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**CITIZENS ENVIRONMENT ALLIANCE**  
of southwestern Ontario

May 11, 2010

Mr. Remilando Pinga  
DNRE, AQD Detroit Field Office  
3058 West Grand Boulevard Suite 2-300  
Detroit, MI 48202  
Via Fax: 313-456-4692

Re: Renewable Operating Permit for the Greater Detroit Resource Recovery Facility,  
SRN M4148, Wayne County

The Citizens Environment Alliance of southwestern Ontario urges the Michigan Department of Natural Resources and Environment (MDNRE) to deny the proposed renewable operating permit (ROP) for the Greater Detroit Resource Recovery Facility based upon the significant adverse impacts on the surrounding and downwind communities.

The Greater Detroit Resource Recovery Facility, also known as the Detroit Municipal Waste Incinerator ("the Municipal Incinerator"), began operating in 1991. By most accounts, it is the largest waste-to-energy incinerator in the United States.

The MDNRE estimates that the Municipal Incinerator annually emits 263.52 tons of carbon monoxide, 1,729.89 tons of nitrogen oxides, 199.74 tons of sulfur dioxide, 12.14 tons of particulate matter, 3.62 tons of volatile organic compounds, 0.03 tons of lead, and more than 41 tons of other hazardous air pollutants. A study by the Detroit Free Press noted that the Municipal Incinerator released 396 pounds of lead into the air between 1998 and 2001, and soil tests in the neighborhood to the east of the Incinerator showed high lead levels along three streets, of between 532 and 604 ppm. In addition, EPA estimated that in 1999 the Municipal Incinerator released approximately 320 pounds of mercury, making it the third largest source of mercury emissions in the state. The facility has a long history of substantial air emissions.

Windsor and Essex County, Ontario are downwind of the Municipal Incinerator. Each year in Ontario, transboundary air pollution causes 2,700 premature deaths, puts almost 12,000 people into hospital and causes minor illness symptoms in about 2.7 million others. (Ministry of the Environment (MOE): *Transboundary Air Pollution in Ontario*, June 2005).

It is responsible for an estimated \$5.2 billion in damage to Ontario's population, economy and environment. (MOE website:  
<http://www.ene.gov.on.ca/en/air/tap/index.php#info>)

The pollutants emitted by the Municipal Incinerator can have significant health impacts. Lead poisoning among Detroit's children is a serious public health crisis, and the ZIP code surrounding the Incinerator had the highest percentage of Detroit children who were tested and diagnosed with elevated blood lead levels. (Detroit Free Press, January 21-26, 2003 special report, [www.freep.com/lead](http://www.freep.com/lead)). Exposure to particulate matter can trigger asthma attacks and aggravate other lower respiratory diseases, and is related to increased rates of lower respiratory and heart disease and to higher mortality from these illnesses. (EPA website: [www.epa.gov/oar/aqtrnd97/brochure/pm10.html](http://www.epa.gov/oar/aqtrnd97/brochure/pm10.html)). Exposure to high levels of nitrogen dioxide (NO<sub>2</sub>) can irritate the lungs and may contribute to acute respiratory illnesses. (EPA website: [www.epa.gov/oar/aqtrnd95/no2.html](http://www.epa.gov/oar/aqtrnd95/no2.html)). Sulfur dioxide (SO<sub>2</sub>) can make breathing difficult and exacerbate respiratory illness and existing cardiovascular disease. (EPA website: [www.epa.gov/oar/aqtrnd95/so2.html](http://www.epa.gov/oar/aqtrnd95/so2.html)). Exposure to ground level ozone, which is caused when volatile organic compounds (VOCs) react with nitrogen oxides, significantly reduces lung function and causes respiratory inflammation, even in healthy individuals. Long term exposure can cause permanent lung damage. Mercury exposure can damage brain functioning and can also cause damage to the kidneys. (ATSDR website: [www.atsdr.cdc.gov/tfacts46.html](http://www.atsdr.cdc.gov/tfacts46.html)).

Many of these pollutants are particularly harmful to vulnerable populations, such as children, the elderly and those who are already suffering from respiratory or heart diseases. This last fact makes these emissions even more significant, because Detroit residents and the community directly surrounding the facility have significantly poorer general public health than surrounding communities.

The ROP should consider the cumulative effects of all the pollution sources affecting the residents of this community and those downwind of the facility. The Municipal Incinerator is far from the only pollution source in this community. Its emissions must be considered in conjunction with the pollution created by other sources. Because of the significant number of pollution sources in the community and the poor public health already existing in the community, the emissions from the Municipal Incinerator, which is one of the largest pollution sources in the area, must be considered adverse.

Sincerely,

Derek Coronado  
Coordinator, Citizens Environment Alliance of southwestern Ontario