



November 8, 2007

Dear Senator or Representative:

I am writing on behalf of the Integrated Waste Services Association (IWSA) to correct information distributed recently by opposition groups with respect to waste-to-energy. Misrepresentations and inaccuracies are being used as the basis to exclude waste-to-energy in the 2007 energy bill. We believe that when all available factual information is considered, lawmakers and policymakers will conclude that waste-to-energy is a clean, renewable energy source and that polices aimed at reducing greenhouse gases and fossil fuel consumption should include waste-to-energy.

The 87 waste-to-energy plants in the United States have an installed baseload electric capacity of 2,700 megawatts through the combustion of household trash which is both sustainable and indigenous—the two basic criteria for identifying renewable energy sources. Recognizing waste-to-energy as renewable in the energy bill would not set new precedent. To the contrary, excluding waste-to-energy would erase nearly thirty years of precedent recognizing waste-to-energy as a valuable alternative energy source worthy of federal support. Along with wind, solar, geothermal and biomass, waste-to-energy was provided incentive in the Public Utility Regulatory Policies Act of 1978 in order to increase the use of alternative energy supplies to combat the energy crisis of the 1970s. Recognizing that all renewable energy resources are necessary to reduce our dependence on fossil fuels, Congress has consistently defined waste-to-energy as renewable in federal statutes including the Federal Power Act, Pacific Northwest Power Planning and Conservation Act, the Biomass Research and Development Act of 2000, the Internal Revenue Code, and the Energy Policy Act of 2005. Executive orders in the Clinton and Bush administrations provided the same recognition.

The following is our response to the erroneous information currently being circulated on Capitol Hill:

Error: The Integrated Waste Services Association falsely claims that 23 states include waste-to-energy in their Renewable Electricity Standards.

Fact: Opposition groups misunderstand information circulated by IWSA, which accurately states that waste-to-energy is defined as renewable in 23 states and the District of Columbia. Not all of the state statutes in which waste-to-energy is defined as renewable are renewable portfolio standards.

Error: Twelve states explicitly exclude waste-to-energy technology as renewable energy sources under their Renewable Portfolio Standards (RPS).

Fact: Eleven states and the District of Columbia explicitly include waste-to-energy in their renewable portfolio standards. Not surprisingly, some state RPS's do not include waste-to-energy since sparse populations and high land availability makes it unlikely that

a waste-to-energy facility would ever be sited in some states.

Error: Minnesota does not include waste-to-energy in its RPS.

Fact: The Minnesota RPS includes waste-to-energy by incorporating, without limitation, “an energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste as a primary fuel.”¹

Error: Waste-to-energy is a dirty source of power.

Fact: EPA states that waste-to-energy produces electricity “with less environmental impact than almost any other source of electricity.”² Opposition groups fail to acknowledge that waste-to-energy facilities employ maximum achievable control technologies to reduce emissions allowing them to meet, and in most cases operate far below, stringent state and federal standards. According to data five years more recent than what opposition groups cite, the 87 waste-to-energy plants nationwide emitted only 15 grams of dioxin TEQ in 2005.³ Ironically, opposition groups seek to exclude waste-to-energy facilities from the energy bill because they emit mercury and dioxin, yet they support inclusion of other combustion sources which also emit mercury and dioxin. A double standard has been employed.

Error: Waste-to-energy plants contribute to global warming.

Fact: Opposition groups selectively include part of the findings from an International Panel on Climate Change report.⁴ Revealing a clear bias, they disingenuously omit the conclusion of the report that states very clearly that waste-to-energy is considered “climate neutral” due to emission credits from the power plant mix. In addition, an EPA report on solid waste management shows that today’s waste-to-energy prevents the release of nearly 30 million tons of carbon dioxide equivalents per year through the avoidance of methane emissions from landfilling and carbon dioxide emissions from power generation and metals production that would have been released if the waste had not been processed at a waste-to-energy facility.⁵

Error: Recycling of municipal solid waste should always be favored over waste-to-energy.

Fact: Opposition groups want you to choose between recycling and waste-to-energy when, in fact, all options need to be employed in an integrated solid waste management system. IWSA encourages and supports community programs to reduce, reuse, recycle and compost waste. However, after waste is reduced, reused, and recycled, waste will be leftover that must be managed and EPA’s solid waste hierarchy states that waste-to-energy is preferable to landfilling.⁶ Highlighting the compatibility of waste-to-energy and recycling is the fact that the recycling rates of communities that utilize waste-to-energy plants are nearly twenty percent greater than the national average. In addition, the nation’s waste-to-energy plants recycle more than 700,000 tons of ferrous metals per year—enough to construct 10 skyscrapers the size of the Sears Tower.

I urge you to promote the use of waste-to-energy in the energy bill and take advantage of this abundant homegrown energy source. With the help of waste-to-energy, you can

promote energy independence, reduce greenhouse gas emissions, and support the communities that rely on this important technology.

Sincerely,



Ted Michaels
President
Integrated Waste Services Association

¹ Minnesota Statutes 2006, section 216B.1691.

² USEPA letter from Assistant Administrators Marianne Horinko, Office of Solid Waste and Emergency Response, and Jeffery Holmstead, Office of Air and Radiation to IWSA, 2/14/03

³ Memorandum entitled “Emissions from Large and Small MWC Units at MACT Compliance” from Walt Stevenson, EPA Office of Air Quality Planning and Standards, to the Large MWC Docket, August 10, 2007.

⁴ IPCC, “Emissions From Waste Incineration” http://www.ipcc-nggip.iges.or.jp/public/gp/bgp/5_3_Waste_Incineration.pdf

⁵ Susan Thorneloe (EPA), Keith Weiss (Research Triangle Institute), and Maria Zannes (IWSA), *The Impact of Municipal Solid Waste Management on Greenhouse Gas Emissions in the United States*, Air & Waste Management Journal, ISSN 1047-3289 (2002).

⁶ EPA’s solid waste hierarchy can be found online at <http://www.epa.gov/msw/faq.htm#1>. The EU solid waste hierarchy can be found online at <http://ec.europa.eu/environment/waste/strategy.htm>.