Stop Supporting Dirty Energy! Recycling is the Best Solution

Email dep.swm@state.ma.us by March 1 saying: no new incinerators, we want more recycling!

Massachusetts DEP is considering lifting its 23 year moratorium on the construction of new high heat facilities that turn garbage into energy. The Patrick administration claims these are innovative, new, and clean technologies. Yet evidence shows they are not, and that reuse and recycling are the proven options for managing our wastes in a way that saves energy, has the least toxic emissions, is best for the environment, and creates the most jobs. There are steps the state can take to help reduce the amount of waste we make, too. Massachusetts doesn't need new incinerators, of any kind.

Massachusetts Can Do More to Recycle

According to recent waste composition analyses conducted at the state's six existing waste combusters, significant amounts of recyclables are being thrown away.[1] This, despite bans on the disposal of certain easy to recycle materials with well established markets such as asphalt, brick and concrete; metals; clean gypsum wallboard; glass, metal and certain plastic containers; paper, cardboard, and paperboard; among others.

At least 75% of what goes to landfills and incinerators could instead be recycled or composted through existing and planned programs, saving more energy than that made by burning[2], avoiding methane escaping from landfills, creating more jobs and less pollution, and precluding the need to spend limited resources on additional waste-to-energy facilities. *We would not need new incinerators if we reduced, recycled and composted more of our wastes.*

Massachusetts Can Do More To Enforce Existing Recycling Policies

Despite these large amounts of banned recyclables going to disposal facilities, MassDEP has issued only three penalties statewide since August, 2009 for failure to comply with waste ban regulations— despite being aware of these violations. In October 2012, 50 truckloads containing 40-100% banned wood, paper, cardboard, glass, or plastic and identified as 'failed loads' by the landfill in South Hadley, were nevertheless allowed to dump that material instead of being sent to a recycling or composting facility, and DEP did not issue a fine. *If Massachusetts enforced its waste bans, there would be no need for new incinerators.*

Gasification Technologies Are Expensive, Dirty, and Untested

Attempts to gasify garbage have been around since the 1920's. If these technologies worked, they would be ubiquitous. Instead, despite claims that they will solve our garbage problems, these 'innovative, new' technologies that the Patrick Administration is considering have been fraught with problems including poor performance, cost overruns, and pollution. (See "Facts Rule Out Trash Gasification," http://tinyurl.com/gasification-facts)

According to a report by the Tellus Institute, commissioned by MassDEP, recycling and composting outperform all forms of high heat waste destruction technologies in terms of CO2 emissions, particulates, toxic emissions, and more. And, recycling saves more energy than is made by any of these technologies[3]. *Recycling is the better answer.*

Gasification Facilities May Attract Waste from Other States

The Patrick administration says it wants to increase incinerator capacity in order to be responsible and manage our wastes in state. But there is no way to require that in-state wastes will go to in-state landfills and incinerators, and no way to keep out of state waste from using our facilities. Even if these facilities get built, they may not be for our own waste! *Garbage will always go to the place that makes the most economic sense.*

Gasification Dirties Governor Patrick's Strong Record In Renewable Energy

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[1] http://www.mass.gov/dep/public/committee/swacwcs.pdf. Close to 26% of what is being burned is paper, 14% plastics, 5.5% metals, >2% glass, 21% organic materials, 14% construction and demolition debris, 3% household haz waste, 3% electronics, and 11% other, including textiles, fats and grease, and tires.

[2] http://www.mass.gov/dep/recycle/priorities/dswmpu01.htm, *Assessment of Materials Management Options for the Solid Waste Master Plan Review*

[3] http://www.mass.gov/dep/recycle/priorities/dswmpu01.htm, *Assessment of Materials Management Options for the Solid Waste Master Plan Review*

The only thing that makes energy generated from waste renewable is that we keep making garbage. But this is no ones definition of renewable! Most of the components of solid waste are not from renewable resources. The Natural Resources Defense Council estimates that 80% of municipal solid waste is non-renewable.[4] In addition, turning waste into energy instead of recycling means that new resources must be mined, drilled, or cut. Turning primary materials such as trees, bauxite, and petroleum into new products uses much more energy than recycling wastes back into new products. We would need to extract more of these materials if they are destroyed for energy.

Incinerator companies are working hard to get their technologies considered renewable, thus qualifying for certain subsidies, and taking attention away from real renewable sources of energy, like wind, water, and sun.

Incineration Competes For Recyclable Materials

Unlike a landfill, once an incinerator is built, it requires constant feeding. And that means that there is an inherent conflict between high recycling goals and incineration. Europe's growing overcapacity of incinerators means that it is in violation of EU policy that states that, by 2020, incineration with energy recovery should be limited to non-recyclable materials. However, the EU currently burns 22% of its waste, and non-recyclable materials amount to less than 20%. In Spain, only 16% of the waste is recycled due to incinerator over-capacity. [5]

Whether Facilities Get Built Or Not, Gasification Takes Away Attention And Resources From Recycling

Despite the fact that gasification facilities have a poor track record of getting built, and, if they do, performing, limited resources still get wasted by state and local governments (and therefore, taxpayers):

- To develop regulations and guidelines for facility siting and performance,
- To organize and hold public hearings and respond to comments,
- To review draft permits,
- To hire consultants, and
- To respond to what will surely be local and environmental opposition.

These are human and financial resources that could better be put into waste reduction and recycling programs. Taunton has already invested over $5 million into their hoped-for incinerator, which is nowhere close to being built. Even a fraction of this money could have been invested into a world class recycling program.

Gasification Is Not Zero Waste

DEP has chosen to call its Solid Waste Master Plan *Pathway to Zero Waste*. However, the international, peer reviewed definition of Zero Waste says that "Zero Waste means designing and managing products and processes to systematically avoid and eliminate the volume and toxicity of waste and materials, conserve and recover all resources, *and not burn or bury them*.[6]" Communities throughout the country with Zero Waste Goals are seeing recycling rates far higher than even Massachusetts' best recycling communities. Governor Patrick had the right idea when he wanted to lead the state towards Zero Waste. Rather than allowing more incineration, he should work to make Zero Waste a reality and not allow more high heat destruction of resources. DEP should either be honest and call the Master Plan what it is—A Big Distraction From Real Solutions—or, pursue a real Pathway to Zero Waste.

Recycling Is The Highest And Best Use Of Materials

Whether waste to energy facilities make fuel to burn on or off site or turn garbage directly into energy, it ultimately has the same result: *the destruction of resources that are better reduced, composted, reused, or recycled.*

Reuse, recycling, and composting have a track record of working that's as old as history; it is nature's way of doing things. They save energy and natural resources, reduce pollution from extraction through turning back into new products, and create ten times more jobs per ton of waste material generated than disposal or incineration[7].

Send comments by March 1 to dep.swm@state.ma.us saying: we want more recycling, not new incinerators!

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[4] http://switchboard.nrdc.org/blogs/ahershkowitz/municipal_waste_is_not_renewab.html

[5] http://www.no-burn.org/press-release-more-incineration-than-trash-to-burn-threatens-recycling-in-europe-1

[6] http://zwia.org/standards/zw-definition/

[7] http://www.ilsr.org/recycling-means-business/