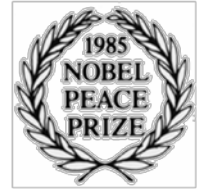




Physicians for
Social Responsibility



United States Affiliate of International Physicians for the Prevention of Nuclear War

November 24, 2009

Douglas Knipple, PhD
President, Finger Lakes Zero Waste Coalition
P.O. Box 865
Geneva, New York 14456

Dear Dr. Knipple,

Physicians for Social Responsibility is pleased to support the Finger Lakes Zero Waste Coalition in opposing the gasification incinerator proposed for Ontario County, NY. We have taken this position because of health, economic and environmental concerns associated with gasification incineration.

Gasification incineration is an unproven technology for the commercial processing of municipal solid waste. Several sources of data suggest that gasification incineration results in emissions of dioxin, the most toxic known man-made substance.¹ Data from the US Environmental Protection Agency (EPA) has shown that gasification units emit more dioxins than older style incinerators.² Emissions data gathered from the Plasco gasification incinerator in Ottawa, Canada shows emissions of dioxin;³ although that data has not been independently verified, it raises serious concerns. In addition, the European Commission's *Integrated Pollution Prevention and Control Reference Document on the Best Available Technologies for Waste* found that "emission levels to air from the combustion stage of such [gasification and pyrolysis] installations are the same as those established for [other] incineration installations."⁴

These findings are cause for alarm because there is no safe level of exposure to dioxin.⁵ Known health impacts of dioxin include cancer, IQ deficits, disrupted sexual development, birth defects, immune system damage, behavioral disorders, diabetes and altered sex ratios.⁶ Studies show higher levels of cancer⁷ and elevated levels of dioxin in the blood of people living near municipal solid waste incinerators when compared to the general population.⁸

Furans, mercury and other harmful emissions are also of grave concern.

¹ "Paternal Concentrations of Dioxin and Sex Ratio of Offspring" in the *Lancet* 2000; 355: 1858-63, 27 May 2000.

² US Environmental Protection Agency, *Compilation of Air Pollution Emission Factors*, Volume I, Fifth Edition, AP-42.

³ Plasco Energy Group. (August 5, 2008) slide presentation to Port Moody, B.C. Environmental Protection Committee Task Force (EPC-TF).

⁴ European Commission (2005). *Integrated Pollution Prevention and Control Reference Document on the Best Available Techniques for Waste Incineration*, p. IV.

⁵ "No Evidence of Dioxin Cancer Threshold," David Mackie, Junfeng Liu, Yeong-Shang Loh, and Valerie Thomas, Abstract available online at: <http://www.ehponline.org/docs/2003/5730/abstract.html>.

⁶ Lester, Stephen, "The American People's Dioxin Report," Center for Health and Environmental Justice, 1999. Available online at <http://www.besafenet.com/report.html#Executive%20Summary>.

⁷ P. Elliott and others, "Cancer Incidence near Municipal Solid Waste Incinerators in Great Britain," *British Journal of Cancer*. Vol. 73 (1996), pgs. 702-710.

⁸ Leem, et al., 2006. "Risk Factors Affecting Blood PCDDs and PCDFs in Residents Living near an Industrial Incinerator in Korea." *Arch. Environ. Contam. Toxicol.* 51:478-484.

We also have serious concerns about the gasification incinerator being sited near expanses of open farmland. Studies show that high levels of dioxins have been found in food and dairy products produced near incinerators.⁹ The toxic impacts of incineration may, in other words, spread beyond the local area as food products are shipped to other communities.

Physicians for Social Responsibility has joined with more than 130 organizations—including the Natural Resources Defense Council, Sierra Club, and Health Care Without Harm—in signing the *No Incentives for Incinerators* statement to express our concern that incinerators of all types—including plasma, pyrolysis and gasification—are a detriment to the climate, the economy, and the health of U.S. communities.¹⁰ We reiterate that position today.

To protect health in Ontario County, we call for an end to the harmful practice of incineration and the strengthening of programs for waste prevention, recycling and composting. At a minimum, Ontario County should not approve any proposal for incineration until independently verified data has been provided to the public on the gaseous, solid and liquid emissions from an operational commercial gasification facility of a comparable size and waste stream.

Sincerely,



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⁹ Ellen and Dr. Paul Connett, *France: Dioxin Contamination from Trash Incinerators*, WASTE NOT #423 (March 1998).

¹⁰ No Incentives for Incinerators Sign-on Statement, 2007, available online at:
<http://noburn.live.radicaldesigns.org/article.php?id=247>