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CARRIGALINE AREA FOR A SAFE ENVIRONMENT PO Box 10 Carrigaline Co Cork

Submission on Behalf of Carrigaline Area for a Safe Environment to Environmental Protection Agency Oral Hearing, 14th February, 2005

Re/ Determination of Proposed Waste Licence (reg No 186 – 1) Issued to Indaver Irl, Ringaskiddy, Co Cork by the Environmental Protection Agency, October 26th, 2004

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Carrigaline Area for a Safe Environment (CASE) wish to make this submission in conjunction with our written submission seeking an Oral Hearing.

In our written submission we referred to the EPA mandate which is:

'To protect and improve the natural environment for present and future generations, taking into account environmental, social, and economic principals of sustainable Development.' (EPA Website, November 2004)

Therefore the EPA has a duty and a responsibility under its mandate to protect the influences surrounding and affecting the development of all residents – present and future adults, children and babies – of Cork Harbour.

Building an incinerator in the proposed Ringaskiddy site does not support the stated mandate, and building an incinerator at this stage, before intensive waste prevention and full recycling principals and safer, more modern residual treatments have been implemented does not conform to the principle of sustainable development.

- CASE seeks reimbursement of costs under Article 6 of the European Convention on Human Rights.
- CASE requests the withdrawal of the two premature draft licences given to Indaver by the E.P.A. plus the introduction of a Moratorium on the introduction of Mass Burn Incineration into Ireland so the many alternatives coming on line everyday can be tried and tested, in conjunction with Clean Production.
- Ireland is in the lucky position of being clean and green, staying that way is our future not hosting the kind of dirty Industry that follows the introduction of Toxic/Hazardous Mass Burn incineration into a country.

Later those charged with protecting Ireland, but instead took the 'quick fix' route under the cloak of immunity may find rules change when those coming behind us want to know why their heritage is a polluted mess.

Ireland is too small for Mass Burn Incineration.

We object to the use of technology that is not Best Available Technology (BAT) and of a disposal method that is no longer Best Practice (BP) and outline Alternatives Below.

ALTERNATIVES

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Firstly, a comprehensive solution to our hazardous waste problems must include demands on Industry and Government and the relevant Regulatory Authorities for waste reduction and *clean* production – a stop or phasing out of hazardous waste and so therefore a good alternative non-burn technology to incineration is one that will only be used temporarily and/or as a final resort.

Many of the past planning proposals for HWI (Hazardous Waste Incineration) were specifically to do with disposal of stockpiles of difficult wastes e.g. PCB, chemical weapons, pesticides, POPs etc. As we in Ireland have no such stockpiles and no great heavy, dirty industry to speak of, there is little justification for this proposal to speak of.

There are numerous examples of opposition groups changing the course of policy makers in relation to incineration as a treatment option.

One example is in Idaho US where local environmental opposition groups threatened to sue the Dept of Energy in the US in 1999 over the plans to build 2 incinerators treating mixed low-level radioactive waste -some of it as a stockpile material.

An out of court settlement was reached whereby the Dept of Energy agreed to reconsider its plans and created a panel of experts to investigate emerging alternative technologies to incineration for this mixed waste. So far seven promising technologies have been put forward and are at present undergoing through evaluation.

Again in the US, in response to a public outcry against incineration as a means of disposal of chemical weapons, Congress mandated a program to identify and evaluate alternatives for this waste in 1996. With the result that in 2000 the US EPA issued a comprehensive report to the Dept of Defense assessing the applicability of non-burn technologies for this waste stream. This program was fully endorsed by the UN FAO and the UNEP. (UN Food & Agriculture Organization)

The latest information to come out from this research program was the announcement in March 2002 of the US Dept of Defense choice of treatment for its stockpiles of mustard agents which was a water neutralization-bioremediation technology.

This is an example of implementation of the BATNEEC principle in that this was the 'best available technology' and also the more 'cost-effective' approach, as on implementation it was also discovered to be more cost-effective than incineration.

Such non-burn technologies include:

- Biodegradation
- Electrochemical Oxidation. (Silver II and Ceric Oxide)
- Gas phase chemical reduction-GPCR

- Supercritical Water Oxidation
- Wet Air Oxidation
- Alkaline hydrolysis

Gas Phase Chemical Reduction for a Variety of Wastes

To date commercial GPCR (Gas Phase Chemical Reduction) technology has been developed and patented, and it has been tested and evaluated by the USEPA. Commercial, full-scale stationary units are in operation in Australia and Ontario, Canada plus portable demonstration units are in operation in Japan, Canada and the US.

The process can effectively treat a variety of liquid wastes, chlorinated or non-chlorinated and is also effective for a variety of matrices including soil, sediment, sludges, waste oils, watery wastes and bulk solids.

This technology is currently under review by the UN for POP destruction and the Department of Defense for chemical waste destruction.

Alkaline Hydrolysis for Meat & Bonemeal Waste

Meat and Bonemeal waste is a big national problem costing millions in storage and disposal overseas and a waste which Indaver intend to burn in Ringaskiddy. Favoured for its high calorific value, there is a highly effective alternative to incinerating meat and bonemeal.

The alternative to incineration of this type of material is an alkaline digestion process called Alkaline Hydrolysis. This is most effective for bovine waste i.e. meat and bonemeal and animal by-products, hospital anatomical waste and chemotherapy waste. The alkaline also destroys fixatives in this type of waste e.g. formaldehyde or Glutaraldhyde.

The process involves the waste loaded into an hermetically seals unit and alkaline added proportionate to the amount of waste (alkaline being-Sodium hydroxide or potassium hydroxide). Digestion is then carried out at 110°C and 100psi and can take up to 3-6 hours for completion.

Units can vary in size (14kg - 3,500 kg). By-products are biodegradable i.e. bones and teeth which are sterile, and an aqueous solution of peptide chains, amino acids, sugars, soaps and because the process hydrolyses proteins BSE infected material and any infectious material i.e. prions can also be safely degraded.

Due to concern about incineration of this type of waste, the EU Scientific Steering Committee actually conducted a study into this means of disposal. The report was finalized last Nov 2003 with a seal of approval. **Incineration by contrast has never being scientifically validated as a disposal method**. Alkaline Hydrolysis is the preferred method of disposal by veterinary colleges in the UK and the USA to date. This treatment can also be coupled to an Anaerobic digester.

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Liquefaction for Plastics

Currently the Japanese are engaged in liquefaction of plastics back to their original petrochemical state (i.e. fuel grade oil). The Corporation involved in this project is made up of the Japanese Government Industrial Development Lab; Mobil Oil Corp and Fuji Recycle, with recent engineering developments supplied by Nippon Steel and the Clean Japan Centre.

Plastics which can be treated/liquefied are Polyethylene, Polypropylene and polystyrene. Exceptions to this process are PVC or any high Specific Gravity plastics. New catalysts patented by Mobil oil to facilitate in the catalytic process can also render this process useful for the recycling of rubber.

Liquefaction has the advantage over incineration of being commercially viable at lower quantities. In addition these systems can also be built on a modular basis, which means they can be built for current demand, and added to later if demand increases, while remaining cost effective. Plants processing 5000tns/yr are currently operating in Japan together with a number of smaller units.

Orders have been placed by a Portuguese company for 10 liquefaction plants, with the first deliveries taking place January 2004. Portugal like Ireland has no commercial incineration capacity.

Centralised Anaerobic Digestion for Agricultural Waste

Since Indaver intend to burn some sludges a viable alternative to this is CAD Centralised Anaerobic Digestion. This is an established mature technology with full-scale implementation and experience in countries like Sweden, Denmark, Italy, Belgium and other northern hemisphere EU countries

The benefits include the production of a biogas to be used for CHP (Combined Heat and Power) plant, liquid fertilizer and a fibre compost material. CAD also satisfies the criteria of 'Waste to Energy'.

As well as managing farm waste CAD had the added advantage of processing all sludges, abattoir waste and bio-wastes which cannot be composted. With the introduction of IPC licensing for pig slurry CAD is the best and most sustainable solution as it satisfies the criteria for sustainable energy, prevents eutrophication of lakes and rivers and is best practice for nutrient management.

The *EPA report No 16 Feasibilility Study* for Centralised Anaerobic Digestion of various wastes and wastewaters in sensitive catchment areas Final Report 2002 indicated three counties as potential sites for CAD, of which Cork County is included, due to farming practices and generation of potential feedstock.

Currently the EPA have declared it a win-win solution for farming, our Kyoto targets and the environment in a recent report, *Anaerobic Digection: Benefits for Waste Management, Agriculture, Energy and the Environment.*

A.3 Waste Acceptance: Incineration Plant

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Fluidised Bed Incineration Plant			
Maximum annual q	uantify to be a	ecepted shall not exceed: 10	0.000 tonnes.
Waste Type	European Waste Catalogue (EWC) ^{Nosel}	DESCRIPTION	Nominal Tonnes per Annum
Hazardous Waste			
Waste oil	13 00 00	Oil and fuel wastes.	45
Oil filters	15 02 12 16 01 07	Waste Oil filter.	5
Oil/sand mixtures or mixtures of oil and other material	13 05 01 15 05 08 15 02 02	Mixtures from grit chambers and oil/water separators.	20
Wood preservation waste	03 00 00	Waste from wood processing and production and processing of pulp, paper and cardboard.	10
Wastes from petroleum refining, natural gas purification and pyrolytic treatment of coal	05 00 00	Waste oils, tars and sludges from refining operations.	20
Wastes from inorganic chemical processes	06 00 00	Inorganic chemical process waste including spent activated carbon.	900
Wastes from organic chemical processes	07 00 00	Wastes from the MFSU of organic chemicals including chlorinated non-chlorinated solvents and aqueous washing frouids.	40,000
Agrochemical wastes	02 01 08 For	Obsolete products and off specification batches.	100
Infectious Healthcare Waste Healthcare Waste	18 01 01 18 01 02 18 01 02 18 01 04 18 02 01 18 02 02 18 02 03 18 09-00	Wastes from the treatment, diagnosis or prevention of disease in animals or humans.	100
Paint, inks, adhesives and resins	08.03.00	Waste paint, inks and aqueous ink/paint solutions.	800
Waste packaging, absorbents, filters and protective clothing	15 00 00	Hazardous packaging, filters, absorbents and projective clothing.	2,000
Off specification batches containing organic or inorganic wastes	16 03 03 16 03 05	Waste pharmaceutical products.	2,000
Commercial wastes	20 01 00	Wastes including solvents, paints, inks and medicines from industries and institutions.	2,000
Sludges from physio- chemical treatment plants	19 02 05	Sludges containing dangerous substances.	2,000

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Non-Hazardone			
Weste			
Wasie			
BIODEGRADABLE	i		
WASIE	20.01.38		
wood and wood	20 01 36		
Paper and paper products	20.01.01		
Vegetable Matter	20 01 08		
Non-infectious health-	18 01 04		
care waste	18 02 01		
	18 02 03		
Street cleaning residues	20 03 03		
Gully emptyings	20 03 99		
Septic tank sludge	20 03 04		
Food stuffs	02 00 00		
Vegetable oil	20 01 25		
Oil and fat	20 01 26	· · · · · · · · · · · · · · · · · · ·	
Animal faeces, urine and	02 01 06		
manure (including			
spoiled straw) effluent,			
collected separately and			
treated off-site			
Animal blood	18 02 03		
Sludges from treatment	19 08 05	1 ⁵⁰ .	
of urban waste water	19.02.06		
sludges from	19 02 00	and and	
treatment other than		OTLATA	
those mentioned in 19 02		Se Ato	
05		aur Pourice	
Wastes from aerobic	19 05 00	OR XIES	
treatment of solid waste		ectic sher	
Wastes from aerobic	10 06 00	HIS AL	
treatment of waste		5 5180	<u> </u>
Wastes from the	02 02 02	Log '	
preparation and	x o		а.
processing of meat, fish	osett.		
and other foods of	Cor		
animai origin	16 01 03		
Other wastes (including	19 12 12	······································	
mixtures of materials)			1
from mechanical			
treatment of wastes other			
than those mentioned in			
19 12 11			
	·		

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Moving Grate Incin	eration Plant
Maximum annual quantity to be accepted	shall not exceed: 100,000 Tonnes.
Waste Type	European Waste Catalogue (EWC)
Wood and wood products	20 01 38
Paper and paper products	20 01 01
Vegetable Matter	20 01 08
Non-infectious health-care waste	18 01 04
	18 02 01
	18 02 03
Street cleaning residues	20 03 03
Gully emptyings	20 03 99
Septic tank sludge	20 03 04
Food stuffs	02 00 00
Vegetable oil	20 01 25
Oil and fat	20 01 26
Animal faeces, urine and manure (including spoiled	02 01 06
straw) effluent, collected separately and treated off-site	
Animal blood	18 02 03
Residual Municipal Waste Notes 1 & 2	20 03 01
Sludges from treatment of urban waste water	19 08 05
Sludges from physico/chemical treatment other than	19 02 06
those mentioned in 19 02 05	
Wastes from aerobic treatment of solid waste	19 05 00
Wastes from aerobic treatment of waste	10 06 00
Animal-tissue waste	02 02 02
End of life tyres	1601.03
Other wastes (including mixtures of materials) from	49,1212
mechanical treatment of wastes other than those mentioned in 19 12 11	equit.

Note 1: Household waste (as well as commercial and other waste, which because of its nature or composition, is similar to household waste) that, in so far as is practicable, has been pre-sorted or segregrated to remove reusable and recyclable materials.

materials. Note 2: Residual Municipal waste may also be incinerated in the fluidised bed incinerator after the moving grate incinerator has commenced operations.

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riulaized Bed Pla	int		
waste type		Alternative treat	ment
Waste oils		Remediation & filtration, re-cycled Bio fuel	filtration, centrifugal d as lower grade oils.
Oil Filters		Recovery, re-use	Sustainable
Oil Sand mixtures		Separation and	d
Wood preservation wastes		GPCR Gas phase Chemical Reduction/Base Catalysed Dechlorination Re use. Low grade	Clean Production
Wastes from petroleum refining, natural gas purification, and pyrolytic treatment of coal	For	GPCR Gas Phase Chemical Reduction. SWO Supercritical Water Oxidation	Clean Production
Wastes from inorganic chemical processes	Consent of C	Electrochemical Oxidation-Cerium or Silver 11.	Clean Production
vvastes from organic chemical processes		Recovery abroad Solvent Recovery GPCR	Clean Production
wastes, obsolete products etc		Anaerobic digesters,	Chemical treatments, autoclaving Clean Production
Intectious medical, healthcare waste		Alkaline hydrolysis, autoclaving, microwaving	Sustainable
adhesives and resins Waste packaging		Electrochemical oxidation- Silver 11 or Cerium	Prevention, substitution, Clean production
absorbants, filters		Substitution, regeneration	Product substitution

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and protective	9	1	
clothing			redesign
Off spec. batches	3	GPCR	
containing organic			
or inorganic	>		
wastes			
Commercial		GPCR SWO	Close production
wastes, solvents			Clear production
paints, inks			
Sludges from		Wet Air Oxidation	
physiochemical		Hydrolysis	
treatment plants			
Non hazardous w	aste		<u></u>
Wood or wood		Recycling	
products, paper		remediation	
products		romoulauon,	
Vegetable matter		Composting/	
		Wormeries/ CAD	
Non infectious		Alkaline	
healthcare waste		hydrolysis	
		Anaerobic	
		digestion	
Street cleaning		Sewers	
residues		ette wither	
Gulley emptying	TING	Sewers, Wet Air	
	FOLDE	Oxidation CAD	
Septic tank sludge	. 010	Anaerobic	
	osent.	digester.	
Food stuffs	Cor	Composting.	
		wormeries.	
		Anaerobic	
		digester (AD)	
veg oil, oil and fat	_	Filtration- Low	
Amina al		Grade Bio-Fuel	
Animal taeces,		AD, composting,	
unne and manure,			
sponed straw,			
enluent, collected			
separately on site			
Sludges			
treatment of whe		Anaerobic	
weather of Urban		Digestion	
wastewater Sludges			
Suuges from		Anaerobic	
privsico/cnemical		Digestion	
ucaunent			

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Wastes from	T		
aerobic treatment			Landfill (inert)
of solid wastes			
Wastes from			
aerobic treatment			Landfill (Inert)
of wastes			. ,
Wastes from		Allerthe	
preparation of		Alkaline hydrolysis	
meat, fish and			
other foods or			
animal origin		$\phi = 0$	
(M+BM)		· · ·	
End of like types		Recycle anumb	
011		rubber	
Other wastes ??			
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A.2 Waste Acceptance: Waste Transfer Station STORAGE.

Waste Type	European Waste	DESCRIPTION
	Notel Catalogue	
	(EWC)	
Wasta ail	12 01 00	All waste oils including hydraulia
waste on	13 01 00	oils oil/water mixtures and waste
	13 02 00	fuels
	13 05 00	lucis
	13 07 00	
Oil filters	16 01 07	Oil filters from cars and
		machinery/plant.
Asbestos	17 06 01	Insulation materials and
	17 06 05	construction materials containing
		Asbestos
Oil/sand mixtures or mixtures of	17 05 03	Soil containing fuel oil, diesel and
oil and other material	•	other dangerous substances.
Wood preservation waste	03 02 00	Organic and inorganic wood
		preservative wastes
Wastes from petroleum refining,	05 01 00	Waste from Petroleum refining.
natural gas purification and		
pyrolytic treatment of coal		
Wastes from inorganic chemical	06 01 00	Wastes from MFSU of acids,
processes	06 02 00	bases, salts, metallic oxides
	06 03 00	including spent activated carbon
	06 04 00	313
	06 05 00	
	06 13 00	
Wastes from organic chemical	07 01 00	Wastes from MFSU of organic
processes	07 02 00 101 01	chemicals, plastics, dyes,
	07 03 000	pharmaceuticals, soaps and
	07 04 00	detergents
	07.05.00	
	07 07 00	
Agrochemical wastes	02.01.05	Waste chemicals for the treatment
Algroundinieur musico		of animals. Examples include
C ^o		sheep dip and louse powder.
Infectious Healthcare Waste	18 01 00	Wastes from the treatment.
	18 02 00	diagnosis or prevention of diseases
		in animals or humans.
Photographic processing waste	09 01 99	Solid and liquid waste from the
		photographic industry.
Paint, inks, adhesives and resins	08 01 00	Obsolete paints and inks and paint
	08 03 00	related material.
	08 04 00	
Batteries and accumulators	16 06 01	Lead Batteries.
Florescent tubes and other	20 01 21	Fluorescent tubes and other
mercury containing waste		mercury containing waste.
Wastes from the mining industry	01 01 00	Wastes from mineral excavation
]	01 03 00	and from the physical and
		chemical processing of minerals.
Meat and bone meal	02 02 02	Meat and bone meal/ specified
	1	risk material from the rendering of
	00.01.00	animals.
Other Agricultural and food	02 01 00	Materials unsuitable for
processing wastes	02 02 00	consumption or processing or
	02 03 00	other wastes from the dairy or
1	1 02 04 00	1 1000 processing industries.

Maximum annual quantity to be accepted shall not exceed: 15,000 tonnes.

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CLEAN PRODUCTION and ZERO WASTE

With respect to the real-time generation of toxic waste the current practice of clean production and toxic use reduction strategy programs goes a long way towards reduction and the eventual phase-out of process and product waste.

An example of this is Massachusetts US whereby a participatory program between industry involving some 1,000 firms and community activists to reduce toxic waste, led to the implementation of mandatory pollution prevention legislation called the TURA act (Toxic Use Reduction Act).

This program of 'Clean Production' which started in the early 90's is still on-going with technical assistance and training being provided by the TURI Institute (Toxic Use Reduction Institute) at Lowell University Massachusetts. This initiative is funded by state and industry. The success of this program led to the considerable reduction in process and product waste coupled with financial gain to industry and the overall defeat of three planned incinerators in the state. To date the success of the program has led to a reduction in:

- toxic byproducts by 69%,
- toxic chemical use by 45%,
- quantities of toxics shipped in product by 60%,
- on-site releases of toxics to the environment by 92%, and
- transfers of toxics off-site for further waste management by 58%.

Traditionally, four facets of Clean Production have been recognized:

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• Precaution

Manufacturers carry the burden of showing that their practices are safe for workers, residents or others who might be affected.

• Prevention

There is no need to find a cure for a disease that does not exist. Similarly, if we can avoid the production of hazardous waste materials then we have no need to find ways of destroying or storing such wastes.

• Democracy

True integration of a clean production model is impossible without input from workers, consumers and communities.

0 Holism

The environmental and economic impacts of industry ripple far beyond the communities they reside in. We must be able to consider all of these impacts when we design and implement manufacturing processes.

With respect to the Ringaskiddy proposal the main strategies to implement in reducing toxic/hazardous waste should include a comprehensive study demonstrating best practicable environmental option (BPEO) for toxic/hazardous waste, with the main

criteria being sustainability, economic basis, and legislative initiatives for source reduction. It would entail the implementation of the following:

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Implement Mandatory pollution prevention-start on a county wide basis and work up to a national implementation strategy.

Enforce Clean Production practice where practicable combined with mandatory pollution prevention. Such an initiative must be funded by state and industry. This results in economic gain to participants and a decrease in process and product waste. Example is the Toxic Use Reduction Act in Massachusetts US.

<u>Community right to know</u> - Establish a TRI (Toxic Release Inventory) database to satisfy public access to information. This can be modeled on the OECD initiative on Pollutant Release and Transfer Registers (PRTR).

<u>Product and Process re-design</u>-Some examples in the Pharmachem industry would be change-over to solvent less extraction systems, replacement of organic solvents for aqueous systems, use of single cleaning solvents as opposed to multi-solvent systems and segregation of halogenated and non-halogenated solvents.

To assist in the above, increased legislative regulatory encouragement and/or incentive combined with a programme of technical assistance needs to be enforced. (More funding for and more Clean Technology Centers required to provide technical training to implement Clean Production particularly for SME(s)

<u>Centralized remediation facility</u>. For fractions which exist after source reduction and clean production has being implemented the examination of proprietary non-burn technologies (preferably) as a final disposal option for segregated toxic waste streams. This depends on critical mass of the respective waste. Separation into aqueous wastes, organic solvents, filter cakes, spent catalysts, sludges etc is essential.

This could comprise a national hazardous multi-technological treatment facility conducting some or all of the following deconstruction and reconstruction processes;

Chemical and/or electrolytic oxidation processes Catalytic decomposition Dehalogenation Water removal –membranes, ion exchange, extraction, distillation Biological treatment Wet air oxidation/hydrolysis- a good pre-treatment for biological degradation Carbon regeneration

An integrated, sustainable approach with strict adherence to the EU's waste hierarchy is vital in adopting the Country's Waste Management Plan. The principle of Zero Waste best integrates this philosophy as practiced in many countries.

'Zero Waste': the 5 basic Principies

Product, packaging and process re-design. Clean production and toxic use 1. reduction.

Designing products for the environment and not for the dump or the incinerator eg Rank Xerox saved 76 mill dollars by reducing their waste through product redesign. This constitutes more efficient use of energy and materials.

2. Extended Producer responsibility EPR.

Holding manufacturers responsible for waste generation and environmental impacts. Polluter pays principle nor comsumer pays.

3. Investing in infrastructure

A call for investment in community projects i.e. Centralized Anaerobic Digestion to take place of landfill or incinerators

Ending subsidies for wasteful and polluting industries 4.

Pollution, energy consumption and environmental destruction all start with virgin resource extraction, mining etc. For example the extraction of aluminium from Bauxite is a far more energy intensive practice than the recycling of aluminium cans to original material by 80% example. Recycling industry should be tax subsidized as opposed to the ther us manufacturers industry.

5. Creating jobs and new businesses of the analysis of the second report "wasting and recycling in the US" on a per ton basis sorting and processing recyclables alone sustains 10 times more jobs than landfilling . The report also shows that recycling based paper-mills and the recycling plastic industry employs 60 times more workers on a per ton basis than landfill or incineration dicor

In Conclusion

CASE calls for a

- Immediate Moratorium on Incineration as a form of waste management,
- Proper evaluation of waste categories, classification and volumes, ٩

Consent

- Mandatory pollution prevention programs with technical assistance and adequate funding for its implementation,
- Legislative initiatives to implement eco-friendly alternatives treatments to 0 incineration.

We must move away from the old concept of burning and advance towards the practice of re-use and recycling which makes more efficient use of resources and energy.

We hold that the EPA is in blatent breach of its mandate in issuing this draft licence, object to this, and ask for a recommendation that it be revoked.

	00.05.00	
	02 05 00	
	02 06 00	
	02 07 00	
Waster from the leather for and	04 01 00	
tentile in destaise	04 02 00	
textile industries	04 02 00	
Inorganic wastes from thermal	10 01 00	Wastes from power stations and
processes	10 04	other combustion plants.
	01 10	-
	11.00	
	11 22	
Inorganic metal containing wastes	11 01 00	wastes from the surface treatment
from metal treatment and the	11 03 00	and coating of materials and waste
coating of metals and non ferrous	11 05 00	sludges.
hydrometalluray		8
Nydromotandrgy	12.01.00	N
wastes from snaping and surface	12 01 00	wacming ons, studges and
treatment of metals and plastics		emulsions.
Wastes from organic substances	14 06 00	Solvents and mixtures containing
used as solvents (other than 07		halogenated and non-halogenated
and (18)		solvents and CECs
		sorvents and CrCs.
Wastes packaging; absorbent,	15 01 00	Hazardous packaging, filters,
wiping cloths, filter materials and	15 02 00	absorbents and protective clothing.
protective clothing not otherwise		
specified		
specificu		
Wastes not otherwise specified	16 02 00	Electrical equipment containing
	10 03 00	CFCs, televisions, off
	16 05 00	specification batches, laboratory
	16 06 00	shomicale oridising substances
		chemicals oxidising substances,
	160700	car batteries and waste linings and
	16 08 00	refractories.
	16 09 00	2
	16 11 00 001	ar
Wastes from treatment facilities,	19 19 08	Boiler ash, fly ash, waste from
off-site waste water treatment	19 19 09 JULY JULY	water treatment plants and wastes
plants and the water industry	all' test	from the preparation of water.
P-mark mark and a second and and any		
Municipal wastes and similar	20 01 002 8	Solvents acids alkalines
Municipal wastes and similar	20 01 000 300	Solvents, acids, alkalines,
Municipal wastes and similar commercial, industrial and	20 01 00 Contraction	Solvents, acids, alkalines, pesticides, paints, inks adhesives,
Municipal wastes and similar commercial, industrial and institutional wastes including	20 01 00 Contraction	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 ont	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 ont	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 with	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and waste electrical and electronic
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 to institution to copring to an	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and waste electrical and electronic
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 just	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and waste electrical and electronic equipment.
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 totified to with totified to with 20 01 01	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and waste electrical and electronic equipment. Waste newspapers, magazines,
Municipal wastes and similar commercial, industrial and institutional wastes including separately collected fractions.	20 01 00 toinsettown toinsettown 20 01 01	Solvents, acids, alkalines, pesticides, paints, inks adhesives, resins, detergents containing dangerous substances, cytotoxic and cytostatic medicines and waste electrical and electronic equipment. Waste newspapers, magazines, cardboard and other paper
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REFRENCES.

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