

People for Less Pollution

Working together for a safe and healthy environment in the Champlain Valley

Newsletter 2 — November 2005

— E-mail: nontoxic@sover.net —

www.lesspollution.org

Draft Permit to Pollute Issued to International Paper TWO IMPORTANT MEETINGS YOU MUST ATTEND

1st Important Meeting:

Wed., November 9, 2005

Caravan of Buses

to Travel to Ticonderoga, NY

Public Comment

Hearing

Buses Leave at 5:30 PM

from Middlebury

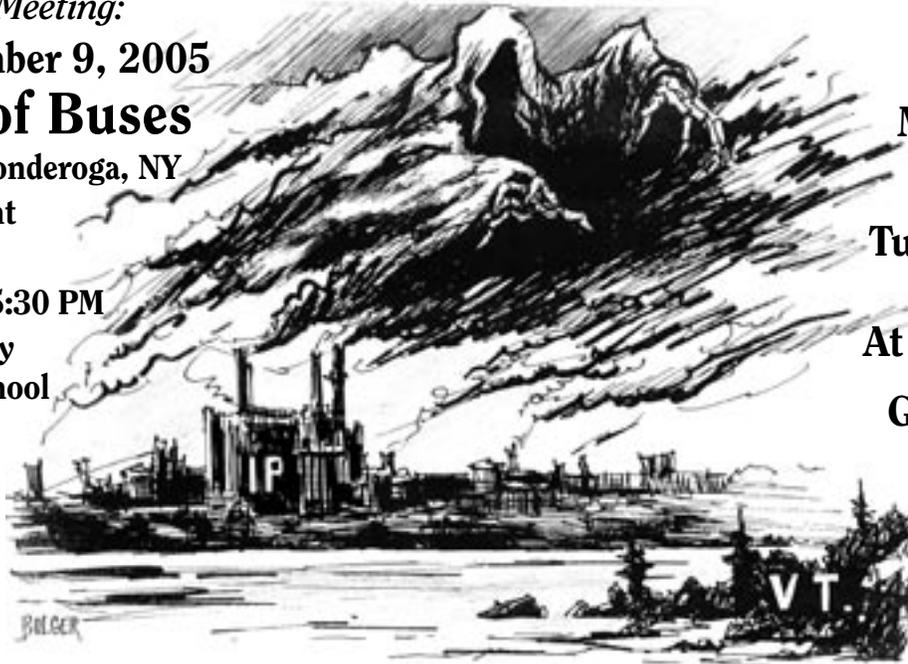
Union High School

We will be attending the 7:00 PM meeting in Ticonderoga, NY

to deliver our comments in person to the New York Dept. of Environmental

Conservation (NYDEC). The NYDEC is the agency granting the draft permit to International Paper (IP) that will allow them to burn tires without the minimum pollution control needed to burn tires safely (an Electrostatic Precipitator ESP).

The NYDEC has repeatedly ignored the concerns of those opposed to the test burn, including Governor Douglas, Senator Jeffords, Vermont legislators, many business groups and countless Vermont citizens. **The NYDEC is moving ahead with a flawed and incomplete permit** (see page 2). The NYDEC needs to meet face-to-face the people whose health they threaten!



"SOMETHING WICKED THIS WAY COMES"

Artwork by Joe Bolger, Shoreham Resident and MUHS Art Teacher

2nd Important Meeting to be held in Middlebury

Tues. Nov. 15, 2005

6 – 10 PM

At the Middle School

Governor Douglas to Attend

Vermont Dept. Of Environmental Conservation to collect public comments to send to the NYDEC

Vermont officials will gather comments to forward to the NYDEC (New York decides the permit). They encourage you to send your comments in writing as well, directly to the NYDEC (address on page 2). Governor Douglas will attend this meeting. Governor Douglas is strongly opposed to the test burn of tires by IP without an ESP and has vowed to fight IP and the NYDEC with every means at his disposal. It is important to come to this meeting to find out what the Governor will do, and also to support his strong stance. **The Middlebury Union Middle School is located at 48 Deerfield Lane in Middlebury, VT, just off Route 7** (southern part of town).

3 Things You Can Do to Stop the IP Tire Burn (before it is too late to act!)

- 1** Join the Bus Caravan to the Ticonderoga, NY Public Comment Meeting on Wed. November 9. Buses leave from MUHS at 5:30 PM
- 2** Attend the Public Comment Meeting in Middlebury, Tues., Nov. 15, from 6-10 PM. at the Middle School.

3 Mail your Written Comments to the NYDEC—**NOW** is when your comments finally COUNT! (Deadline Dec. 9, 2005, see page 2)

Call 352-4416 for bus reservations & directions.

Reserve your seats as soon as possible. We need to pay in advance for the buses.

Buses Depart: Middlebury Union High School, located just off Route 7 on Charles Ave. in Middlebury. Please arrive by 5:15 for boarding buses.

Buses will begin returning from Ticonderoga to Middlebury at 8:45 PM

If you drive, contact us about car-pooling. **Call about alternate Bus Routes.**

NY HEARING: Ticonderoga Armory Community Ctr., 123 Champlain Ave. Ticonderoga, NY

SERIOUS ISSUES OF CONCERN WITH IP'S DRAFT PERMIT TO BURN TIRES

The following technical comments were compiled for People for Less Pollution by Chemical Engineers: Holly D. Ferguson, Ph.D. and James Ferguson, Ph.D.; and Bob Murray, Ph.D. They can be used developing your own comment to the NYDEC or

take a minute and PLEASE JUST WRITE DOWN YOUR OWN CONCERNS about International Paper Burning Tires without an ESP and send them to the NYDEC as soon as possible. The mailing address is below and can be used as a label.

1. If IP-Ti wants to burn dirty fuels (such as tire-derived fuel (TDF) or sludge they should install equipment to remove fine particulates, in all likelihood an electrostatic precipitator (ESP). We believe the installed cost of such a unit to be very roughly \$5 million, which, for a savings of over \$3 million per year, would provide a good rate of return on the investment.

An ESP is a particularly good choice when burning TDF, because the zinc oxide is homogeneously dispersed in the rubber and hence has significant potential to produce the fine particulates that are now known to be much more harmful to human health than the larger fly ash.

2. The revised permit application does not contain an adequate discussion of how burning TDF will affect PM 2.5 emissions and how PM 2.5 emissions will be monitored. Wet scrubbers have high particulate removal efficiencies for particles over 10 microns, but only about 50% removal of particles in the 0.1 to 1 micron range (this is smaller than fly ash, in the size range of tobacco smoke). These fine particulates, known to be significantly more hazardous to human health, can be efficiently removed by electrostatic precipitators (ESPs).

3. The permit does not specify the grade of tire-derived fuel that could be burned during the test. IP is planning to burn a higher-grade tire-derived fuel during the test burn which does not have the same composition as the lower-grade TDF which will be burned if the plant is granted permission to burn TDF on a regular basis. IP lacks proper equipment for feeding TDF to the power boiler and proposes to burn a higher-grade TDF during the test burn that will have different energy, ash, zinc, and metal contents than the lower-grade TDF. Results of the test burn will not be directly comparable to the operating conditions in the plant or the magnitude of pollutants released from the plant if IP is granted permission to burn TDF on a regular basis.

MAIL YOUR OWN COMMENT TODAY

Comments presented at the Public Hearing will be recorded (written comments can be hand delivered).

MAIL YOUR WRITTEN COMMENTS TO:

Michael J. McMurray
NYS Department
of Environmental Conservation
Environmental Permits
1115 Route 86 • P.O. Box 296
Ray Brook, New York 12977-0296

DEADLINE: DECEMBER 9, 2005

4. The revised permit application does not accurately characterize/ analyze the composition of the raw TDF. No statistical analysis of the composition of the TDF is presented in the application. The inability of IP-Ti to adequately characterize the composition of TDF compromises any attempt to predict emissions during the test burn.

5. The revised permit application assumes a 73% control efficiency for all metals. It does not make sense to treat zinc the same as the other metals in terms of removal efficiency. The actual nickel control efficiency during the 1999 stack test varied between 51 and 88% depending on nickel feed rate. No statistical analysis beyond a simple average is presented for the assumed 73% control efficiency. Zinc is molecularly dispersed in the tires (it is added in the manufacture of synthetic rubber – it is a homogeneous reaction catalyst that is not removed from the final product). It does not make sense to treat zinc the same as the other metals in terms of removal efficiency. The molecularly-dispersed zinc may provide a nucleation site in the formation of particulates and could be expected to be removed at a much lower efficiency.

6. The revised permit application does not adequately consider the potential for high zinc emissions during the test burn. Zinc oxide is homogeneously dispersed in the rubber; therefore burning the rubber will release very small particulates of zinc. These can do various things, including agglomeration but also including absorbing products of incomplete combustion (PICs) and then passing right through the current air pollution control equipment (because of their very small size) and exiting the smokestack. The 1997 EPA Report found major increases in zinc emissions in all but one facility. That facility was equipped with an ESP! An ESP would be able to remove the very fine particulates that would just go right through a scrubber

7. Boiler temperature will not be adequately monitored during the proposed test. Dioxin-family compounds are known to form in the post-combustion region of boilers. It is also well known that dioxin family compounds form at intermediate temperatures (ca. 400 to 800 deg. F – in the post-combustion region). Could operating with TDF cause more dioxin family compounds in the post-combustion region? This possibility has not been seriously addressed in the application.

8. The revised permit application does not adequately address water pollution and solid waste disposal issues arising from the test burn. IP's letter to the NYDEC regarding waste water impacts of the test burn does not include any data to support the projected 50% zinc removal efficiency by the wet scrubber. It is not clear how the assumed

73% control efficiency for zinc and metals in the air permit relates to the projected 50% zinc removal efficiency by the wet scrubber. Estimates of scrubber removal efficiency for other metals are not provided in the letter. The letter contains no information concerning (or attempts to model) the distribution and fate of pollutants released into Lake Champlain during the test burn.

9. The revised permit application does not contain an adequate discussion of how burning TDF will effect NOx emissions. In most cases, TDF is replacing coal, not oil. In comparison to oil, coal, like TDF, is a solid and has much higher levels of ash and metals.

10. The potential for mercury emissions during the test burn is not seriously considered in the revised permit application.

11. The revised permit application does not adequately describe the pollution controls in use at the plant. Wet scrubbers, particularly those designed for gas (SOx) removal such as the IP-Ti power boiler scrubber, are not as effective for particulate matter removal. This is highlighted by the low removal efficiency reported in the IP permit documents (~75%). A well designed scrubber for particulate removal should have >95% efficiency.

12. IP has stated that over 80 industrial plants burn TDF but has provided no background information as to the type of plant, the amount and % of fuel burned as TDF, and the type of pollution controls in place on each plant. It's not possible to compare the IP plant to other facilities burning TDF without this information. The 1999 EPA Report compiles the results from TDF trials at a number of facilities, including some paper mills. Particulate emissions for ALL pulp/paper facilities increased when TDF was burned.

13. International Paper's burning of tire-derived fuel without an ESP has not taken into account new particulate standards proposed and under consideration by the EPA. EPA staff has recommended, and The Clean Air Scientific Advisory Committee has endorsed, a new standard for fine particles that are also small enough to be inhaled into the thoracic region of the lungs. Called PM 10-2.5, fine particles are smaller than PM 10 but larger than PM 2.5. Particles of this size range are associated with respiratory illness. In the draft Staff Paper, the EPA staff scientists recommended cutting the daily standard by half. EPA is under a Consent Decree to issue a proposed rule by 12/20/05, and a final rule by 9/27/06.

THESE COMMENTS HAVE BEEN EDITED.
FULL TECHNICAL COMMENTS ONLINE:
www.lesspollution.org/comments.html
PLEASE SEND YOUR COMMENTS ASAP!

Overwhelming Opposition to IP Tire Burn

Governor Douglas Vows to Fight IP Test Burn of Tires with All Resources Available to Vermont:

“I join with thousands of other Vermonters in opposing this plan, especially in light of IP’s persistent refusal to upgrade the pollution controls at the Ticonderoga facility by installing an Electrostatic Precipitator (ESP) on the power boiler before proceeding with any plan to burn TDF. Notably, IP has ESPs installed on every boiler that regularly burns TDF across the nation and on another smaller boiler at the Ticonderoga facility. That is the right thing to do: ESP control devices are considered the industry standard pollution control device when using TDF.

EPA is just now phasing in new standards for fine particulate matter (PM2.5), based on a better scientific understanding of how these tiny particles affect human health. Particularly at-risk are young children who breathe much more rapidly than adults, tend to be more active and risk much longer exposure to contaminants due to their longer expected lifetimes. The underlying permit for IP was written before these new requirements went into effect and is wholly inadequate in its requirements relative to PM2.5. Indeed, even the draft permit issued by NY DEC fails to require the stack testing necessary to document these emissions during the proposed test.”

—GOVERNOR JAMES DOUGLAS

What’s so Bad About Zinc?

Tires contain approximately 1.75% zinc by volume. Zinc is evenly mixed in the rubber and cannot be removed from tires before they are burned. When tires are burned, large amounts of zinc escape as fine particulates (especially when the facility burning tires has no ESP). Escaping particles of zinc, invisible to the naked eye, are carriers of the toxins and dioxins that cause cancer. These fine particles can travel directly from the lungs to the bloodstream. Fine particulates can travel 100s of miles.

American Lung Association: EPA Particulate Levels Unsafe

Over 2,000 studies have been published since 1996 when the EPA last reviewed the standards for particle pollution. The new studies show the strong relationship between particle pollution, illness, hospitalization and premature death. Recent studies show that the health effects of particle pollution may be more far reaching than was previously understood.

Particulate air pollution can affect the cardiovascular system as well as the lungs, triggering heart attacks and strokes. Lives are shortened not just by days or weeks, but by months or years. Air pollution targets not just the elderly, but also fetuses, infants, children and adolescents. People most at risk are not only those with asthma and COPD, but also those with heart conditions and diabetes. Harmful effects are occurring at levels below the current EPA standards.

Addison Co. Board of Realtors™ Passes Resolution Opposing IP

On October 12, 2005 the Addison County Board of Realtors™ (ACBOR) passed a resolution against IP burning 72 tons of tires without first installing an ESP. The ACBOR feels that the tire burn is a threat to clean air and water in the Champlain Valley. Chris Dayton, President of the ACBOR said, “We don’t want to compromise our quality of life or the quality of Vermont products.”

An ESP Would be Good for Both Job Security of Workers at IP-Ti and the Health of Local Residents

Upgrading the pollution control equipment at IP-Ticonderoga to burn tires safely would be a sign from Corporate IP that they intend to keep the plant open. Only a commitment to modern technology will keep IP -Ti competitive in the future.

Burning tires is no insurance for keeping a plant open. IP’s plant in Loch Haven, PA burned tires for 3 years and shut down.

IP can afford to install an ESP. But they need support from Corporate Headquarters. A study by the Washington, DC based Institute for Policy Studies: *Executive Excess, CEOs win, Workers and Taxpayers Lose*, reported that IP CEO John Dillon layed off 3,797 workers in 2001, while taking a 122% increase in compensation of \$4,739,000, giving himself \$8,615,000 in 2002. Burning tires irresponsibly and disregarding local residents’ health will not make IP more solvent!

We need your help NOW to continue...

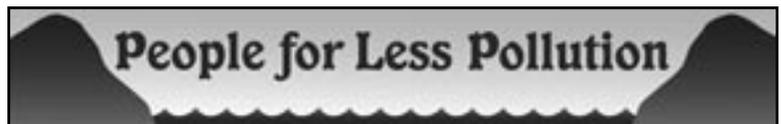
This may be our last printed newsletter. Our mailing list grew from 800 to 1,600 since the last issue and printing and mailing costs are close to \$900 an issue. We will try our first E-mail newsletter to keep people informed about the permit hearings soon. Future issues may be by e-mail only. **Please send us an e-mail at nontoxic@sover.net with your e-mail address to keep up-to-date.**

I want to help protect the air & water of the Champlain Valley. Here is my contribution:

- \$25. (Suggested Contribution)
 \$50. \$100. \$500. Other _____

Stay in print. I’d like to cover the costs of the next newsletter, here is: \$900.

- I would like to contribute time helping out



Send your contribution to: People for Less Pollution

Any size contribution is appreciated

P.O. Box 1350
Middlebury, Vermont 05753

Name _____

Address _____

City _____ State _____ Zip _____

Telephone _____

E-mail _____

Please make your checks out to: People for Less Pollution. Call 802-948-2840 if you are a Foundation or would like to make a tax-deductible contribution.

Travel with your friends and neighbors by bus for FREE! Or car-pool in your own car. Call 388-4416 to check on bus routes that may stop near you.



Make Your Voice Heard on November 9, 2005

A Draft Permit to Test Burn 72 Tons of Tires a Day has been issued to International Paper (IP), Ticonderoga

Please join Us as We Travel by Bus to Ticonderoga, NY

Buses are FREE

and leave from Middlebury H.S. at 5:30 PM for the 7 PM Meeting.

Call 352-4416 for details

RESERVE YOUR SEAT NOW!



IF YOU MISS THE BUS – ATTEND THE MIDDLEBURY MEETING, TUESDAY, NOVEMBER 15, 6-10 PM at the Middle School



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