

From Eva Gnacik

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"nutritiontransition@juno.com" <nutritiontransition@juno.com> 08/09/2011 09:51 PM To secretary@dps.state.ny.uscc Subject

Case 03-E-0188, Covanta Petition to Include Garbage Incineration (Wastto-Energy) in New York's Renewable Portfolio Standard Program

The Honorable Jaclyn A. Brillling  
Secretary  
New York State Public Service Commission  
Agency Building 3  
Empire State Plaza  
Albany, NY 12223-1350

Re: Case 03-E-0188, Covanta Petition to Include Garbage Incineration (Waste-to-Energy) in New York's Renewable Portfolio Standard Program.

Dear Secretary Brillling:

The Great Neck Breast Cancer Coalition, a not-for-profit 501 C3 organization, is writing to express our opposition to Covanta Energy's petition to include garbage incineration as an eligible technology for inclusion in the state's Renewable Portfolio Standard (RPS). As one of our many goals, our organization seeks to prevent breast cancer from occurring in the first place by reducing or eliminating toxic emissions and exposures. Garbage incineration pollutes our air with toxins such as mercury and dioxin and a host of other toxic chemicals that have been linked through numerous studies with breast cancer and other cancers.

The goal of the RPS is to promote clean energy technologies with the least adverse environmental impacts. Garbage incineration (waste-to-energy) does not meet that goal. The Public Service Commission (PSC) should focus the state's limited financial resources on encouraging the production of renewable energy from clean resources rather than subsidizing major polluting facilities like garbage incinerators.

Municipal solid waste (MSW) is not a renewable source of energy. While the state's policy goal is to minimize solid waste through waste prevention, recycling and reuse, incinerators require a steady supply of garbage to burn as fuel. New York's current solid waste management plan sets a goal of reducing solid waste by 86% by 2030. The plan does not support including garbage incineration as renewable energy. On the contrary, it recognizes that capturing the embedded energy of materials by recycling or composting them saves far more energy than incineration recovers. The state's current energy policy also does not support classifying garbage incineration as renewable.

Mixed MSW is a very dirty and inefficient fuel source. In addition to generating large quantities of ash that must be disposed of and releasing highly toxic emissions such as dioxin and mercury into the air, garbage incinerators release far more carbon dioxide emissions than coal plants.

Incinerators are also extremely expensive to build and to operate. Allowing garbage incineration to be eligible for the RPS could drain substantial resources away from solar, wind and other clean renewable energy sources

and thus adversely impact the state's ability to meet its clean energy goals. The PSC has repeatedly rejected the inclusion of garbage incineration in the RPS because of its adverse environmental impacts. There is no new information in Covanta's petition that merits a change in that position.

*Cancer rates are already so high on Long Island and in New York State. We can't afford to further compromise public health through exposure to toxic emissions* . We therefore urge the PSC to deny Covanta's petition to include garbage incineration in the Renewable Portfolio Standard.

Sincerely,

Lisa Levine, MSN, RN, FNP  
Vice President, Great Neck Breast Cancer Coalition

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