



Public Hearing

Plan approval application for Reasonable Available Control Technology (RACT III)

Requirements for Covanta Delaware Valley waste to energy facility

Chester, Delaware County, PA

Verbal Comments

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Delaware Riverkeeper Network makes these comments tonight in opposition to the approval by PADEP of an application by Covanta Delaware Valley, LP for its waste-to-energy facility. The application is for a Plan Approval to install equipment regarding nitrogen oxides (NOx) that are emitted from the facility's six (6) waste combustors to bring it into compliance with new federal and state standards for air pollution under the federal Clean Air Act.

Delaware Riverkeeper Network opposes the approval of the plan because NOx will still be emitted (along with other pollutants) and these emissions will continue to harm the health of the people in Chester and the region and will adversely impact the Delaware River and its watershed.

Nitrogen Oxides or NOx are a group of poisonous, highly reactive gases.¹ These gases form when fuel is burned at high temperatures.² NOx and volatile organic compounds (VOC) react in the atmosphere with sunlight to produce ground-level ozone (smog), fouling the air. The Delaware Valley region, including Chester, is a non-attainment area for ozone and particle pollution³, meaning it does not meet federal air standards that are set to protect human health and the environment.

Of the six pollutants that are measured by national air quality standards, particle pollution and ground-level ozone have the most widespread health threats.⁴ NOx can cause respiratory distress and irritation, burns to the eyes and skin at higher levels and after prolonged exposure

¹ <https://www3.epa.gov/region1/airquality/nox.html>

² *Id.*

³ <https://www.dvrpc.org/airquality/>

⁴ <https://catalog.data.gov/dataset/us-epa-nonattainment-areas-and-designations>

can cause fluid buildup in the lungs, even death.⁵ There is no excuse to continue to allow any source of NOx emissions, or particle pollution, to continue in this unhealthy airshed that fails to meet basic air quality standards already. The people who live here and the environment they live in is being subjected to an intolerable and disproportionately high level of air pollution from which they cannot escape. The Covanta incinerator cannot be allowed to continue to operate.

This would be different if it were possible to eliminate NOx and other pollutants from being omitted by the incinerator. Not only is the proposed plan allowing the release of NOx to continue, the new technology being proposed in this air plan is not proven to mitigate the risks from other pollutants either. A recent study found high concentrations of toxics such as dioxins and furans at levels exceeding EU safety standards in the environment, on grass and in eggs locally produced, near an incinerator that burns sewage sludge and other waste.⁶ Are these alarmingly high levels of toxics polluting Chester and the region?

Even if the highest technology is employed, incineration technology cannot completely control the release of the pollutants that are in municipal waste, residual waste, and sewage sludge, which contain myriad contaminants that are not destroyed by burning and may not even be acknowledged in the waste stream, much less monitored.

The Operating Permit Renewal Review (August 2021) refers to a residual waste limit of 500 tons/day.⁷ This means that the company accepts a significant volume of residual waste from non-municipal sources that results in more waste with toxic or hazardous properties that are then emitted to the air (and end up in the fly ash). There is no batch-by-batch chemical sampling and reporting of what is in the waste stream each day, resulting in a lack of accurate accounting for what is actually being incinerated and emitted.

These pollutants are released from the smokestack to freely enter our lungs and deposit on water, soil, vegetation, and food. Also released by incinerators are saturated particles of toxic dust⁸, multiplying the ways people can be exposed. Some highly toxic compounds are not even tested for in the emissions such as per- and poly-fluoroalkyl substances (PFAS). For instance, PFOA has been found in the flue gases from an incinerator in Europe.⁹

Incineration is outdated, expensive and dirty and the Chester Covanta plant illustrates this with its aged systems. Incineration took hold in the 1980's, when the energy produced by burning

⁵ ATSDR ToxFAQs at: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwif9ID80Pr-AhVfjYkEHWd3B9IQFnoECBwQAw&url=https%3A%2F%2Fwww.atsdr.cdc.gov%2Ftoxfaq%2Ffacts175.pdf&usg=AOvVaw2vpy6pljsUEwf9z_uzkEzK

⁶ *Hidden Emissions*, Case study by Abel Arkenbout; editors: Roberta Arbinolo, Janek Vähk and Yianna Sigalou, Zero Waste Europe, 2018. Downloaded at: <https://zerowasteurope.us3.list-manage.com/track/click?u=8cbf453c18e9074b9004eb8a0&id=04addc108c&e=ea2f9fa000>

⁷ https://files.dep.state.pa.us/RegionalResources/SERO/SEROPortalFiles/Community%20Info/Covanta/Covanta-TVOP_23-00004_Renewal_SIGNED.pdf

⁸ *Hidden Emissions*, Case study by Abel Arkenbout; editors: Roberta Arbinolo, Janek Vähk and Yianna Sigalou, Zero Waste Europe, 2018. Downloaded at: <https://zerowasteurope.us3.list-manage.com/track/click?u=8cbf453c18e9074b9004eb8a0&id=04addc108c&e=ea2f9fa000>. PDF p. 7.

⁹ *Ibid.* PDF p. 9.

was seen as a top selling point and government incentives were put in place. However, today renewables that are more efficient and economical are replacing dirty energy sources. Incineration has been exposed as highly polluting and a constant source of noxious odors and eye-burning, lung-searing pollution for those who live and work here. It's intolerable and oppressive and cannot be allowed to continue. Rather than trying to bootstrap a failed technology, it is way past time to let incineration die. The Covanta incinerator here in Chester should be shut down now and should lead to the shutdown of all waste incinerators.