

THE FACTS

The following information is a “lite” version of some of the technical comments prepared by the board of People for Less Pollution and consulting engineers. You can view the full comments on our web site www.lesspollution.org (exact web page – www.lesspollution.org/comments.html)

1) If International Paper wants to burn tires, they should install the appropriate equipment to better remove the poisonous byproducts that will permeate the air. An electrostatic precipitator is the obvious choice, since it is used for this purpose in many similar facilities, including six owned by I.P.

2) An electrostatic precipitator would cost approximately 5 million dollars (and certainly no more than 10 million dollars); while burning tires would save I.P. in the vicinity of 3-4 million dollars a year in fuel costs. An investment that pays for itself in 2 to 3 years sounds like a winner - unless IP has no interest in keeping the Ti mill open that long. I.P. had gross sales over 25 billion dollars in 2004.

3) Their current equipment is pretty good at the removing larger particles, but not the smaller ones. These “tiny particulates” are significantly more hazardous - and result in an increased risk of respiratory problems and lung cancer. Their current equipment does a lousy job with these fine particulates.

4) The testing that is proposed will not measure the quantities of these dangerous, tiny particles, nor

the types and amounts of toxics absorbed onto their surfaces. The EPA is currently considering cutting the “safe” fine particulate level in half. These new regulations are due to take effect in September of 2006. The American Lung Association and hundreds of scientific studies have found higher levels of fine particulates in the air to cause increased respiratory problems, cancer and premature death. According to the Vermont Lung Association, 2,436 adults and 673 children suffer from asthma in Addison County alone. This represents almost 9% of the total population of 38,000 Addison County residents. Passing the test does not signify a comfortable level of safety in the air we will be breathing.

5) The permit application assumes a 73% removal efficiency for all metals, based on a nickel study. This is most likely inaccurate and is deceiving. Zinc, for example, may be removed at a lower efficiency. Zinc is especially important because it may pass through their current pollution control equipment due to its small size.

6) Dioxin compounds form at certain temperature ranges in the post combustion region of boilers. Temperature should be measured in several places in this region, as the production of dioxins is a very, very serious issue. Dioxin is one of the most damaging chemicals on the planet.

7) Water pollution is not adequately addressed in the permit. I.P. sent a letter to the N.Y. Department of Environmental Conservation. It doesn't discuss the expected efficiency the wastewater treatment plant will have in removing zinc and other metals. Nor does it mention what will happen to the metals that will be dumped into Lake Champlain.

8) The permit does not adequately address the uniqueness of the pollution control equipment at the plant. It has a unique design and is not easily compared to pollution control equipment at other plants. The permit application itself admits to approximately a 75% removal rate of overall particulates, when other plants show better than a 95% efficiency rate.

9) I.P. has stated that 80 to 90 industrial plants burn tires for fuel. They provide no background information as to the type of plant, the amount of tires being burned, or the type of pollution control equipment in place. A 1999 EPA report compiles the results from tire burn trials at a number of facilities, including some paper mills. The zinc and total particulate emissions for all paper facilities increased when burning tires.

10) I.P. has a history of frequent and serious toxic spills and other violations of environmental regulations. They have also been willing to cover up these disasters either by not reporting them or by outright fibbing.