

People for Less Pollution

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

Newsletter 3 — September 2006

— E-mail: nontoxic@sover.net —

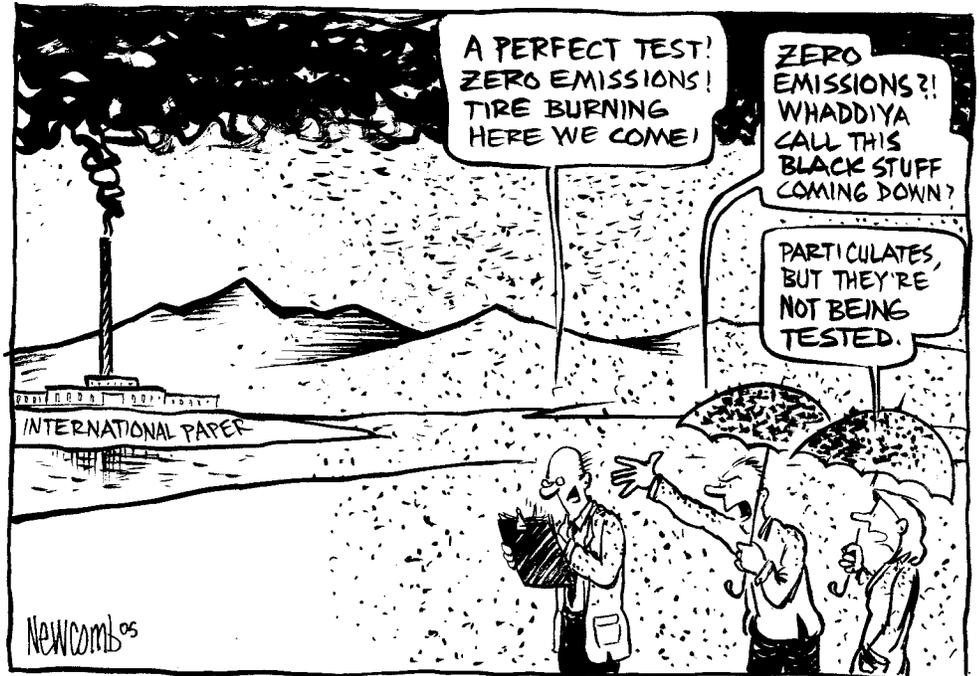
www.lesspollution.org

NYDEC Approves International Paper Tire Burn Test—without ESP – Despite Known Dangers to Health

The permit was approved despite:

- ▶ The mill's lack of the proper pollution control equipment (an Electrostatic Precipitator, ESP) required to remove small particles produced by burning tires.
- ▶ Governor Douglas's offer to help find funding to buy an ESP for the mill.
- ▶ Proposed EPA revisions to the fine particulate air pollution standards.
- ▶ Failure to explain why they approved tire burning at the Ticonderoga mill without an ESP, when a new plant would be required to have an ESP.
- ▶ Failure to investigate technical issues concerning: the chemical analysis of the tire-derived fuel and the release of fine particulate, heavy metal, and polycyclic aromatic hydrocarbon air pollutants, and other cancer causing substances released when burning tires.

Speak out against this precedent-setting step backward that allows a corporation to pollute irresponsibly!



Note on the Illustration: IP will not test for fine particulates when they do their test burn of tires. These fine particulates are the most harmful, they carry known toxins that cause cancer. IP's wet scrubbers are not designed to catch these fine particles, so large amounts of them will escape into the air of New York and Vermont. Fine particulates travel hundreds of miles, they penetrate deeply into lungs where they are most harmful. Unfortunately fine particulates are too small to see with the human eye—so you won't be aware of the danger as in the drawing.

WE ARE NOW IN THE 60-DAY PERIOD WHERE YOU CAN PETITION THE EPA TO STOP THE TEST BURN*

CONTACT EPA REGION 2:
Alan J. Steinberg, EPA Region 2
Administrator, Phone: 212-637-5000
E-Mail: steinberg.alan@epa.gov

Tell his boss to stop the tire burn:

Stephen L. Johnson, Head, U.S.E.P.A.
1200 Pennsylvania Avenue, NW,
Washington, D.C. 20460
PHONE: 202-564-4700

CONTACT THE NY DEC:

Denise M. Sheehan, Commissioner
Phone: 518-402-8540
E-mail: dmsheeha@gw.dec.state.ny.us

EPA fails to protect health of Americans

Government Accountability Office finds that the EPA has mismanaged Toxic Air Program — Vermonter's to be guinea pigs in outdated test!

What issue has an even lower priority at the Environmental Protection Agency (EPA) than climate change and global warming? According to a recent report by the Government Accountability Office (GAO) the EPA was cited for failing to protect the health of the American public by reducing toxic air pollutants as mandated by the Clean Air Act. The GAO found that the EPA has mismanaged the Toxics Air Program and is many years behind enacting standards on known toxic air pollutants that cause cancer.

This negligence on the part of the EPA will have a direct impact on the health of Addison county residents this fall. On September 11, 2006 the EPA granted permission for International Paper of Ticonderoga to test burn tires. The time has come for Vermonters to speak out and protect the health of their families. This unsafe test burn will set a precedent for other companies to pollute. **Take the time to tell the EPA (box at left) you want them to stop this tire burn before it is too late.**

* IP Can start Tire Burn during Petition Period if NYDEC allows them. Make sure Vermont takes legal action to stop any tire burn before petitions are heard!

Concerns about Health risks raised by 1000's of Vermont Citizens and Vermont Leaders Ignored by NYDEC and EPA

GREEN CAMPAIGN

A number of "green companies" use IP products in their packaging. Although IP seems deaf to the concerns of Vermonters, we think they just may listen to their customers. Please help us persuade these companies to put some pressure on IP's CEO, John Faraci. Already Seventh Generation, Ben & Jerry's, Newman's Own Organics, Dan's Chocolates of Vermont and Starbucks have signed on and sent letters to IP CEO Faraci. Many new companies are joining. Our message is simple – No Test Burn of Tire Derived Fuel at IP Ticonderoga without better pollution controls (an ESP). Contact: **Green Mountain Coffee Roasters** They use vast amounts of International Paper cups and profit from their Vermont image. **(800) 545-2326** Robert Stiller, President
Mike Dupee, VP Social Responsibility
Paul Comey, VP, Environmental Affairs
paul.comey@gmcr.com
More info and contacts on the web:
www.lesspollution.org/green.htm

"No tires will be burned without a fight — a big fight!"

— Vermont Attorney General Bill Sorrell

"If this experiment is allowed to move forward, the EPA is saying that it is OK to use Vermonters as guinea pigs and put the public's health at risk for the sake of industry savings."—Senator Jim Jeffords

"If we get to that time, and I hope to God we don't, I would recommend people in Addison County stay indoors. Don't be outside during this."— John Cronin, head, American Lung Association of Vermont

"Currently, the Ticonderoga paper mill does not have industry standard pollution control devices in place. Without such pollution control devices, the public health of Vermonters would be at risk from toxic particulates and the same material would degrade the state's air and water quality. I simply will not tolerate that. I remain prepared to exhaust all available legal avenues to prevent this potentially toxic tire burn."
—VT Governor Jim Douglas



An engineer comments on the previous IP SLUDGE TEST BURN:

A little investigation into the operating conditions while this data was taken also shows that part way through the baseline test, the scrubber recirc rates and caustic makeup flows were increased significantly ... in other words, IP tried to make the caustic scrubber work harder during the knots and sludge testing than it did for some of the baseline period. Noting that the particulate matter measures dropped nearly in half during the baseline test after they kicked the scrubber up, I could speculate that the particulate matter numbers for the sludge and knots tests should have been much higher. It looks like they deliberately manipulated their air pollution control equipment to work harder/better when they ran the dirtier fuels, but then never drew attention to that fact in any of this documentation.

We need a Public Hearing on the IP Title V Air Permit: we need the truth!

Help us stay in touch and save on mailing costs by sending us your e-mail address —

We would prefer to contact you with our e-newsletter to save on costs. **Please send us an e-mail at nontoxic@sover.net with your e-mail address to keep up-to-date.**

MOST IMPORTANT: TAKE ACTION

► CONTACT: IP CEO John Faraci
PHONE: 901-419-7000 | Exec. Ast.
Email: anita.crawford@ipaper.co

► WRITE: Stephen L. Johnson
Head, U.S.E.P.A.
1200 Pennsylvania Avenue, NW,
Washington, D.C. 20460
PHONE: 202-564-4700
E-mail: johnson.stephen@epa.gov

Tired of Tires? (Yes!) Guess what? IP has a permit to burn sludge too!

International Paper Company's Ticonderoga mill's Title V air pollution permit contains a section that allows the mill to burn sludge from waste treatment plants. The permit allows the plant to mix waste treatment sludge with wood and burn up to 40 cubic yards of sludge per day. On June 21, 2006 the New York State DEC made a tentative determination to approve International Paper Company's Ticonderoga mill's application to renew its Title V air pollution permit with sludge burning included.

We are deeply concerned that sludge burning at the Ticonderoga plant will endanger the health of all downwind residents of the Champlain Valley.

Sludge Burning has been associated with increased emissions of toxic heavy metals.

Sludge Burning has been associated with increased emissions of cancer causing dioxin family compounds.

Burning sludge would be at least as dangerous as burning tires.

Vermonters were not adequately informed that the permit was up for renewal. The only public notice for the permit was placed in the Plattsburg, NY newspaper, which has very limited distribution in Vermont.

On September 6, 2006 we received a letter denying our requests that Vermonters be allowed time to comment and have a public hearing on this serious matter. The NYDEC found "no basis to conduct the public hearing. Accordingly, your requests are hereby denied." Vermont's Attorney General sent comments as well about the IP Title V air permit. Will Vermont take action?

If you are as horrified as we are about IP's blatant intention to pollute the Champlain valley and threaten our health for their profits, take the time to speak out!

CONSIDER THE FACTS — THIS TIRE BURN CANNOT BE ALLOWED!

Every other mill in the United States burning the amount of tires IP proposes to burn has an ESP! Any plant built today that wants to burn tires must install an ESP! NO ESP = NO TIRE BURN!

1 This is not about burning tires! There are arguments for and against burning tires. This is about IP-Ticonderoga installing the industry standard air pollution control device, an electrostatic precipitator (ESP) to capture the fine particulate pollution resulting from burning tires, oil, wood, sludge, etc.

If IP-Ticonderoga were built today IP would be required to install an ESP. No other plant in the U.S. burns this many tires (72 tons/day) without an ESP.

2 We want IP-Ticonderoga to continue in operation as an important employer in the Champlain valley. To that end, IP should invest in an ESP, which will ensure long term, profitable operation of the IP mill.

3 We are concerned about the health hazard posed by fine particulates, carcinogens and heavy metals. The EPA's Clean Air Science Advisory Committee urged the agency to lower annual permissible releases from 15 to 12 micrograms/cubic meter and the 24-hour permissible releases from 65 to 25 micrograms/cubic meter. The EPA administrator, Bush appointee Stephen Johnson, did lower the 24-

hour permissible releases from 65 to 35 micrograms/cubic meter. (His refusal to lower the annual permissible releases has been roundly criticized by EPA scientists and will be challenged in court.) Burning tires without an ESP may very well exceed the new 24-hour permissible releases, but the only way to know is for IP to test for these fine particulates (PM 2.5). They refuse to do so. There is broad consensus among scientists and independent experts that fine particulates are extremely hazardous and should be further regulated. There is no doubt that this will occur when the EPA administration finally listens to their own scientists. Then IP will be out of compliance.

4 If IP had been a responsible corporation three years ago when they first proposed burning tires in place of 10% of their expensive fuel oil, their savings (by IP's own estimates \$4 million/year) would have already paid for the ESP. There would be no court challenges. That was when oil was \$30/barrel. Now oil is more than \$70/barrel. IP is losing money because of their intransigence. Had they installed an ESP there would not be a legal challenge from Vermont about burning tires.

5 Everybody breathes the pollution from IP-Ticonderoga. Workers, their families, New Yorkers, Vermonters. The evidence for harm from fine particulates and heavy metals is compelling. Even one day of high exposure to particulates raises the death rate from strokes and heart attacks, and worsens lung diseases, like asthma, that so many people have. An ESP will prevent much of this suffering. We can have good jobs AND clean air.

6 We will not give up this struggle for clean air and a safe IP mill across Lake Champlain. Our children's health, our own health is too important. Does IP want to continue to struggle through expensive court battles and other delays?

7 Vermonters are united in our demand that IP install an ESP. Gov. Douglas has even offered financial aid from Vermont. PLP has gathered over 1500 petition signatures, 300 bus riders drove to Ticonderoga, New York last year to express their concerns at NY DEC hearings. At the same time that New York and Vermont are suing Midwestern power plants for interstate pollution, New York intends to send IP's pollution across Lake Champlain into Vermont.

We need your help NOW to continue...

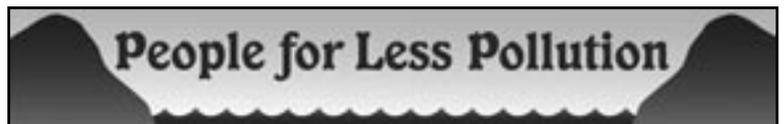
It is clear that we are now moving to the stage where a legal battle must be fought to stop the IP Tire Burn. We need to raise thousands of dollars to fight IP in court. We need your help now more than ever. Please contribute. We are all volunteers — all money goes to fighting the tire burn and protecting the environment.

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

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

(Dream Contribution) I'd like to cover the costs of your legal battle here is my check for \$20,000.

- 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.

The tires IP BURNS is the AIR YOU WILL BREATHE! — PLEASE ACT!



Call New York Governor
George E. Pataki, 518-474-1041
Tell EPA HEAD Stephen Johnson
YOU WON'T TOLERATE THIS
VIOLATION OF PUBLIC HEALTH:
1-202-564-4700 (USEPA Wash. DC)
E-Mail: johnson.stephen@epa.gov

Call the officials below—
Push them to fight harder!

- ▶ Governor Douglas: 800-649-6825
- ▶ VT Attorney Gen. William Sorrell:
1-802-828-3171 IP MUST BE
STOPPED IN COURT!
- ▶ Sen. Jeffords: 800-835-5500
- ▶ Sen. Leahy: 800-642-3193
- ▶ Rep. Sanders: 800-339-9834

Tell International Paper CEO John Faraci what you think! 901-419-7000,
901-419-4633-Fax, Tell his Exec. Ast. E-mail: anita.crawford@ipaper.com

What can you do?

Support Vermont's Legal actions against International Paper, the NYDEC and the EPA to prevent this assault on Toxic Air Standards. If the EPA were truly enforcing the Clean Air Act this Tire Burn would not take place with inferior pollution control equipment. Take 5 minutes to call the numbers at the left. Tell 5 friends to do the same. **The fight has just begun!**

Please make a CONTRIBUTION so PLP can play a part in the Legal Battle. See page 3

Green Campaign

Even if regulators don't do their jobs and the courts fail us — As consumers we can still win! International Paper makes a wide range of packing products, including the coffee cups used by Green Mountain Coffee Roasters, and the widely used Hammermill office papers. Join us as we urge "green companies" to use green products made without releasing toxic air pollution like IP plans to do. **See Page 2**

People for Less Pollution

This issue is dedicated to Senator Jim Jeffords and his work protecting Vermont's environment from damage by International Paper. Help us continue his fight.



People for Less Pollution, Inc.
a non-profit corporation established for public benefit
P.O. Box 1350 • Middlebury, VT 05753
802-352-4416
nontoxic@sover.net
www.lesspollution.org



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