

Good Afternoon,

My name is Nancy Caldwell. I was born and raised in RI and have been a resident of East Greenwich for over 35 years. I have lived in the same house, raised my family here and am deeply vested in the future of our state. I strongly support and urge the passage of H5923, to ban all new high-heat waste processing facilities.

Despite living nearby I was completely unaware of the MedRecycler proposal to process regulated medical waste using high-heat pyrolysis at 1600 Division Road in West Warwick until January 2021. There had been little publicity or news coverage regarding the company or intended activity. When I passed by the MedRecycler sign traveling along Division Road, I never imagined it referred to processing regulated medical waste on site, smack in the middle of a community, inside an existing building filled with other businesses. I began to educate myself on the proposal, the company, and the process and history of pyrolysis for treating waste. The more I learned, the more concerned, dumfounded, and horrified I have become.

I have studied the materials provided to the Town of West Warwick and RIDEM and am deeply worried by the inconsistencies, omissions, lack of oversight, and the conflicting and misleading information disseminated by the company verbally and through social media. The focus is always on the safe “closed loop” nature of pyrolysis, ignoring the danger of the facility and its operation.

The process will rely on truckloads of medical waste from the entire New England region and as far away as New York for feedstock. How is trucking in waste for processing here safe or of benefit to our community, for Rhode Island? The idea of trucks filled with regulated medical waste traveling down our highways and roads and arriving at 1600 Division Road is truly chilling. There is the potential for accidents, tip overs, spills.... These trucks are not airtight, the cardboard boxes and containers inside are not airtight, and the “monitoring” of such truckloads consists only of a “walkaround.” What airborne pathogens are potentially released before these containers ever get to the closed pyrolysis chamber? The proposed facility will not accept radioactive waste, yet the 7/28/20, Revision 9 Section 5 (pg 49) of the Application to DEM has a procedure “should radioactive material be detected the container is labeled as radioactive and temporarily placed in a controlled area away from the employees. In most cases, the material will decay to an acceptable background limit and may be processed as regulated medical waste.” What is the “allotted time frame” for radioactive waste to decay at 1600 Division Road before processing or being sent back down our roadways to the generator?

My husband, Peter Kingman, as a mechanical and structural engineer expressed reservations from a different perspective: we discussed the intense heat and corrosive materials that will be produced and how these could affect the integrity of the building, and its life span. It is believed that such corrosion was the cause of a plant stack collapse in a pyrolysis plant in Germany. Other pyrolysis facilities have experienced similar failures and even explosions. While this is unlikely, it has happened and *is* possible.

While the emphasis is on high heat *pyrolysis* and how it differs from incineration, pyrolysis is actually a 2-part process often called “staged incineration.” That is why the gasses produced must be scrubbed and put through a thermo oxidizer before being released into the air we breathe. These are not 100% effective. As such, greenhouse gasses (20,000 – up to 25,000 tons/year of just CO2!), known potentially dangerous emissions and toxic residue will be generated. And of great concern are also the unknowns: During the DEM public comments zoom meeting Mr. Jim Mullowney expertly detailed the chemicals

that would be airborne as this regulated medical waste is processed and the gasses released as, "These are not destroyed or broken down by pyrolysis. In his OpEd piece in UpRiseRI on March 27, 2021, he warns "These chemicals are drugs. The MedRecycler system does not eliminate or destroy them." Mr. Mullowney's statements resonated with me, having endured chemotherapy with one of the alkylating agents he references. I know how debilitating the effects can be. The idea that neighbors and family will potentially be breathing in these derivatives of deadly mustard gas in any amount is truly disturbing. The lasting impact on health could be devastating as these chemicals are "mutagenic (cause birth defects), teratogenic (skips a generation before causing a birth defect) and carcinogenic (cause cancer)." RI DEM has acknowledged that they are unfamiliar and unable to oversee these types of facilities, putting us all at risk.

There are also serious concerns regarding the financial solvency of this particular company and of pyrolysis as being financially viable. Pyrolysis plants elsewhere have failed many times. Using pyrolysis to process heterogeneous medical waste as exclusive feedstock is untested and unproven. West Warwick has entered into a Faustian Bargain with an out of state developer with NO Waste facility experience and Thermotech, a South African company with only 3 other pyrolysis plants in operation: 2 in South Africa, 1 in the UK. None of these processes medical waste. Seduced by the promises of jobs, tax revenue, green, renewable energy, West Warwick has set a precedent for this kind of intrusion by companies seeking to cash in on "green" initiatives. It is imperative to implement a ban on these high heat facilities at the State level by passing H5923 to avoid a whack-a-mole scenario as other developers try to do the same in other communities. It will alleviate any other community from experiencing the frustration, heartache, anxiety and fear that the citizens of Kent County currently suffer.

Bill H5923 is particularly significant at this moment as claims are made that these high heat methods are safe, green and renewable when they are none of those. It is simply the same detrimental activity - incineration- by another name, by another (not very different) means. Such proposals resurrect this dangerous and outdated practice through supposedly "new" technologies like pyrolysis, but in reality, the same ash, char, toxic heavy metals, and harmful, carcinogenic and dangerous emissions are produced and released. They do not "disappear" as has been promulgated. These facilities are unsafe, expensive and rarely live up to their energy or revenue producing promises. High heat waste processing facilities merely perpetuate waste-to-burn inefficiencies and harmful impacts. It is incineration greenwashed with a new name and promises of safe, state-of-the-art new technology to divert attention and dollars from the real green initiatives that will create meaningful jobs for Rhode Islanders and protect our health, safety and environment.

Whether it's called gasification or pyrolysis continued waste incineration, which is what high heat waste processing facilities do in a waste-to-burn cycle, cannot be equated with solar, wind, or other green renewable energy or conservation projects. Allowing these types of high heat waste processing facilities to creep into our communities, our state, under the guise of "greenness" in schemes to capture green energy dollars incentivizing and subsidizing the burning of waste just perpetuates waste and pollution and harmfully impacts our environment. Bill H5923 would put a stop to this across our state.

In keeping with the national initiative toward zero-carbon sources like wind and solar power and away from fossil fuel processes like gasification and pyrolysis, RI has made a wise choice to move toward a cleaner, greener future with thoughtful consideration of the Act on Climate and Green New Deal. Passage of this current bill (H5923) would strengthen and safeguard that movement by prohibiting the

continued “burning” of waste, specifically by high heat processes. I strongly support the passage of this bill to protect our citizens and our beautiful Ocean State. Thank you for your consideration,

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