

July 31, 2024

Recently I reread Neil Seldman's column on recycling and incinerators in the April edition of your magazine. At age 85, I do go back, with Mr Seldman, to the 1970's when Pennsylvania decided it was important to recycle. I recall this was an exciting time for me! Later, in the mid 1980's, I tried to stop two Delaware County, PA incinerators from being built in Chester. One incinerator operator collapsed on its own and the other, the Westinghouse incinerator was built and today is owned by Covanta Energy Corp. I had a lawsuit against DEP for allowing the company to build this incinerator, but for better or worse it was thrown out on a technicality. In the 1990's, I was also interested in the issues Zero Waste and Mr Seldman continue to be interested in--ie finding a reuse for whatever is put out on the curb as trash. I am still a dumpster diver.

Today, however I have changed my views on trash incineration here in Delaware County--partly because climate experts say that global warming is here--with more wildfires, tornadoes, floods, etc and its effects are only expected to become worse. And partly because the Delaware Co Solid Waste Authority seems to so flagrantly ignore this global warming issue with its plan to haul all our trash to a landfill 50 miles away in Berks County when there is an incinerator nearby.

Besides the tons of carbon dioxide created every day, these over the road diesel powered trucks emit tons of soot on the way, including pm 2.5's--tiny particles that can enter our lungs, negatively affecting our breathing capacity.

At the Berks County landfill, a serious greenhouse gas methane- that is emitted by all landfills under anaerobic conditions has to be collected. Up to now, at least, the landfills collection system has never been considered first rate. Maybe it will be in the future as DEP has now installed equipment to monitor methane emissions.

Back at the Covanta incinerator, no methane should be created in the presence of excess oxygen. So it is understandable why the EPA has long preferred trash incineration with energy recovery-electricity-to landfills.

If an incinerator was being proposed for Delaware County today, I would hope it wouldn't be sited in Chester where a number of people there, rightly or wrongly, believe that their health has been negatively compromised by the emissions of the Covanta incinerator. However DEP says that the facility does meet its emission standards-with its 24 hour a day monitoring equipment, and Covanta does pay host fees to the city in excess of \$6,000,000 a year, that Chester uses to pay for basic city services.

Recently the EPA has placed some restrictions on the amount of 'forever chemicals'-polyfluoro alkyl compounds-that can be in our drinking water. How does this ruling affect incinerators or landfills? Forever chemicals are in many of the items we use or wear, as I believe it is nearly impossible to keep them out of the manufacturing process.

The Berks County landfill collects these 'forever chemicals' in the landfills leachate. Leachate is the rainwater that falls on a landfill, that picks up bits of solids, liquids and gases as it descends

through the landfill, until it is collected on a liner. Now because landfills do not seem to break down these forever chemicals, the DC Solid Waste Authority takes most of its leachate to the Pottstown Sewage Treatment plant, where they can treat this leachate when there is enough water in the stream nearby. At times DCSWA hauls this leachate, with the forever chemicals, to Delcora in Chester that is right on the Delaware River. How do these sewage treatment plants handle these forever chemicals. I don't know, for sure, but I suspect they simply drop this leachate into their receiving streams or the Delaware River.

I also believe that the high temperature that the Covanta incinerator operates at--about 2000 degrees breaks down the forever chemicals. So this is another reason for choosing trash incineration.

Finally, there are the costs of hauling our trash to Berks County. Currently there are and will be significant expenses to expand the present landfill and pay the host fees to Earle Township, plus the cost of hauling all this trash to Berks County--when the landfill will be filled up in 15 years. So I can't see how Delaware County's Solid Waste Authority's plans to stop using the Covanta incinerator and hauling all our trash to Berks Co makes financial (or environmental) sense for residents, like me.

*Andrew Saul*  
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CC > 20 people on orgs

June 17, 2024

Adam Ortiz  
Adm. Region 3, EPA  
Phila., PA

Dear Mr. Ortiz:

Recently Kathleen Carey had an article in the Delaware County Daily Times about Delaware County's future plans about how they plan to handle and dispose of our trash and recyclables. The County owns a landfill—Rolling Hills in southern Berks County—where the County's main focus will be. This also means that they will be closing down most of its dealings with Covanta Corp which has one of the largest incinerators in the Country.

This makes little sense to me as I know Covanta gives the County a little better deal than they do their out of County and out of State trash customers because the incinerator is in the County and Delaware County accepts the incinerators ash, though it has to be hauled about 55 miles to Rolling Hills.

Besides the long trip to Berks County to haul our waste there, using diesel trucks that create a lot of greenhouse gases, there is an imbalance of greenhouse gases created in landfills (CH<sub>4</sub>, methane) and incinerators (CO<sub>2</sub>). Incineration of waste, in an excess of Oxygen, creates CO<sub>2</sub>—a greenhouse gas, yes but not nearly the global climate problem that methane is. Is it any wonder the EPA prefers incineration over landfills!

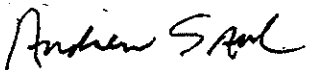
Lastly a concern that the Daily Times article did not consider. PFAS, also known as 'forever chemicals' which I believe are mostly destroyed in the heat and flames of the incinerator, are clearly not destroyed in landfills. At one of the last DCSWA's meetings I attended in mid 2023, they were already spending a considerable amount of money to make the PFAS in the leachate disappear—even hauling this leachate back to Delcora, in Chester to be treated.

As this letter is addressed to the EPA and DEP I also have a question for you. I have been interested in incinerators and trash for 25 years. It was my belief that the ash from incinerators was quite toxic because, with as the many plastics containers we have thrown away, melted and combusted, at Covanta, many heavy metals are released and become part of the ash. Yes, Covanta adds a lot of lime to ameliorate the problem, but why does the EPA allow DCSWA to use this ash as a cover at Rolling Hills? In my view using a leaf compost as a cover is a safer way to keep any metals out of the air and groundwater.

This is what I have proposed to do at Ridley Creek State Park, should it ever be approved.

In Kathleen Carey's article, it also seems that DCSWA was trying to favorably compare the amount of energy created in a landfill to what is made at an incinerator. Collecting methane at a landfill is not a sure thing. A colorless gas it can escape into the air through poorly made seams in the plastic cover or through pulling and stretching of the plastic by the heavy trucks and bulldozers as they fill up a landfill with trash. With waste-to-energy incinerator like Covanta, they simply use the heat generated by the trash to turn steam turbines and electric generators to make electricity.

Sincerely,



Andrew Saul  
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