



LUKE BRONIN
MAYOR

CITY OF HARTFORD
ADVISORY COMMISSION ON THE
ENVIRONMENT
HARTFORD, CONNECTICUT 06103
WWW.HARTFORD.GOV



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Commissioners

Chair:

Mark Mitchell, MD, MPH

Secretary

June O'Neil

Members :

JoAnne Bauer

Russell Williams

Staff:

Shubhada Kambli

Peggy Diaz, Esq.
CT Department of Environmental Protection
79 Elm Street
Hartford, CT 06106

**RE: PUBLIC COMMENTS ON DEEP'S RESOURCE REDISCOVERY RFP PHASE II
ON MODERNIZING THE CT SOLID WASTE MANAGEMENT PROJECT**

Dear Attny. Diaz:

On behalf of the Hartford Advisory Commission on the Environment (ACOTE), I am pleased to submit for the record comments on the proposals submitted in response to the DEEP RFP referenced above.

Context

- Environmental racism refers to the fact that environmental hazards are disproportionately located in low-income communities, and even more so, communities of color. Several studies have shown that in Connecticut, the greatest predictor of where solid waste facilities are located in the state is the percentage of African American and Latino residents located in a community.
- Connecticut burns a larger percent of its MSW that is not recycled than any other state in the nation. The largest permitted trash incinerator in Connecticut is in Hartford, the city with the largest percentage of Black and Latino residents, at 82%. Hartford also has the highest poverty rate in the state.
- In addition to the trash incinerator that accepts garbage from 50 towns (down from 77), Hartford hosts the following regional waste facilities:
 - The state's largest sewage treatment plant, which accepts sewage from 8 towns, is now doubling in capacity and is a significant source of odors
 - The state's largest sewage sludge incinerator, which is operated by MIRA and accepts sludge from about 30 towns, is a major source of mercury and dioxin in the air, as well as odors
 - The North Hartford landfill, which was previously operated by MIRA/CRRA and accepted MSW and ash from the above

facilities from over 100 towns. It is now closed, but continues to produce gases, is an eyesore, needs to be managed, and has not been put into productive post-closure use.

- The two largest capacity recycling volume reduction facilities in the state, operated by MIRA and All Waste. They contribute to the pollution from truck traffic in Hartford
- A hazardous waste transfer facility, which brings hazardous waste to Hartford from surrounding towns and risks hazardous exposures
- A medical waste transfer facility, which was approved by exemption despite zoning laws banning them and community opposition
- 300 to 500 diesel trucks that bring waste and recycling to Hartford each day, contributing to air pollution, water pollution, and cost of maintenance of Hartford roads and other infrastructure. These also contribute to cancer and respiratory conditions.

Comments

Hartford residents are primarily concerned about the human health effects and environmental problems potentially contributed by these facilities. We are also concerned about safety, jobs to Hartford residents, quality of life impacts, equity concerns, and aesthetics.

- Burning of trash releases toxics into the air, including lead, mercury, nickel, dioxins, and phthalates, which are associated with asthma, cancers, learning disabilities, obesity, and diabetes. Hartford has some of the highest rates of these conditions of any town in the state. A peer-reviewed scientific article links emissions from the Hartford trash incinerator to health effects in Hartford residents.¹
- Contrary to the implications from DEEP presentations, even though ACOTE and Dr. Mitchell have spent many hours trying to understand and provide free advice on the community concerns on waste facilities in Hartford, we have not said that we will support any new waste facility proposed to be built in Hartford. The advice we give is our opinion of the harmful effects from the proposed facilities and community concerns about these facilities.

Principles

- Just because Hartford has been victimized by environmental racism in the past does not mean that we will accept even a little more in the future. On the contrary, we will oppose any proposal that is not superior in terms of health improvements, safety, economics and

other benefits to any proposal that would be accepted in a wealthy suburb. We need environmental justice.

- Paying taxes is not a community benefit—and neither is the \$4 million Payment in Lieu of Taxes (PILOT) to the City of Hartford that is required in the responses to the CT DEEP Request for Proposal. These are to pay for City services such as police, fire, road and sidewalk repair, since MIRA is exempt from property and personal property taxes that other businesses and residents have to pay. The trash incinerator has used more City services than virtually any other business in Hartford. They have had as many as 100 reported fire calls in one year for explosions, fires, and false alarms—far more than any other business. Hartford taxpayers have to pay for these services.
- PILOT payments of \$4 million, which are required in the DEEP RFP are low. CRRRA/MIRA recently paid \$4.5 million annually. They said that that was about what they would pay if they were taxed like other businesses. This amount was lowered to \$1.5 million in recent years due to MIRA's financial situation. It would be much more beneficial for the City if the facility were closed and the land developed for commercial purposes.
- In addition to the \$4 million PILOT payment, if Hartford continues to accept waste from other towns, the operator of these waste facilities should provide between \$2 million and \$5 million in host community environmental benefits to City residents, as negotiated by the applicant and the Hartford mayor, Hartford Advisory Commission on the Environment, Connecticut Coalition for Environmental Justice, and Hartford 2000. The amount should be calculated on a graduated scale per ton of waste dependent on how much MSW is brought to the City and how much of a potential risk to health, safety and welfare the facilities provide. The differentials in environmental payments should be enough to serve as an incentive to reduce the amounts and toxicity of waste released into the air, water, and land of one of the most vulnerable populations in CT.
- Environmental benefit payments should be used for the establishment of a fund to pay for grassroots community-based organizing, peer-to-peer environmental education, and civic engagement. Community members need to know enough about proposed projects that have potential environmental health effects so that they can provide meaningful input. Nonprofit organizations are best able to reach those who are most affected to educate them on environmental issues such as recycling, composting, and energy use in a way that makes it relevant to their lives.
- Once the finalist is selected, we would like for that company to provide a grant of \$25,000 to the Connecticut Coalition for Environmental Justice or similar community organization to educate community residents about the proposal and options in order to

increase the likelihood that the community can speak in one voice in providing meaningful input into the decision-making process.

- Creation of Hartford resident owned waste diversion businesses/joint ventures would be very beneficial and could garner community support for a project that incorporated this as a significant component of their proposal.
- MIRA should not be privatized. One of the proposed developers suggests that MIRA should be eliminated and that waste disposal and diversion be turned over to the private sector. In our experience, private companies are much more opaque in their operations, and less responsive to operational, health and equity concerns of local residents than governmental or quasi-governmental entities.

Comments on Proposals

The Hartford Advisory Commission on the Environment believes that:

- The Hartford trash incinerator should be abandoned because of its health effects on one of the most vulnerable population in CT. Sacyr Rooney's proposal is the only one that suggests rebuilding the trash incinerator in Hartford, albeit at half the capacity of the current one. This has generated substantial community opposition, and we anticipate growing opposition to this. They also propose additional sorting of the MSW into components that can be recycled, sent to anaerobic digesters, and to composting. However, very little of the compostable materials will actually be composted. Most will be sent to the incinerator instead. This is unacceptable. The only saving grace is that they propose to reduce the toxic emissions from the stack by removing PVC and other chlorine products that produce dioxins when incinerated, but this does not alleviate the health risks of incineration.
- Removing toxics from the waste stream is important to reducing human and animal exposure to toxics in air, water, and composts, which contribute to disease. Lead, mercury, and nickel, as well as chlorine and phthalates in plastics should be removed from the waste stream as much as possible. Aggressive promotion of household hazardous waste collections, as well as plastic bag collections would be useful, and may make the compost more marketable. Sacyr Rooney proposes plastic bag/film recycling.
- Curbside collection of compostables (organics), as is proposed by Covanta is a real plus. It virtually eliminates contamination of compost with heavy metals such as lead, so that it can be sold to grow food in farms and gardens. This has contributed greatly to the 80% diversion rates achieved in San Francisco and Tokyo. In 1999, the Hartford MDC's sewage sludge compost facility burned to the ground

over 7 days due to MDC's inability to market its contaminated compost, which was piled up and therefore combusted spontaneously. That must not happen again. Clean compost is very marketable and should not need to be left unmanaged for long periods of time while looking for new markets.

- In addition to closing the incinerator and trash processing facility that is adjacent to it, Covanta proposes to close the recycling facility and to convert it into a transfer station. The State/MIRA would have to decide what to do with the unused land. It could potentially be used for commercial development and returned to taxable use.
- Covanta proposes to reduce the amount of MSW sent to Hartford by up to half, by increasing composting and processing MSW at the other transfer stations and sending it to various other composting, recycling and MSW facilities. This is a real benefit to Hartford and is much more equitable. It would also serve to incentivize increasing recycling/diversion rates to meet state goals of 60% diversion. It is the only proposal that is not seeking to increase the amount of MSW that it will handle in the longer term. Covanta presents the option of expanding its Bristol facility, which has one-third the capacity as the current Hartford facility. We do not support that expansion.
- Mustang proposes to close the Hartford incinerator and replace it with a much more robust separation of the MSW into a number of usable waste streams including recyclables, compostables, and organics for anaerobic digestion. They propose to invest in many different technologies to create several usable final products such as compost for non-food agriculture (due to its contamination), recyclables, and natural gas fueling stations. In our experience, the more complex the systems, the greater the chance that things will go wrong and the larger the volume of waste handled, the worse the effects of these failures due to the inability to store/handle/divert the amount of waste coming in that can no longer be processed. Operational failures of anaerobic digestion, and to a lesser extent, composting, lead to horrendous odors, especially in large facilities. However, because of the array of technologies and partners proposed, Mustang may have more backup options to handle the build ups of inputs or outputs of failed systems than most companies do. They may also have the ability/capacity to create more Hartford resident-owned businesses.

Conclusion

The Hartford Advisory Commission on the Environment recognizes that Hartford is arguably home to the most vulnerable people in Connecticut and that we have borne the brunt of environmental racism for far too long. The greatest and most visible source of that environmental racism has been the

trash incinerator and North Hartford landfill, both operated by MIRA and its predecessor, CRRA. These facilities have harmed our health, welfare and even our lives so that 100 other Connecticut towns did not have to be responsible for their own wastes.

ACOTE and many other Hartford residents are primarily concerned about the human health effects and environmental problems potentially contributed by the multiple regional waste facilities that have been located in the City of Hartford. We are also concerned about safety, jobs to Hartford residents, quality of life impacts, equity concerns, and aesthetics.

Because of this, we oppose the continued operation or rebuilding of the trash incinerator in Hartford, therefore we oppose the proposal by Sacyr Rooney to rebuild this facility. This does not mean that we support the other two proposals—we do not. We do note that the Covanta proposal is more equitable than the others and the Mustang proposal has the potential to be much more harmful and/or more beneficial than the Covanta proposal, depending on the details.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Mark A. Mitchell MD, MPH". The signature is written in a cursive style.

Mark A. Mitchell MD, MPH
Chair

ⁱ Stewart J.A., Mitchell, M.A., Edgerton, V.S., Van Cott R. "Environmental Justice and Health Effects of Urban Air Pollution" J. National Medical Assoc Vol 107:1 Feb 2015, pp50-58. [http://www.journalnma.org/article/S0027-9684\(15\)30009-2/fulltext](http://www.journalnma.org/article/S0027-9684(15)30009-2/fulltext).