



the campaign for
environmentally responsible
health care

Without Harm

THE ENVIRONMENTAL HEALTH FUND

May 24, 2010

Donald van der Vaart,
DAQ Permits Section,
Re: Stericycle Permit,
NC Division of Air Quality,
1641 Mail Service Center, Raleigh, NC, 27699-1641

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Dear Mr. van der Vaart,

I am writing to provide input regarding the proposed permit renewal for the Stericycle medical waste incinerator in Haw River, North Carolina.

Health Care Without Harm is an international non-profit organization working to transform the environmental practices of the healthcare sector. We have been working for fifteen years to reduce the environmental and public health impacts of the sector and assist hospitals in efforts to replace polluting practices and technologies with safer alternatives.

When we launched HCWH in 1996, the Environmental Protection Agency reported that medical waste incinerators were the largest source of dioxin air emissions in the nation and also responsible for 10% of all mercury air emissions. At that time, there were approximately 4,500 medical waste incinerators operating in the country. Today there are less than 60 incinerators left, in large part due to the fact that hospitals have learned that reducing medical waste generation through upstream reuse and recycling methods, as well as switching to safer treatment technologies, both save money and protect the environment. This is not a situation where we need to weigh environmental and public health goals against economic goals. If it were, there would not have been such a dramatic rejection of incineration in favor of a suite of other alternatives. In the case of medical waste management, incineration is by far the most expensive option for the hospital sector and also the most polluting. By continuing to provide permit to the Stericycle incinerator, the State is enabling the continuation of an outdated technology that only economically benefits this one company and disadvantages both the general public's health, local property values and the more efficient management of medical waste by the sector.

In light of these considerations, we recommend the following provisions be included in the permit renewal for Stericycle:

1. the State should set a timetable of two years to require Stericycle to replace its current incinerator capacity with autoclave technology, which is a proven technology and widely used around the country, both on-site in hospitals and through large scale commercial facilities. The company already operates commercial autoclaves in both North Carolina and other states and has both the expertise and financial incentive to do so.
2. the State should prohibit the burning of plastics in the medical waste incinerator. The reason that the EPA identified medical waste incinerators (and garbage incinerators after them) as the largest sources of dioxin emissions in the U.S. was because of the volume of chlorinated plastics, most notably PVC plastics, in the waste stream. PVC is the principal chlorine "donor" for the production of dioxin in the incineration process. This is as true today as it was in 1996. By

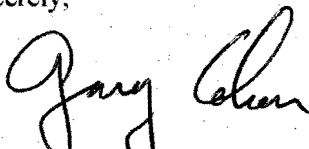


- production of dioxin in the incineration process. This is as true today as it was in 1996. By permitting the indiscriminate burning of plastic waste in the Stericycle incinerator, the State is essentially permitting the release of cancer causing chemicals to be dumped on North Carolina farmland and taken up in the food chain. Dioxin is especially lipophilic, which means it is stored in the fat tissue of animals and humans and passed down to offspring through breastfeeding.
3. the State should prohibit the combustion of paper in the Stericycle incinerator. Hundreds of hospitals nationwide are recycling paper waste and saving money in the process. Rather than permit the continued thermal destruction of valuable resources, the State could send a strong signal to the upstream hospital sector that they should be recycling paper waste, rather than sending it to the Stericycle incinerator to be burned.
 4. the State should restrict the permit for international garbage. We see little value to allowing Stericycle to accept garbage from other countries. This does nothing more than turn the host community into the toxic sacrifice zone which only benefits the company and no one else, while depressing property values and damaging the image of the community and its civic vitality. Just last week the New York Times reported that the Harrisburg, Pennsylvania incinerator had badly damaged the city's credit rating and contributed to the town's overall decline. There is no value in attracting international garbage to Alamance County.
 5. the State should restrict the burning of non-hazardous pharmaceutical waste in the Stericycle incinerator. There is broad agreement in the nation that dumping pharmaceuticals into the environment is damaging to aquatic life and to other species, yet the indiscriminate burning of all pharmaceuticals is not a panacea either. We encourage the State to require Stericycle to develop a process with stakeholders and technical experts to explore alternative treatment strategies for pharmaceutical waste over the next two years and report back to the State on its findings before any new permit is issued to the company beyond the two year period.
 6. the Stericycle incinerator also burns a considerable amount of chemotherapy waste in its facility. There is a void of knowledge regarding the long term public health and environmental impacts of this practice. For similar reasons as above, we recommend that the State require Stericycle to develop alternatives to this practice and report back to the State after two years before any new permits can be issued.
 7. the State should support the public's Right to Know about by-pass events at the Stericycle incinerator and impose fines on the company for every by-pass event. These events are essentially episodes where air emissions by-pass pollution control equipment and dump poisonous chemicals into the surrounding community. The public has a right to know that they are being exposed to toxic chemicals while the State has an obligation to penalize the company for lack of responsible management. In addition to this general rule, Stericycle has a record of having by-pass events every year. Why should the public pay for these episodes and not the company?

I am grateful to be able to provide comments to the State regarding this permit application. We would be willing to have follow up conversations with all involved if that would assist the State's decision making in any way. Please feel free to contact my office at 617-524-6018.

Thank you.

Sincerely,



Mr. Gary H. Cohen
President and Founder
Health Care Without Harm