



—NOTICE OF ENVIRONMENTAL ADVISORY STATEMENT—
Environmental Advisory Council
City of Allentown

On March 29, 2012 Allentown signed a 35-year contract with a private NJ company, Delta Thermo Energy (DTE), to build an incinerator on Kline's Island in Allentown for disposal of the city's trash and sewage sludge. The incinerator will be generating electricity from the heat generated in the combustor.

The EAC was briefed on the DTE process multiple times starting in 2010 by DTE's company principals, Mayor Pawlowski, and advisors on the project. The EAC has done its own research which included consultations with people knowledgeable in related fields. Allentown has no control over any aspect of the operation of the facility, including monitoring, maintenance, or problems that may arise if this untried technology fails. The contract requires the city to pay DTE millions of dollars per year for 35 years to process and dispose of the city's trash and sewage sludge.

It is the opinion of the EAC that this contract puts Allentown at unnecessary risk for financial losses and environmental damage to the city's air, water, and quality of life while discouraging the adoption of less expensive and environmentally healthier options for its waste.

- 1) An argument made for the incinerator is that the cost to landfill the city's trash and sewage sludge will rise dramatically in a few years due to dwindling availability of landfill space. In fact, the Lehigh Valley has three huge landfills, Chrin, IESI, and Grand Central. According to information from the DEP, a least one of the landfills has capacity for current levels of waste production for three decades. Two local landfills have announced plans for expansion. There are also opportunities to develop additional landfills.
- 2) DTE claims the electricity produced in this facility will be clean energy. In fact, trash incineration produces more pollution than any other sort of electricity generation, and is much worse than coal for releases of mercury, lead, nitrogen oxides, sulfur dioxide, carbon monoxide and carbon dioxide. Trash incineration is also one of the largest sources of dioxin pollution – among the most toxic man-made chemicals. Many toxic materials found in trash cannot be destroyed. They could go up and out smokestack, be in water discharged into local waterways or be in the ash going to our landfills. Concentrated toxic ash is more dangerous in landfills than if the unburned waste was landfilled directly.
- 3) The backers of the incinerator claim it will not pollute because it has to comply with the PA Department of Environmental Protection (DEP) regulations. In reality, the DEP regulates and requires monitoring of only a small number of pollutants and for those, the limits are not based on health or safety but on what is practical for various industries to meet. Once an incinerator is operating, DEP rarely shuts it down when it violates regulations. Although DEP may impose fines, owners often put off fixing the problems and sometimes consider paying the fines as a cost of doing business.
- 4) The contract creates a disincentive to reduce waste. The incinerator needs a minimum

volume of waste to work efficiently, about the same as the current amount of waste produced by the city. Should the city produce less waste through increased recycling and composting it will still be charged full price. This potential financial burden will be borne by Allentown taxpayers for decades and makes it all the more difficult to find better solution. The preferred way to reduce the amount of trash going to landfills is to lessen the amount of trash created by the city residents. Much of what is sent to landfills can be eliminated, recycled, or reused. Easily recyclable materials include nearly all metal, glass, paper and plastic, electronic gear and appliances. Most food and plant material can be composted and returned to the soil. Clothes, furniture and toys can be sold or donated. As has been shown in other cities, educating the public and enforcing and incentivizing trash reducing practices would reduce the amount of trash necessary to operate the incinerator. The number of truckloads of trash going to landfills from Allentown could be cut more than 50%.

While this statement deals primarily with the environmental aspects of the project, we feel obliged to state we believe the arrangement between Allentown and DTE will be financially far more costly than continuing the present system.

In conclusion, the EAC sees no justification for Allentown to engage in a long term contract that binds it to a system of waste disposal that is potentially both environmentally and financially detrimental to the city and over which it has no control.

Julie Thomases, Chair

Allentown Environmental Advisory Council

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