

# KEEPING DIRTY ENERGY OUT OF THE CLEAN POWER PLAN IMPLEMENTATION PLANS:

**A RESOURCE CENTER FOR  
ORGANIZERS**



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# INTRODUCTION



## THE CLEAN POWER PLAN

*UPDATE: In February 2016, the U.S. Supreme Court announced their decision to stay the Clean Power Plan (CPP) pending the final resolution of appeals. In addition, the U.S.'s next president has vowed to prevent the Clean Power Plan from being implemented.*

*Despite these developments, GAIA will carry on in its Clean Power Plan work to ensure waste incineration is not incentivized as a form of renewable energy.*

The United States Environmental Protection Agency (U.S. EPA) released the Clean Power Plan (CPP) in August 2015. This plan is the **first ever national rule that will regulate carbon dioxide (CO<sub>2</sub>) emissions from coal-fired power plants**, which are currently the largest source of greenhouse gas emissions in the United States. The plan is realized through state-by-state reduction targets for CO<sub>2</sub> emissions in the energy-sector. The CPP represents a major opportunity to transition off dirty energy and toward renewable sources.

However, since 2013, the EPA has expanded a series of loopholes that undermine the efficacy of the Clean Air Act and new initiatives like the Clean Power Plan, posing a threat to both public health and the climate. Together, these loopholes allow cement kilns, power plants, industrial boilers, and other large facilities to burn coal alongside garbage and wood and call this highly polluting practice “renewable energy.”

If state Clean Power Plans treat waste burning as renewable energy or “climate-friendly,” it will encourage highly polluting cement kilns and power plants to burn waste alongside coal and other fossil fuels in order to avoid emission caps and receive climate subsidies.

This toolkit is developed for organizations working to ensure that the implementation of the Clean Power Plan results in real toxic and climate emissions reductions, and supports the development of just and sustainable local economies without incineration.

For a more detailed background on the CPP from the Environmental Justice Leadership Forum on Climate Change click [here](#)<sup>1</sup>, or from the Center for Earth Energy & Democracy click [here](#)<sup>2</sup>

To learn more on the CPP from the EPA, click [here](#)<sup>3</sup>.

# What's at stake

## The problem with incineration

### *Incineration & "Waste-to-Energy"*

The term incineration refers to various waste treatment technologies that burn commercial, residential, industrial or hazardous waste. Municipal solid waste (MSW) incineration converts discarded materials, such as paper, plastics, metals and food scraps, into a variety of waste products, including bottom ash, fly ash, combustion gases air pollutants, wastewater, wastewater sludge and heat. There are over 80 MSW incinerators in the U.S. Most of these are used to generate electricity.

Biomass incineration uses organic feedstocks such as wood chips, construction debris, forest waste, agriculture waste and municipal waste, although "biomass" is loosely applied to mixed waste streams. Biomass incinerators waste resources that would better be conserved, composted, or returned to the earth. For a full report on public subsidies for biomass Incineration, see:

<http://www.pfpi.net/wp-content/uploads/2011/06/BAP-Biomass-Projects-Report.pdf>



In recent years, the incinerator industry has tried to expand their sector by marketing their technologies as "waste-to-energy" (WTE) facilities, leveraging claims of "reduced greenhouse gas emissions" and "clean energy," to seek public subsidies. Other waste industries such as landfill gas and anaerobic digestion plants have begun to adopt the term "waste-to-energy" in order to qualify for similar subsidies. Some companies like Covanta use the term "energy from waste" (EFW).

These marketing efforts conceal the many environmental problems with WTE incinerator and landfill technologies and the loss of recyclable materials when they are burned for their Btu value rather than recycled back into the economy for a higher end use.

Burning waste has many negative environmental, social and health consequences.

- Incinerators produce a variety of toxic discharges to the air, water and ground that are significant sources of a range of powerful pollutants, including dioxin and other chlorinated organic compounds<sup>4</sup> that are well-known for their toxic impacts on human health and the environment<sup>5</sup>.
- Incinerators create toxic ash or slag that must then be landfilled. This ash contains heavy metals, dioxins, and other pollutants, making it too toxic to reuse<sup>6</sup>.
- The use of incinerators feeds a system in which a constant flow of resources needs to be pulled out of the Earth, processed in factories, shipped around the world, and burned in our communities.
- Incinerators emit significant quantities of direct greenhouse gases, including carbon dioxide and nitrous oxide, that contribute to global climate change. They are also large sources of indirect greenhouse gases, including carbon monoxide, nitrogen oxide, non-methane volatile organic compounds, and sulfur dioxide. Incinerators emit more CO<sub>2</sub> per megawatt-hour of energy than any fossil fuel-based power source - including coal-fired power plants. But their greatest contribution to climate change is through undermining waste prevention and recycling programs, and encouraging increased resource extraction.
- As the most expensive waste handling option, incinerators compete with recycling and composting for financing and materials, and they only sustain 1 job for every 10 at a recycling facility<sup>7</sup>.
- Incinerators are too often located in environmental justice communities; communities that are exposed to a disproportionate burden of pollution<sup>8</sup>. Incinerators pose considerable risk to the health and environment of neighboring communities, and even the most technologically advanced incinerators release thousands of pollutants that contaminate our air, soil and water<sup>9</sup>.



# The risks with classifying incineration as renewable energy

[Read the full report](#): “Burning Public Money for Dirty Energy” outlines how “waste-to-energy” (WTE) incinerators – the costliest and most carbon-intensive energy corporations – are poised to take advantage of taxpayer subsidies, unless fiscally-responsible judgment prevails in federal and state policy arenas.

People selling “waste-to-energy” incinerators claim that generating energy by burning trash is a win-win solution to our waste and energy crises. The truth, however, is that incinerators actually waste energy. When burning materials that could be reused, recycled, or composted, incinerators destroy the energy-saving potential of putting those materials to better use. Recycling, for instance, saves 3 to 5 times the energy that waste incinerator power plants generate.<sup>10</sup> Incinerators are also net energy losers when the embodied energy of the burned materials is taken into account.<sup>11</sup>



The consequences of classifying incineration as renewable energy include:

- Having “waste-to-energy” (WTE) counted as a “renewable” energy creates a lifeline for an expensive industry that requires public funds to gain a competitive advantage over other approaches to waste management like recycling.
- Most federal energy subsidies that benefit incineration are actually meant to support the development of real renewable energy sources such as wind, solar and micro-hydro, which should not have to compete against dirty energy for the same funding.
- Although WTE projects currently access only a portion of the renewable energy subsidies available, these policies set a precedent for increased financial support for the industry and shape the political, technological, economic, and legal environment.

[Learn more about incinerators in disguise and “myths vs. facts” on so-called “waste-to-energy”](#)

## Spotlight: Health & Environmental Justice



In 2013 the EPA approved a policy allowing facilities to process many kinds of waste (including processed municipal wastes, tires, wood, and other discards) and call it “non-hazardous secondary materials” rather than waste. In an Orwellian twist, once “waste” is no longer regulated as “waste,” then burning it in industrial boilers and process heaters is no longer considered “incineration,” and most of the related pollution control and transparency regulations established in the Clean Air Act are eliminated.

According to an analysis by Earthjustice (which sued the EPA for this decision), the reclassification of waste as “non hazardous secondary material” means that there is now no requirement of public notice to burn waste at more than 1.5 million facilities nationwide, and ninety-nine percent of industrial power plants are not subject to any emissions testing.

Burning waste is known to release POPs, endocrine disruptors, and other hazardous chemicals such as dioxin, mercury, and lead in dangerously high quantities. For example, a 2009 study in New York State found that more total mercury was emitted from the state’s 10 trash incinerators than its 8 coal plants, despite the coal plants being far larger facilities.<sup>12</sup>

Nationally, many types of waste projects are disproportionately located in poor communities or communities of color who suffer the health impacts. The future of clean energy, wind, solar and hydro powers, has the potential to benefit the communities that are currently facing the most pollution from the

*“Our Climate Justice Movement demands that clean, green, and renewable energy be made available to all Americans without regard to race, color, national origin or income. It is unlikely that we as a nation can achieve sustainability and a green energy future without addressing these equity issues.”*

*-Robert D. Bullard in [Dismantling Energy Apartheid in the United States](#)*

## Incineration in the Clean Power Plan



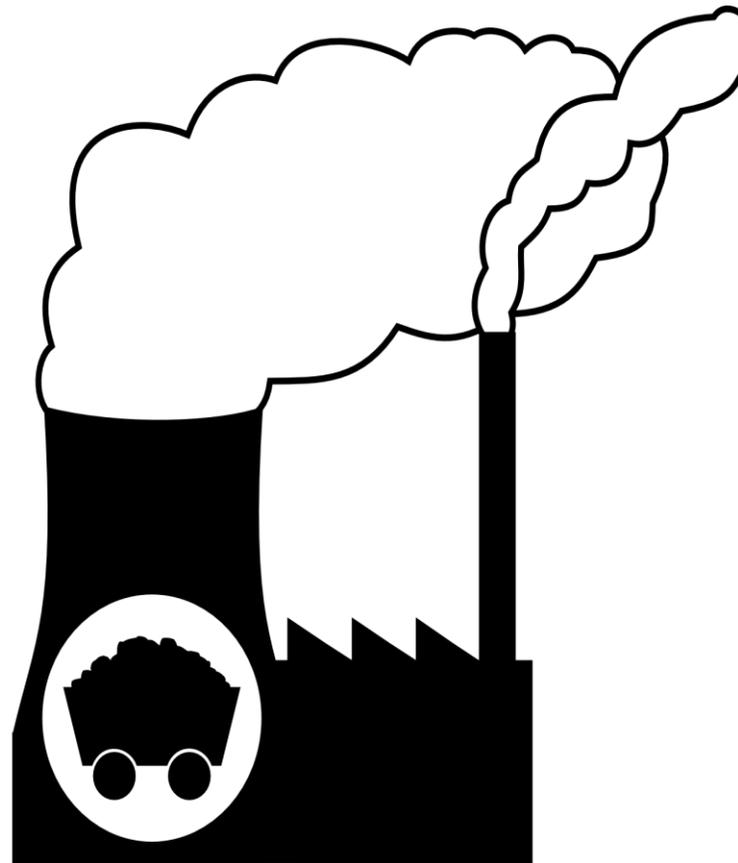
"Here in Baltimore, we are experiencing firsthand what happens when we define dirty energy as clean. In Maryland, trash incineration has been classified as renewable just like solar and wind. As a result we were threatened with the construction of the nations' largest trash burning incinerator less than a mile away from our school. It's taking years to undo the damage from this policy. We cannot afford to make the same mistake on the national level with the Clean Power Plan."

- *Destiny Watford for Free Your Voice and United Workers*

The Clean Power Plan counts the burning of biomass (including trees, wood, paper, and organic waste) as carbon neutral — effectively classifying biomass incineration as renewable energy. Climate pollution from burning plastics and other non-organic garbage must be counted as causing climate change— but in most cases, biomass is burned with mixed waste like plastic, effectively privileging all forms of waste burning. Any incentives for burning organic waste mean more garbage incineration overall.

This assumption of carbon neutrality for biomass has far-reaching consequences for climate policy. In total, incinerators emit 41 million tons of carbon dioxide each year. Per megawatt hour, waste incinerators release 2.5 times more carbon dioxide than coal-fired power plants. This is particularly concerning given that the majority of coal plants being converted to a new fuel are converted to biomass. If state CPPs treat biomass as carbon neutral, this would incentivize increased conversion from coal to biomass.

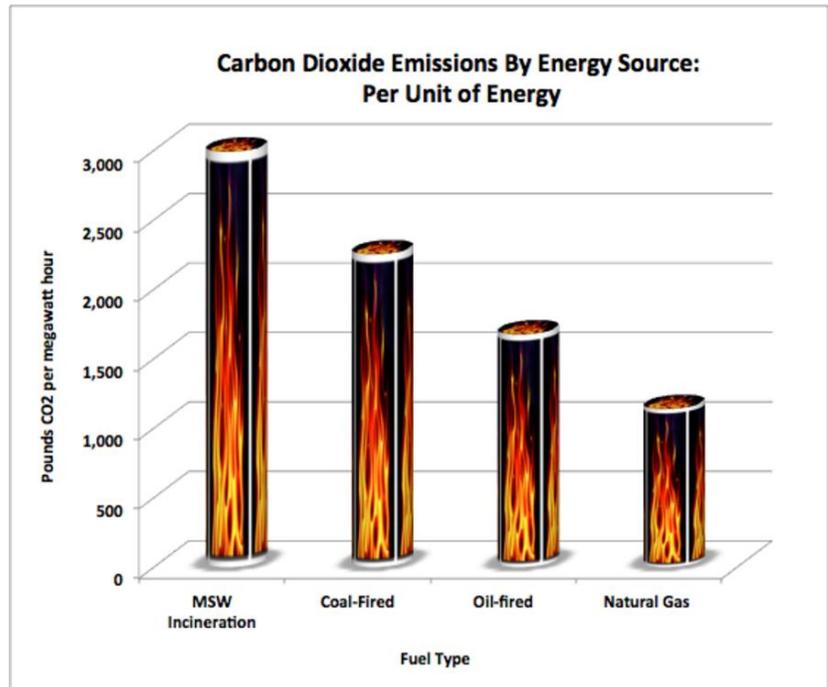
The EPA has justified carbon neutrality for biomass based energy largely on the assumptions that (1) trees and plants that are burned now are replaced with new growth over the coming decades, and (2) that when trees decompose they naturally release methane as they would when being burned.



There are a number of problems with both these arguments—most importantly, the rate at which organic matter is being burned far outpaces the rate at which it grows back or decomposes naturally. Given the urgency of the climate crisis we are facing, it is clear that states need to be cutting down on emissions of greenhouse gas entering the atmosphere, rather than using faulty calculations to justify increased emissions.

In addition to the greenhouse gas contributions of burning biomass alone, in 2013 the EPA passed a policy that created a major new loophole for burning coal. Under the industrial boiler and heater rule, coal-burning facilities can now qualify as biomass plants even if they only get 15% of their energy from biomass. This means that a facility can burn 15% biomass and 85% coal, and receive credit as a renewable energy source.

There are interesting qualifications for states planning to include waste incineration in their plans. First, the electricity capacity must be from 2012 or later, which excludes nearly all existing incinerators, but could lead to new incinerators being built. Second, a state would have to make a plan for increasing waste reduction, reuse, recycling and composting.



\*This chart was created using EPA data which account for combustion emissions only. These figures do not include the emissions from the extraction or processing of these fuels. [Source: EPA 2014.](#)

A significant improvement in the final CPP is a required Environmental Justice Analyses of state implementation plans, which has benefits for people living near incinerators as well as all communities overburdened by climate and toxic pollution. [See the Environmental Justice Leadership Forum on Climate Change for more information.](#)

# What we can learn from existing state incentives for Waste & Biomass Burning

## Existing state incentives for Waste & Biomass Burning

Grassroots victories for environmental justice are threatened by the incineration industry rebranding itself as a renewable energy solution and securing climate subsidies. From Los Angeles to Detroit to Baltimore, state and federal subsidies for incineration are among the biggest barriers to community victories against facilities. In Michigan, the Detroit incinerator is kept alive—despite years of grassroots organizing—through the climate funding it receives.

### *On the Federal Level*

There are currently numerous federal subsidies for waste and biomass burning that allow many incinerators to stay financially afloat. It is important to recognize these so that these same misguided policies do not get transferred to policies on the state level.



**Burning trash and biomass is a climate disaster.**

**#DontBurnIt**

The following are the most direct and substantial federal policies that encourage incinerator projects as “waste-to-energy”:

1. Renewable Fuel Standards (RFS)
2. Federal Renewable Electricity Production Tax Credit (PTC)
3. Business Energy Investments Tax Credit (ITC)
4. U.S. Department of Treasury - Renewable Energy Grants
5. Advanced Manufacturing Tax Credit (MTC)
6. Renewable Energy Production Incentive (REPI)
7. Energy Efficiency and Conservation Block Grant Program (EECBG)
8. Clean Renewable Energy Bonds (CREB's)
9. Qualified Energy Conservation Bonds (QECB's)
10. U.S. Department of Energy - Loan Guarantee Program
11. U.S. Department of Agriculture - Rural Energy for America Program (REAP) Grant
12. U.S. Department of Agriculture – Biorefinery Assistance Program N

To find out more about these federal subsidies, read GAIA's 2011 report: [Burning Public Money for Dirty Energy Misdirected Subsidies for "Waste-to-Energy" Incinerators.](#)

### *On the State Level*

State Renewable Portfolio Standards are currently the Renewable Energy Program that has the largest impact on both existing and proposed incinerators.

With the failure of federal climate legislation in 2009, and the absence of a federal renewable electricity standard, state renewable portfolio standards (RPS) are now the governing regulatory programs that mandate the production of "renewable energy." Taxpayer and ratepayer subsidies make it possible for the mandates to be fulfilled by providing the funding to build and operate new renewable energy sources.

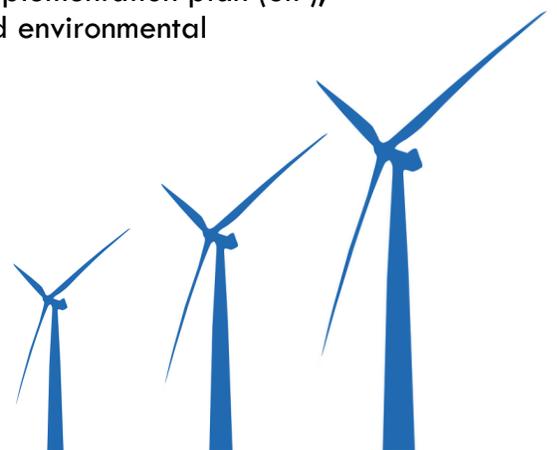
The RPS is one of the biggest drivers of alternative energy. Compliance with these standards takes various forms, but in general are legal requirements that a certain percentage of electricity produced in a state be from "renewable" sources. State programs define qualifying technologies differently, or in varying classes. Qualifying facilities are authorized to sell electricity and "renewable energy credits" (RECs), with each qualifying facility being awarded one REC per MWh of power produced each year.

As of November 2015, 29 states in the US have established RPS, and 16 of those include incineration (as "waste to energy") in their renewable energy definition. It is likely that as states create SIPs for the CPP, they will likely create RPS as a way to meet the regulations laid out in the CPP.

## What does strong implementation of the CPP look like?

Strong implementation of the Clean Power Plan will include policies that reduce pollution burdens on low-income communities and communities of color already overburdened with climate and toxic emissions. These new policies should also have direct benefits for those on the frontline of the climate crisis. States must undertake a robust community engagement process and directly engage environmental justice stakeholders in development of their state implementation plan (SIP), and should also perform an assessment of the local air quality and environmental impact of their SIP.

Strong implementation of the CPP will also prioritize conservation, energy efficiency, and non-polluting renewable energy opportunities. This means that SIPs should not include waste-to-energy incineration or biomass incineration, in either rate or mass-based plan approaches. Stakeholders must be proactive in ensuring that their state's plan does not incorporate waste-to-energy incineration. Strong SIPs will also ensure pathways to a clean energy economy, and a just transition for workers and communities impacted by dirty energy industries.



Finally, the EPA acknowledges the importance of waste reduction in the CPP, citing Oregon and Vermont as strong examples of states “that emphasize waste prevention, followed by reuse, then recycling and composting materials prior to treatment and disposal.” While we maintain the position that waste-to-energy incineration not be included in state’s implementation plans, we also want to emphasize how important it is that state’s “strengthen existing or implement new waste reduction, reuse, recycling and composting programs”.

## Resources for Organizers

### [The Wildfire Project](#)

The Wildfire Project (Wildfire) trains, supports, and links grassroots groups, laying the foundation for a powerful movement toward political, economic, and ecological justice. aid people in many ways to foster

### [A Force More Powerful—198 Methods of Nonviolent Action](#)

Practitioners of nonviolent struggle have an entire arsenal of "nonviolent weapons" at their disposal. Listed below are 198 of them, classified into three broad categories: nonviolent protest and persuasion, noncooperation (social, economic, and political), and nonviolent intervention

### [Joshua Kahn Russell - Resources for Organizers](#)

A compilation of resources for organizers

### [The Ruckus Society](#)

The Ruckus Society provides environmental, human rights, and social justice organizers with the tools, training, and support needed to achieve their goals.

### [Movement Generation](#)

Movement Generation Justice & Ecology Project inspires and engages in transformative action towards the liberation and restoration of land, labor, and culture. We are rooted in vibrant social movements led by low-income communities and communities of color committed to a Just Transition away from profit and pollution and towards healthy, resilient and life-affirming local economies.

### [Center for Story Based Strategy](#)

The Center for Story-based Strategy (CSS) is a national movement-building organization dedicated to harnessing the power of narrative for social change. We offer social justice networks, alliances and organizations the analysis, training and strategic support to change the story on the issues that matter most.

### [Training for Change](#)

Training for Change builds capacity for powerful training and education among activists and organizers.

### [Organizing for Power](#)

This website is full of resources for organizers, activists, students, journalists, or anyone trying to learn about creating positive social change.

### [School for Unity and Liberation \(SOUL\)](#)

SOUL is working to lay the groundwork for a strong social justice movement by supporting the development of a new generation of organizers rooted in a systemic change analysis -especially people of color, young women, queer and transgender youth and low-income people.

### [Build the Wheel](#)

Search for workshops and curricula by topics, description, authors, language and more.

### [The Community ToolBox](#)

The Community Tool Box is a free, online resource for those working to build healthier communities and bring about social change. Our mission is to promote community health and development by connecting people, ideas, and resources.

### [Highlander Research and Education Center](#)

Highlander serves as a catalyst for grassroots organizing and movement building in Appalachia and the U.S. South. Through popular education, participatory research, and cultural work, we help to create spaces — at Highlander and in local communities — where people gain knowledge, hope and courage, expanding their ideas of what is possible.

### [Starhawk's Activist Resources \(The Change Agency\)](#)

Resources authored by Starhawk featuring writings on activism and resources for trainers.

### <http://neworganizing.com/projects>

Explore the different links to find trainings and presentations on different aspects of organizing. Includes crafting your personal story, recruiting for your cause, building relationships, facilitating meetings, using new media and more.

### <http://www.ibiblio.org/netchange/cc/>.

An organizing guide for peace and justice groups, but applicable to any other issue. Includes starting a group, planning an event, planning a campaign, campus publicity techniques, media and press releases, and more.

### <http://www.citizenworks.org/tools/campus/tools-campus.php>

All the basics of organizing including building your base, running a meeting, executing a campaign and utilizing the media.

### [http://democracymatters.org/index.php?option=com\\_content&view=article&id=148%3Adownloadable-materials&catid=46&Itemid=65](http://democracymatters.org/index.php?option=com_content&view=article&id=148%3Adownloadable-materials&catid=46&Itemid=65)

Tips for people organizing around getting money out of politics, but applicable to other issues. Scroll around to find the links most useful to you! Includes lobbying your elected official, organizing a SMART campaign, holding film screenings and using social media.

<http://www.abilitymaine.org/rosc/cog.html>

A community organizer's guide to help you start and develop a group, publicize your cause, hold events, build coalitions and more.

<http://www.britell.com/text/OrganizeToWin.pdf>

A grassroots activist's handbook including researching, organizing a campaign, preparing for meetings, motivating others, using the media, and much more.

<http://chej.org/assistance/organizing/>

Provides guides and one-on-one assistance for people who want to start community organizing. Includes everything from using the media to having fun! Also has guides for specific campaigns around getting better stuff and changing the way our stuff is made. Spend some time exploring the site- there's lots to look at.

*These are guides for women organizers, but totally apply to men too. They're focused on social justice organizing and emphasize inclusion, especially of traditionally oppressed groups:*

<http://girlsactionfoundation.ca/en/start-something-fierce-a-young-womans-guide-to-grassroots-organizing> and <http://girlsactionfoundation.ca/en/zine-dreams-to-action-2005>

Get information on topics like collaboration, leadership styles, fundraising, anti-oppression organizing, evaluation, communications, and growing your project. In addition, there are also inspiring stories, tips, and further resources.

<http://girlsactionfoundation.ca/en/zine-make-some-noise>

This toolkit is packed with inspiration, skills and resources to help you create your own media projects that will make a difference. Use the power of media arts to speak out about issues that matter to you. You will find a "how to" section, profiles about young women taking action, and resources to help you get started

<http://girlsactionfoundation.ca/en/zine-step-it-up-the-young-womens-guide-to-influencing-public-policy>

This guide introduces the policy process and gives ideas for how to influence public policy at the municipal, provincial and national levels

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Tips for people organizing around getting money out of politics, but applicable to other issues. Scroll around to find the links most useful to you! Includes lobbying your elected official, organizing a SMART campaign, holding film screenings and using social media.

<http://www.britell.com/text/OrganizeToWin.pdf>

A grassroots activist's handbook including researching, organizing a campaign, preparing for meetings, motivating others, using the media, and much more.

<http://www.heartsandminds.org/articles/lobby.htm>

This is an article from Common Cause on how to lobby your elected officials, including contacting someone for a meeting to writing letters to the editor. Also connects you with contact information for your representatives.

[http://democracymatters.org/index.php?option=com\\_content&view=article&id=148%3Adownloadable-materials&catid=46&Itemid=65](http://democracymatters.org/index.php?option=com_content&view=article&id=148%3Adownloadable-materials&catid=46&Itemid=65)

Democracy Matters provides a handout on lobbying your elected official- scroll down until you find it!

<http://www.britell.com/text/OrganizeToWin.pdf>

A full grassroots activists' handbook... scroll down until you find "the secret of successful lobbying!"

[http://www.mbf.org/fundamentals\\_for\\_effective\\_lobby.htm](http://www.mbf.org/fundamentals_for_effective_lobby.htm)

A handout on the fundamentals of effective lobbying.

<http://girlsactionfoundation.ca/en/zine-step-it-up-the-young-womens-guide-to-influencing-public-policy>

This guide introduces the policy process and gives ideas for how to influence public policy at the municipal, provincial and national levels

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Endnotes

<sup>1</sup>Environmental Justice Leadership Forum (2016). *Clean Power Plan Tool Kit*. Retrieved 8 February 2016, from [http://www.ejleadershipforum.org/wp-content/uploads/2015/07/DRAFT\\_Module-1\\_What-is-the-CPP.pptx](http://www.ejleadershipforum.org/wp-content/uploads/2015/07/DRAFT_Module-1_What-is-the-CPP.pptx)

<sup>2</sup>Center for Earth Energy & Democracy (2016). *CPP Workshop*. Retrieved 8 February 2016, from <http://ceed.org/cpp-workshop/>

<sup>3</sup>Environmental Protection Agency (2016). *EPA Clean Power Plan for Existing Power Plants*. Retrieved 8 February 2016, from <http://www2.epa.gov/cleanpowerplan/clean-power-plan-existing-power-plants>

<sup>4</sup>Waste Incineration and Public Health (2000), Committee on Health Effects of Waste Incineration, Board on Environmental Studies and Toxicology, Commission on Life Sciences, National Research Council, National Academy Press, pp. 6-7.

<sup>5</sup>Howard, C.Vyvyan, Statement of Evidence, Particulate Emissions and Health, Proposed Ringaskiddy Waste-to-Energy Facility, June 2009

<sup>6</sup>Römbke, J., et al. Ecotoxicological characterisation of 12 incineration ashes using 6 laboratory tests. *Waste Management*, 2009.

<sup>7</sup>Tellus Institute, *More Jobs, Less Pollution: Growing the Recycling Economy in the United States*, 2011. [www.recyclingworkscampaign.org](http://www.recyclingworkscampaign.org)

<sup>8</sup>Mohai, Paul, "Reassessing Racial and Socioeconomic Disparities in Environmental Justice Research," 2006, *Demography*, 43 (2), 383-399

<sup>9</sup>Ibid

<sup>10</sup>Morris, Jeffrey, Comparative LCAs for Curbside Recycling Versus Either Landfilling or Incineration with Energy Recovery, *The International Journal of Life Cycle Assessment*, July 2005. Available at: <http://www.springerlink.com/content/m423181w2hh036n4/>

<sup>11</sup>Fichtner Consulting Engineers Limited, *The Viability of Advanced Thermal Treatment in the UK*, 2004, p.4.

<sup>12</sup>NY Department of Conservation, Comments to New York State Public Service Commission in the Matter of the application of Covanta Energy Corporation, August 19, 2011.