

April 14, 2023

By Email

Connecticut Department of Energy & Environmental Protection
79 Elm Street, Hartford, CT 06106
DEEP.MMCAPPlanning@ct.gov

RE: Connecticut Zero Waste Coalition Response to Waste Infrastructure Request for Information

To Whom It May Concern:

The Connecticut Zero Waste Coalition and the undersigned individuals and groups write to express their significant concerns regarding the Request for Information (RFI) issued by the Connecticut Department of Energy and Environmental Protection (DEEP) to solicit information on the development of new solid waste management infrastructure in Connecticut. DEEP is exploring new waste disposal infrastructure in service of its goal of “regaining self-sufficiency in managing municipal solid waste disposal within Connecticut’s borders.” This is the wrong goal. Connecticut should not be looking for ways to dispose of waste within its own borders. It should be pursuing every available opportunity to eliminate, reduce, and divert that waste.

The Connecticut Zero Waste Coalition was formed in 2020 to help address Connecticut’s waste crisis by advocating for Zero Waste solutions that can help reduce Connecticut’s dependence on burning waste in incinerators and shipping waste to out-of-state landfills. The Coalition has consistently worked with DEEP and members of the Connecticut General Assembly to push for real solutions like an improved food waste ban and composting infrastructure, a modernized bottle bill, single-use plastic bans, an extended producer responsibility for packaging that prioritizes reduction and reuse, a statewide pay-as-you-throw program, and more. These Zero Waste solutions are the answer to Connecticut’s waste crisis.

New disposal infrastructure, on the other hand, will continue to subject Connecticut residents to toxic, climate-damaging, and expensive facilities that do not address the source of the crisis: waste itself. Moreover, Connecticut’s waste infrastructure has a long history of disproportionately burdening communities of color and low-income communities — prior to the closure of the Hartford incinerator, Connecticut burned a significant majority of its waste in and near communities of color in Hartford and Bridgeport. The Coalition has serious concerns that any new solid waste disposal infrastructure will follow these same discriminatory patterns.

The Zero Waste Coalition appreciates that DEEP is considering commercial composting facilities and anaerobic digestion facilities as a part of this RFI process. Commercial composting facilities are an essential part of reducing and diverting Connecticut’s waste. Organic waste comprises

more than a third of Connecticut’s municipal solid waste stream,¹ and large-scale composting is the single-best option for diverting that waste. Anaerobic digestion facilities can also play an important role, but only if those facilities: 1) do not contribute methane to Connecticut’s dangerous, leaking fracked gas pipelines; and 2) do not co-digest food and/or yard waste with sewage sludge, which poses significant toxic risks to the environment.²

Most of the remaining facilities that DEEP appears poised to consider, however — including waste incinerators, gasifiers, pyrolyzers, plasma arc facilities, and other “conversion processes that convert waste to renewable fuel, chemicals, electricity, or other useable products” — pose significant risks to public health, the environment, and our climate. Each of these facility types represents a misguided adherence to the toxic status quo that has burdened Connecticut communities for decades: burning waste.

Any process that uses heat to burn or break down solid waste — regardless of misnomers like “waste-to-energy,” “waste-to-fuel,” or “advanced recycling” — is necessarily toxic and climate-damaging. Incineration is the most expensive and polluting way to dispose of waste — it releases dangerous toxic chemicals like dioxins, lead, mercury, nitrogen oxides, and particulate matter, and it leaves behind toxic ash, which must be landfilled.³ Gasification and pyrolysis pose many of the same toxic and climate-damaging risks.⁴ When used to break plastics down into plastic-derived fuels, hydrocarbons, chemicals, and toxic waste byproducts, technologies including gasification, pyrolysis, solvolysis, and others that fall within the umbrella of “advanced recycling” or “chemical recycling” likewise release climate-damaging gases and dangerous toxics like lead, mercury, dioxins, benzene, and styrene.⁵

¹ DEEP, *2015 Statewide Waste Characterization Study 3-5* (2016), https://portal.ct.gov/-/media/DEEP/waste_management_and_disposal/Solid_Waste_Management_Plan/CMMSFinal2015MSWCharacterizationStudy.pdf?la=en.

² See Laura Orlando, Just Zero, *Why We Need to Stop Mixing Food Waste with Sewage Sludge* (2023), <https://just-zero.org/our-stories/from-my-experience/stop-mixing-food-waste-with-sewage-sludge/>.

³ See Energy Justice Network, *Waste Incineration (a.k.a. “Waste-to-Energy”)*, <http://www.energyjustice.net/incineration/>.

⁴ Neil Tangri & Monica Wilson, Global Alliance for Incinerator Alternatives, *Waste Gasification & Pyrolysis: High Risk, Low Yield Processes for Waste Management* 9 (2017), <https://www.no-burn.org/wp-content/uploads/Waste-Gasification-and-Pyrolysis-high-risk-low-yield-processes-march-2017.pdf>.

⁵ NRDC, *Recycling Lies: “Chemical Recycling” of Plastic is Just Greenwashing Incineration* 6 (2022), <https://www.nrdc.org/sites/default/files/chemical-recycling-greenwashing-incineration-ib.pdf>.

Connecticut needs real Zero Waste solutions. DEEP's focus on "self-sufficiency" at the expense of bold statewide programs that can dramatically reduce waste generation threatens to worsen Connecticut's waste crisis. The Connecticut Zero Waste Coalition urges DEEP to prioritize real solutions instead of pursuing new waste disposal infrastructure.

Sincerely,

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