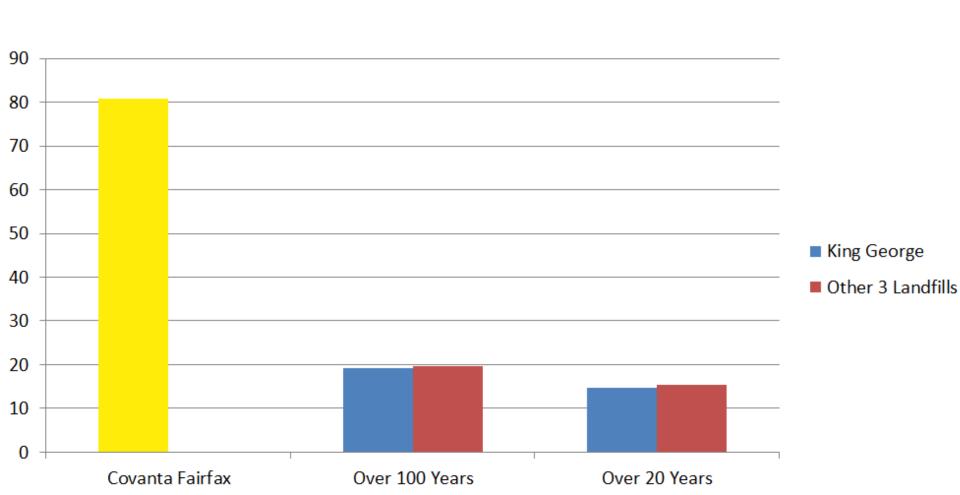
# **Ozone Depletion**

[Pounds of CFC-11 equivalent per ton of waste disposed.]



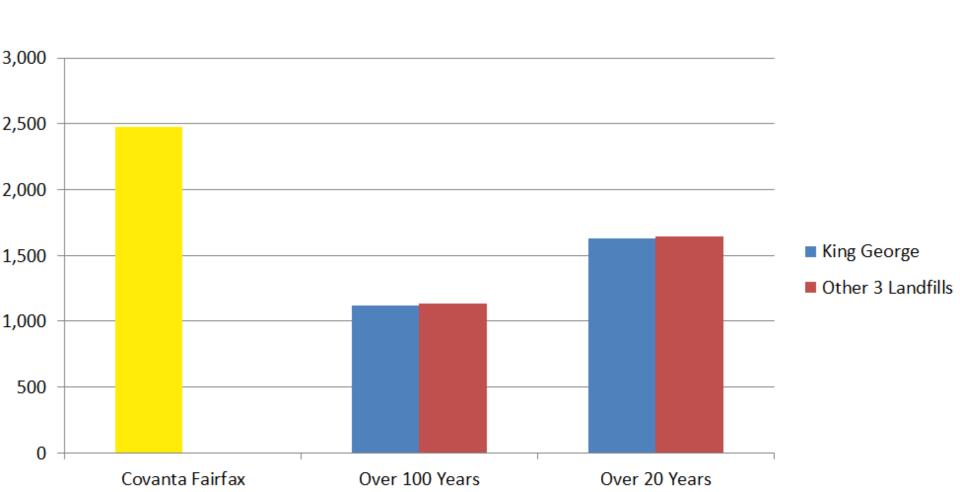
## **Smog Formation**

[Pounds of ozone (O<sub>3</sub>) equivalent per ton of waste disposed.]

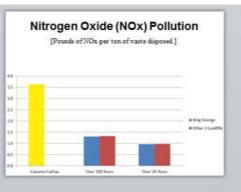


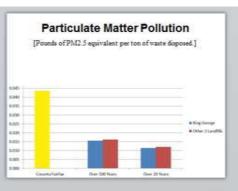
## **Global Warming Pollution**

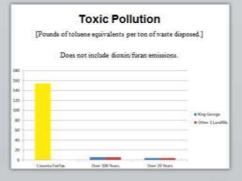
[Pounds of CO<sub>2</sub> equivalent per ton of waste disposed.]

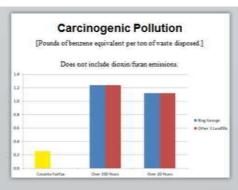


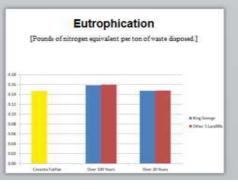
### Incineration worse than Landfills

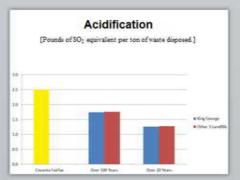


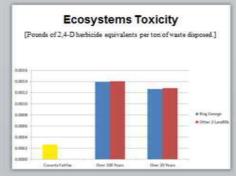


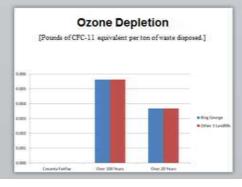


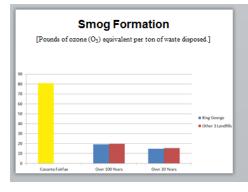


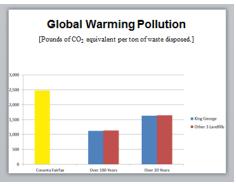








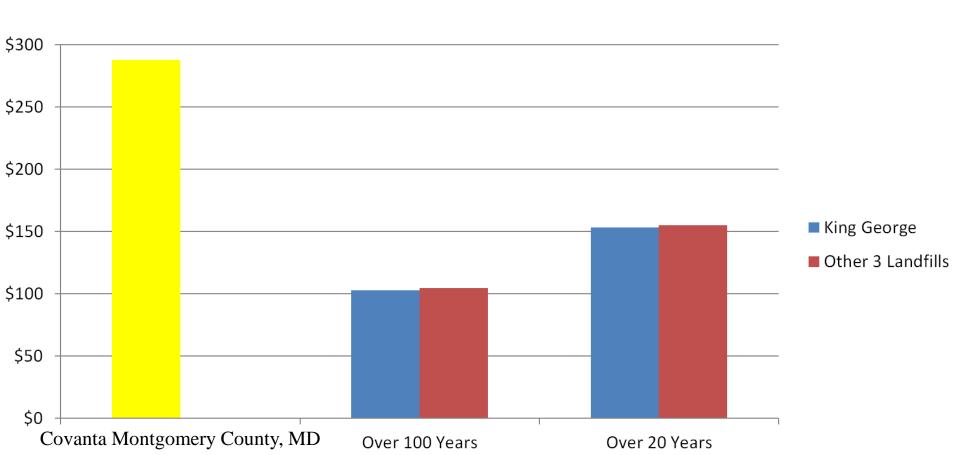




# All together now... Monetized Health & Environmental Cost

[All impacts combined and monetized.]

\$288/ton for incineration vs. \$103-155/ton for landfilling.



# Trash Incineration (with ash landfilling) is Worse than Landfills

#### Incineration is worse for:

- Global warming
- Toxic emissions
- Nitrogen Oxide emissions (asthma)
- Particulate Matter emissions
- Acid rain
- Smog
- Cost
- Number of people impacted
- Environmental racism
- Jobs

### Landfills are worse for:

- Ozone depletion
- Carcinogenic emissions
- Pesticide-like chemicals

### **Health effects**

People living near incinerators have an increased risk of...

- All types of cancer, including:
  - Stomach
  - Colorectal
  - Liver
  - Renal
  - Lung & pleural
  - Gallbladder
  - Bladder
  - Non-Hodgkin lymphoma
  - Leukemia
  - Soft-tissue sarcoma
- Respiratory diseases & symptoms
- Cardiovascular diseases
- Urinary diseases



#### Hartford County's largest air polluters

(2014 U.S. EPA National Emissions Inventory)

	Pounds of Air Pollution (2014)		
Facility			
Bradley Intl Airport	2,703,413.5		
CRRA/Mid-Connecticut	2,476,912.3		
M D C /Hartford WPCF	754,769.1		
Covanta Bristol, Inc	683,080.6		
[61 other smaller sources]	1,739,338.1		
TOTAL	8,357,513.5		

Note that a modest expansion in capacity at the Covanta Bristol trash incinerator would cause it to overtake the sewage sludge incinerator at the Hartford Water Pollution Control Facility as the third largest air polluter in the county. If this were coupled with the closure of the Mid-Connecticut trash incinerator in Hartford, the Bristol incinerator becomes the county's second largest air polluter.

### New London County's largest air polluters

(2014 U.S. EPA National Emissions Inventory)

	Pounds of Air		
Facility	Pollution (2014)		
Covanta Southeastern Ct Co	1,110,072.6		
Wheelabrator Lisbon Inc (WM)	716,123.9		
[25 other smaller sources]	2,017,809.5		
TOTAL:	3.844.006.0		

# Top 10 Greenhouse Gas Emitters in Connecticut (trash incinerators in **bold**)

			GHGs (Metric
City	County	St	Tons CO2e)
Dayville	Windham	CT	2,140,048
Middletown	Middlesex	CT	1,546,073
Bridgeport	Fairfield	CT	1,401,437
Milford	New Haven	CT	1,235,164
Bridgeport	Fairfield	CT	802,396
Hartford	Hartford	CT	751,271
Preston	<b>New London</b>	CT	259,655
Bridgeport	Fairfield	CT	221,542
Lisbon	<b>New London</b>	CT	196,085
Bristol	Hartford	CT	192,679
	Dayville Middletown Bridgeport Milford Bridgeport Hartford Preston Bridgeport Lisbon	Dayville Windham Middletown Middlesex Bridgeport Fairfield Milford New Haven Bridgeport Fairfield Hartford Hartford Preston New London Bridgeport Fairfield Lisbon New London	Dayville Windham CT Middletown Middlesex CT Bridgeport Fairfield CT Milford New Haven CT Bridgeport Fairfield CT Hartford Hartford CT Preston New London CT Bridgeport Fairfield CT Bridgeport Fairfield CT New London CT Lisbon New London CT

Note: this is based on 2016 EPA FLIGHT data, with the 2014 eGRID values for unadjusted CO2 emissions for incinerators, so that all actual CO2 emissions are counted. Adjusting values to reflect a slight reduction in waste burned in 2016 vs. 2014 does not change these ranks at all.

## Zero Waste Jobs



Deconstruction Crew, Second Chance, Baltimore, MD. Photo Credit: C. Seldman

### What is Zero Waste?

"The conservation of all resources by means of responsible production, consumption, reuse, and recovery of all products, packaging, and materials, without burning them, and without discharges to land, water, or air that threaten the environment or human health."

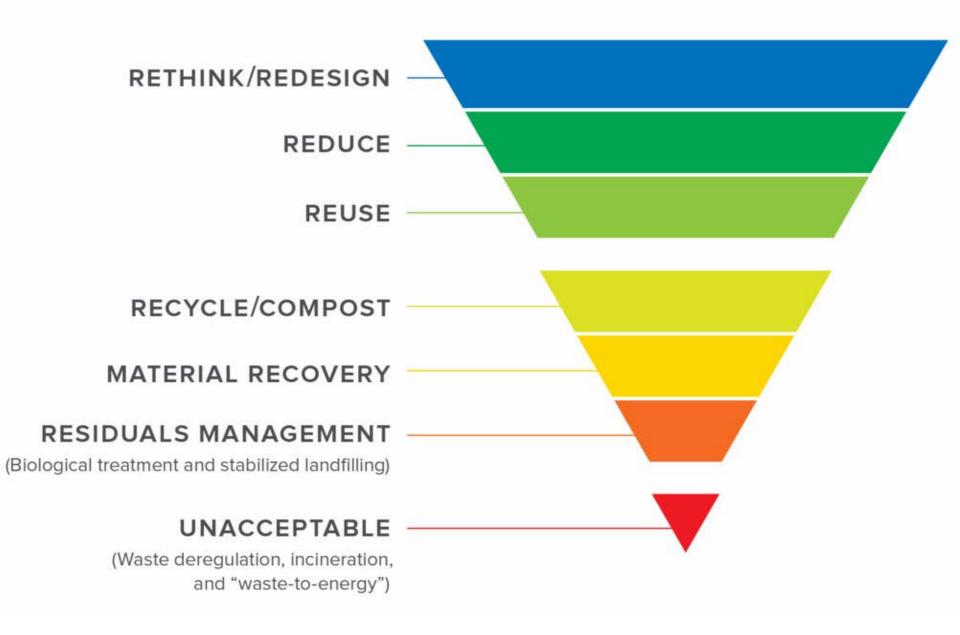
# If you're not for Zero Waste, how much waste are you for?

Zero Waste means ZERO incineration and at least 90% diversion from landfills and other forms of destructive disposal.

The goal is to get as close to zero as possible, without getting caught up on the impossibility of actually hitting zero.

"Zero waste" is like "zero drug tolerance" or "zero accidents in the workplace" standards. Zero is the goal, and the right policies will get you as close as you can get.

#### THE ZERO WASTE HIERARCHY



## **Zero Waste Hierarchy**

- Rethink / Redesign
- Reduce
- Source Separate:
  - Reusables
  - Recycle (multi-stream)
  - Compost
  - Waste
    - Research to see what is left, and encourage redesign
    - **Recovery**: mechanically remove additional recyclables
    - Anaerobically digest, then aerobically compost residuals
    - Stabilized (digested) residuals to landfill

### www.energyjustice.net/zerowaste

# What is the best disposal option for the "Leftovers" on the way to Zero Waste?

By

Dr. Jeffrey Morris

Dr. Enzo Favoino

Eric Lombardi

Kate Bailey



www.ecocycle.org/specialreports/leftovers

## The back end is still a landfill...

## 1. Direct landfilling

(bad, but better than incineration)

- leachate (toxics)
- air emissions (toxics, methane, odors)

# 2. Incineration → toxic ash to landfill (most polluting and expensive option)

- leachate (even more toxics)
- air emissions from ash blowing off site (toxics)

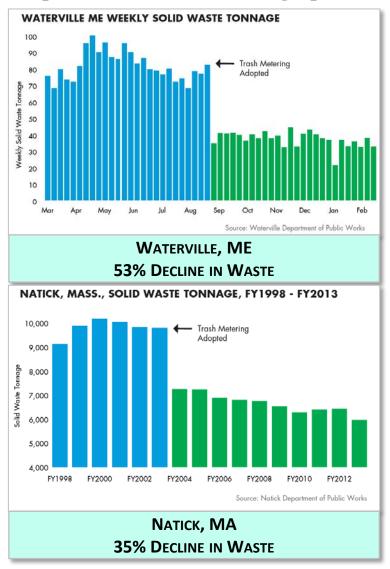
# 3. <u>Anaerobic digestion → landfill</u> (best option; avoids gassy, stinky landfills)

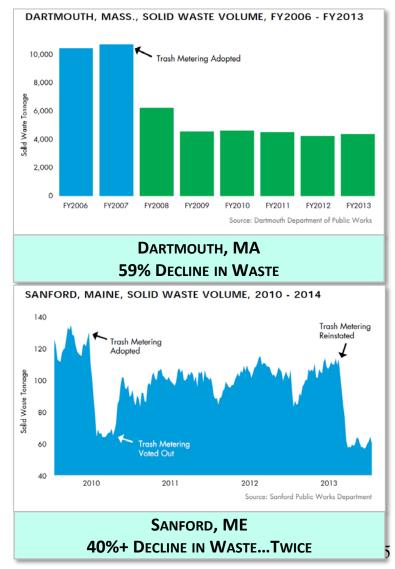
odor, leachate and air emissions highly minimized



### **Results: MSW Reduction of 44% on Average**

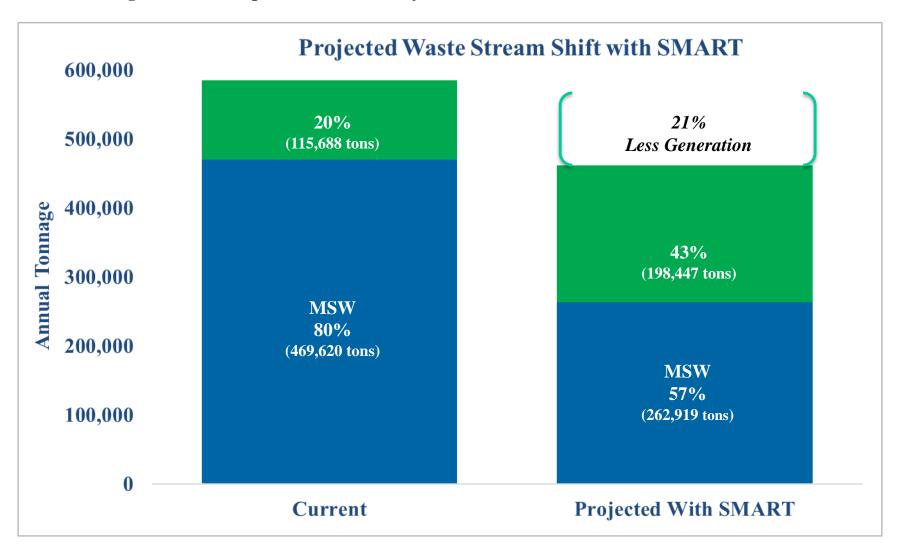
SMART / 'Unit Based Pricing' is a science. The data spans over decades across hundreds of municipalities with diverse demographics.





### Expected Waste Shift from SMART (40 DEEP Dive Participants)

Overall waste generation is expected to decrease by about 21% due to source reduction and reuse.

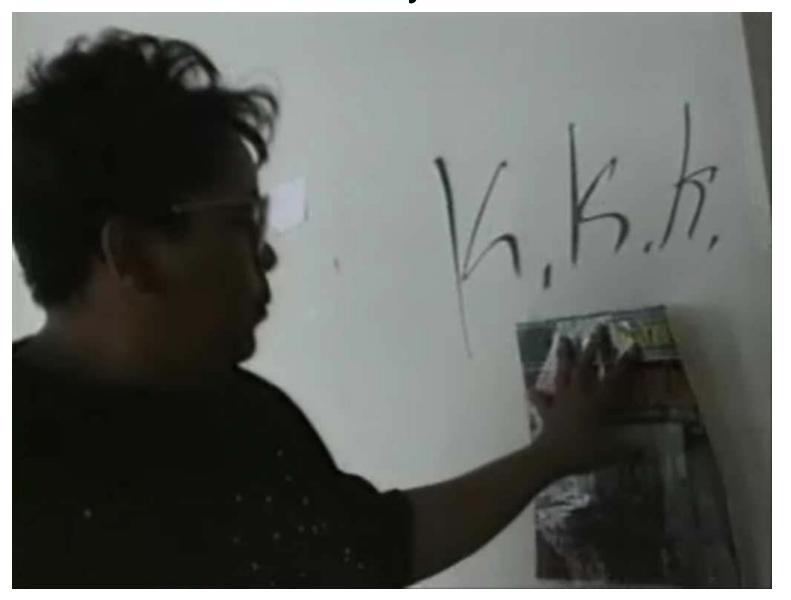


## What is Environmental Racism?

- Communities of color are more heavily targeted for hazardous industries than poor communities are.
- Doesn't need to be intentional to have a discriminatory effect



### Racism isn't usually this obvious...



Zulene Mayfield shows signs of vandalism at office of Chester Residents Concerned for Quality Living in Chester, PA in 1996 "Laid to Waste" documentary.

## 1984: Cerrell Associates Report

(Trash incinerators in CA)

### LEAST LIKELY TO RESIST

Southern, Midwestern communities
Rural communities
Open to promises of economic

Open to promises of economic benefits

Conservative, Republican, Free-Market

Above Middle Age

High school or less education

Low income

Catholics

Not involved in social issues

Old-time residents (20 years+)

"Nature exploitive occupations"

(farming, ranching, mining)

### **MOST LIKELY TO RESIST**

Northeastern, western, California Urban communities

Don't care or benefits are minor Liberal, Democrat, "Welfare State"

Young and middle-aged

College-educated

Middle and upper income

Other

Activist

Residents for 5-26 years

Professional ("YUPPIES" &

"housewives")

## www.ejnet.org/ej/cerrell.pdf

### What is Environmental Justice?

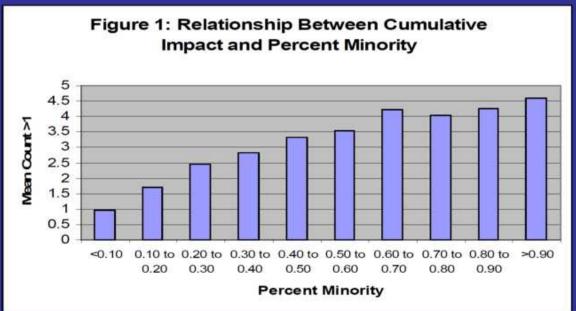
• Environmental Justice is the movement's response to environmental racism

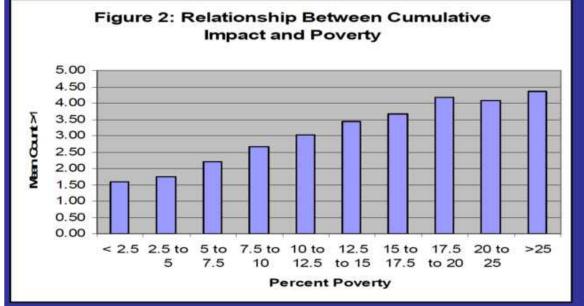
• Principles of Environmental Justice developed at the First National People of Color Environmental Leadership Summit in 1991

Defined by the movement, not by EPA

www.ejnet.org/ej/

#### Relationship between Cumulative Impact and Social/Economic Indicators





- Grouped all block groups based on percent minority and poverty
- Calculated average cumulative impact score for combined groups
- Cumulative impact scores increase steadily with increasing percent minority and poverty

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## Trash Incineration and EJ in CT

Hartford & Bridgeport incinerators account for 76% of the trash incineration capacity in the state.

Wheelabrator Lisbon - 500 tons/day

80-90% white; higher income; 6,828 people living within 2.5 miles

Southeastern Connecticut Resource Recovery (Covanta) - 669 tons/day

70-90% white; higher income; 4,391 people living within 2.5 miles

Bristol Resource Recovery Facility (Covanta) - 650 tons/day

80% white; slightly higher income; 15,000 people living within 2.5 miles

Wheelabrator Bridgeport - 2,250 tons/day

Black/Latino; very low income; 58,000 people living within 2.5 miles

Mid-Connecticut Resource Recovery Facility (MIRA) in Hartford - 2,850

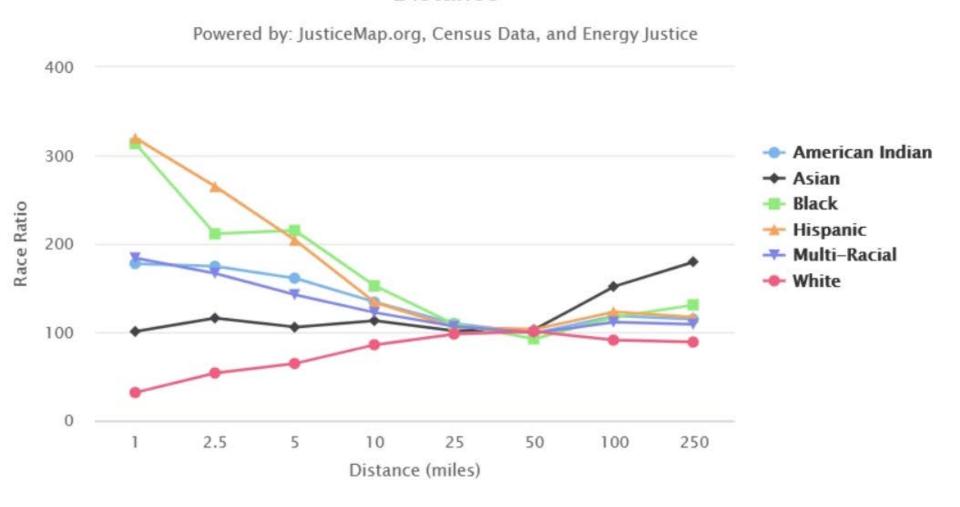
tons/day

Black/Latino; very low income; 47,000 people living within 2.5 miles

## Trash Incineration and EJ in CT

Connecticut Trash Incinerators : Ratio of Percent Race to CT Mean vs Distance



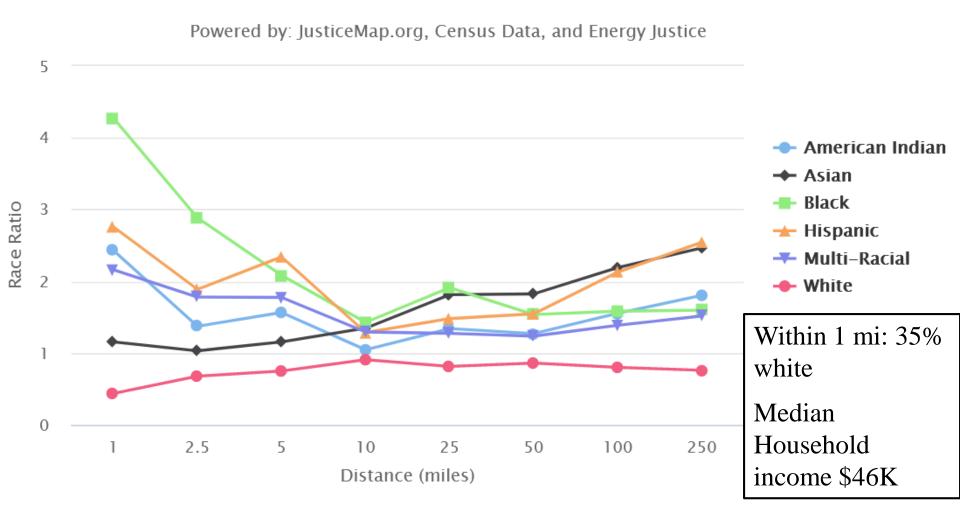


http://www.spatialjusticetest.org/test/1703.html

## Trash Incineration and EJ in PA

Operating Trash Incinerator : Ratio of Percent Race to PA Mean vs Distance



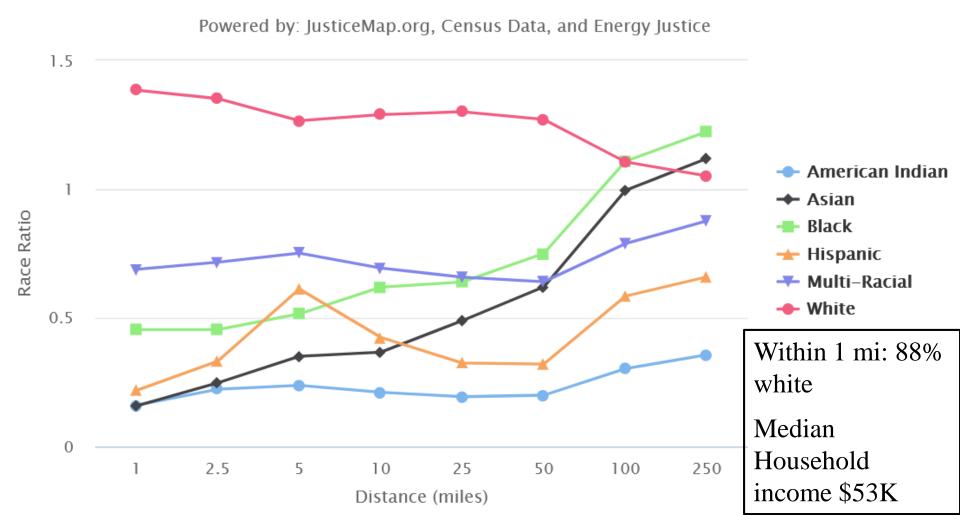


http://www.spatialjusticetest.org/test/2044.html

## Landfills and EJ in PA

Ratio of Percent Race to US Mean vs Distance

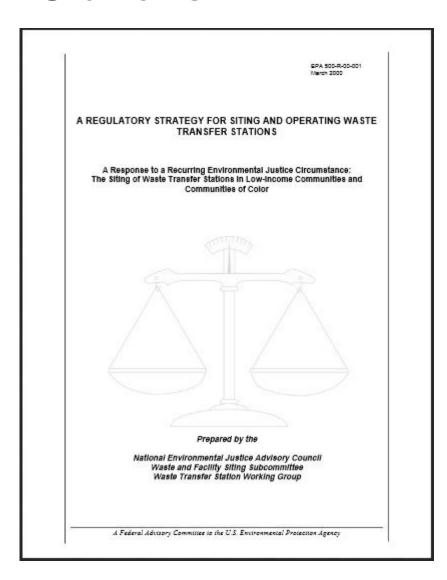




http://www.spatialjusticetest.org/test/2043.html

### **Trash Transfer Stations**

In 2000, the EPA's National Environmental Justice Advisory Council noted that waste transfer stations "are disproportionately clustered in low-income communities and communities of color."



### **Trash Transfer Stations**

In addition to nuisances like odors, "vectors" (seagulls, rats), and trucks (and their diesel exhaust), transfer stations are also a source of airborne mercury pollution from sources such as broken fluorescent bulbs.

#### TECHNICAL PAPER

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Airborne Emissions of Mercury from Municipal Solid Waste. II: Potential Losses of Airborne Mercury before Landfill

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Source: www.energyjustice.net/files/lfg/mercury/2005jawma2.pdf



# www.EnergyJustice.net

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