



YOUR COMMENTS COUNT!

The Blue Ridge Environmental Defense League and the Haw River Assembly support the following:

- **Incineration is an OLD TECHNOLOGY.** Incineration of medical waste results in toxic air emissions, and poses a risk to public health. Medical waste incinerators may have pollution control equipment, but toxic emissions still occur. It's a lot like a cigarette with a filter! Medical waste incinerators using pollution control equipment release tens of thousands of pounds of toxic air pollutants into the air annually that include mercury, dioxins, furans, particulates (soot), lead, sulfur dioxide, nitrogen oxides (ozone), hydrogen chloride, chlorine, hydrofluoric acid, cadmium, and many other toxic by-products. Air pollution control equipment does not remove all these pollutants, and can fail, releasing raw, toxic air pollutants directly into the air, called "by-pass events." What can we do to protect our health from the dangers of incineration?
- **Incineration can be replaced with autoclaving and/or other technologies.** Stericycle burned 26.3 million pounds of waste last year at its Haw River facility. Much of this waste could have been sent to their company-owned autoclave in Concord, NC. Autoclaving is a state-approved process by which medical waste is sterilized, shredded, and landfilled. Waste is not incinerated, and our air would be much cleaner. We recommend that Stericycle commit to switch to a cleaner, safer and more-environmentally-friendly method of waste disposal – such as autoclaving! Additionally, Stericycle could install other non-burning alternative technologies on site at Haw River. As a multi-billion dollar industry, with revenues topping over \$1.1 billion dollars and operating profits exceeding \$300 million in 2009, Stericycle produces 10 year annualized returns of 28% and earnings/share compounded at 32% annually.
- **By pass events should no longer be exempt from the regulations and the public has a right to know they have been exposed.** By-pass events (also known as "start-up, shut-down malfunctions") occur when the air pollution control equipment on the incinerator fails, releasing an unknown amount of concentrated, and uncontrolled air pollutants into the air. Under the old EPA rules these "by-pass events" were deemed exempt. Under the new EPA rules, by-pass events will be counted as violations with penalties issued. Stericycle has had many by-pass events in the past. The public has a right-to-know what they have been exposed to and for how long. We recommend the state take action immediately to require that all by-pass events are no longer exempt, and will be considered a violation under the new permit.
- **Combinations of air pollutants are harmful to public health and the environment.** The President's Cancer Panel recently issued a new report on the dangers of chemicals in our environment. The report concluded that tens of thousands of chemicals and other substances currently in use have never have been evaluated, and it is not known how many cause cancer. Only a handful of chemical mixtures have been assessed, and virtually nothing is known about the toxicity of the combinations of various chemicals under various situations. New chemicals are created from the incineration process, and these are not tested or regulated. We do know that many of the air pollutants now being released from Stericycle cause cancer, brain damage, birth defects, learning disabilities in children, asthma, liver and kidney damage, heart problems and many other illnesses, and children and pregnant women are at special risk for cancer, as are families that live near the incinerator. In addition to polluting our air, these toxic emissions pollute our gardens and farmlands, and our rivers, lakes and streams posing a threat to wildlife. For all these reasons, we recommend that the state consider new thinking about the impacts of

each of these chemicals released from Stericycle, and the effects of combinations of these chemicals on our health and environment.

- **Ban the burning of plastics.** Dioxin is one of the most toxic chemicals known to science. Dioxins and furans accumulate in the food chain. The developing fetus is most susceptible to dioxin exposure, and dioxin is passed to babies through the mother's breast milk. Dioxins cause cancer, suppress the immune system, disrupt the hormonal system, and impair neurological development. Dioxin production is of great concern for its toxicity, and because it is created in medical waste incinerators from the combination of combustion and chlorine. Burning PVC plastics heavily contributes to the chlorine. Stericycle can require its customers to segregate plastics in its contracts with them. The state can require this in their permit renewal. Plastics should - and can - be segregated, and sent to a non-burning disposal alternative.
- **No paper burning with medical waste.** Incinerator facilities prefer to burn paper as an additional fuel. Paper as fuel is a win-win situation for Stericycle since it generates revenue as well as savings from the fuel it replaces. The burning of paper wastes a natural resource that could be reused. Shredding and recycling should trump burning. Burning paper has no place in a medical waste incinerator!
- **Stop the burning of international garbage.** International waste contains a great deal of plastics in the wrappers and containers. Stericycle has permission to treat its garbage in its Concord, NC, autoclave. However, this waste is still being burned at its Haw River incinerator. We recommend that all burning of international garbage at Stericycle's incinerator be removed from Stericycle's permit renewal.
- **Demonstrate that the burning of pharmaceuticals is safe.** Industry and the state should prove to the public that burning pharmaceuticals is safe, and does not pose a risk to public health or the environment. Since it is a violation to burn hazardous waste in NC, we are requesting that Stericycle and the state provide information and demonstrate to the public how hazardous pharmaceuticals are segregated from non-hazardous pharmaceuticals, and inspect for compliance.
- **Demonstrate that incineration of non-hazardous trace chemotherapeutic waste is safe.** Industry and the state should prove to the public that burning trace chemo waste from the entire east coast in the amounts of 4-5.3 million pounds a year is safe and won't impair the public's health or the environment (last year's figures). What about all the plastic tubing and IV bags that are burned? Where are the studies on health effects from emissions? Clarify the rules for treatment of hazardous vs. non-hazardous trace chemo waste, and inspect for compliance.
- **Unannounced inspections.** Currently the state conducts inspections at Stericycle, but inspections are scheduled with the permittee giving the permittee adequate time to prepare. We recommend the state conduct unannounced inspections which would replicate normal operating conditions.
- **2 years for safer, cleaner, air – not 4!** The Environmental Protection Agency (EPA) recently issued new rules that require all medical waste incinerators to come into compliance with more protective standards for air pollutants by 2014. The Mecklenburg County Board of Commissioners voted unanimously to require that ALL medical waste incinerators in NC come into compliance by 2012 instead of 2014. We recommend that the state adopt the same requirement which result in the public not having to breathe an additional two-years of toxic air pollutants, and two-years of additional protection to the environment.

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE