

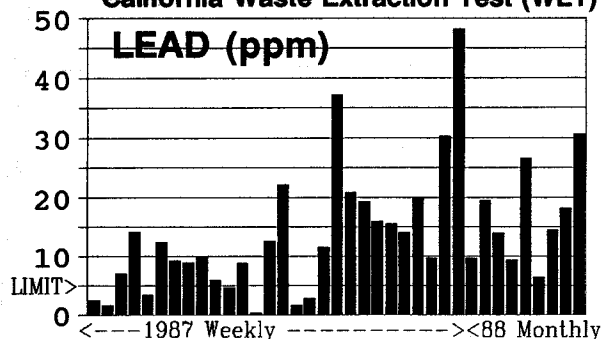
CALIFORNIA: FOSTER WHEELER'S 'MODEL' INCINERATOR IN COMMERCE DENIED 'PERMIT TO OPERATE' PART 2

BAGHOUSE FAILURES. Even though the baghouse was failing in October and November, 1987, **CREA** (Commerce-to-Energy Authority) didn't know of the failure until smoke was visible in February 1988. From February 13 to April 18, 1988, 21 bags failed according to **CREA**. **CREA** said the fabric filters had been in operation for 7,000 hours of service when they decided to replace all 1,100 bags in the pollution control system. According to Will Baca, "The amount of metals such as mercury released in the air increases by 50 times" during baghouse failures. Baca says there is a "significant increase of metals to the air when even one baghouse fails." During tests for metals emissions performed in the summer of 1988, tests revealed a 100 fold increase for lead. During this testing one baghouse failed, and it was only discovered when the monitoring instruments were removed and found stained from the baghouse failure. (Note: all new bags were installed in May 1988). **American Air Filter**, supplier of the baghouse system to **CREA**, placed a 2-year warrantee on the baghouses. When **CREA** went to **American Air Filter** to take advantage of the warrantee **American Air Filter** told **CREA** they had abused the bags. Too much "moisture carryover" from the spray dryer had caused the bags to cake-up and break. The warrantee was voided, according to Baca.

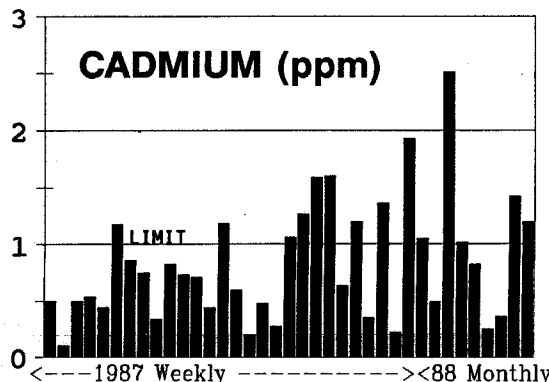
STEAM TUBE FAILURES. The incinerator has experienced numerous shutdowns due to mechanical failures during its almost two years of operation. The incinerator was down in 1987 for 2 weeks in Sept, 2 1/2 weeks in Nov, and 3 weeks in Dec, and in 1988 was down for 25 days in October, for steam tube failures due to higher temperatures and acid corrosion of the tubes.

ASH FAILURES. The following charts detail the cadmium and lead content of the Commerce incinerator ash, which under California toxic standards, failed for lead 81% of the time and failed for cadmium 38% of the time.

California Waste Extraction Test (WET)



CADMIUM (ppm)



Ash Test Data

	LEAD	CADMIUM
3/20	2.4	.5
3/27	1.5	.1
4/17 a	7.07	.5
4/17 b	14.14	.54
4/17 c	3.39	.44
4/23 a	12.31	1.17
4/23 b	9.25	.86
4/23 c	8.94	.75
5/1	9.87	.34
5/28	5.79	.83
6/4	4.64	.71
6/12	8.78	.73
6/23	.29	.44
7/10	12.59	1.18
7/23	22.1	.6
7/30	1.54	.2
8/7	2.75	.28
8/14	11.47	.28
8/21	37.18	1.06
8/27	20.9	1.26
9/a	19.29	1.59
9/b	15.94	1.6
9/c	15.52	.64
10/a	14.03	1.19
10/b	19.89	.36
10/c	9.65	1.36
10/d	30.30	.23
11	48.3	1.93
1/--88	9.7	1.05
2/	19.48	.5
3/	14.	2.51
4/	9.41	1.01
5/	26.6	.83
6/	6.3	.26
7/	14.5	.37
8/	18.27	1.42
9/	30.67	1.19

The California toxicity test differs from the EP Tox test in that it uses citric acid, instead of acetic acid, as the leaching medium to simulate the leachate from a trash landfill.

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THE TALE OF TWO LANDFILLS. Commerce incinerator ash goes to the unlined landfill in Hacienda Heights, which has operated since 1957. This landfill receives approx. 12,000 tons of waste a day, and the ash is co-mingled with the other waste. It is a Class 2 landfill, which means it is not permitted to accept hazardous waste. "State health department officials have allowed the ash to be deposited at the Hacienda Heights landfill and have called it only 'marginally hazardous,'" (San Gabriel Valley Tribune, 1-27-89). Three miles away from this landfill is the **B.K.K. Landfill** in West Covina (referred to by some as 'Waste Covina'). **B.K.K. Landfill** was licensed as a toxic waste landfill until it was prohibited by the state from accepting toxic waste because of the serious leachate problems and toxic gas escapes that penetrated into the community. (200 homeowners sued and won a \$20 million settlement because of the migrating gases.) **B.K.K. Landfill** is scheduled to close in about 3-4 years because of homeowner pressure. In the interim **B.K.K. Landfill** has applied to the State Water Quality Board to accept the Long Beach incinerator ash. The Water Quality Board replied that the Commerce ash results indicated the ash is hazardous and incinerator ash would not be acceptable at the **B.K.K. Landfill**. Why then is the ash acceptable at Hacienda Heights, a landfill also not permitted to accept hazardous wastes?

According to a report in the San Gabriel Valley Tribune, 1-27-89:

- ** "Air currents carry pollutants from Commerce and southeast Los Angeles County into the San Gabriel Valley, where smog becomes trapped against the foothills."
- ** "Data obtained from the AQMD shows that the plant has consistently violated emission limits contained in the plant's preliminary permit since March 1987, often more than 15 days in a given month."
- ** "Many San Gabriel Valley elected officials grappling with the trash burner issue had hoped the Commerce facility would be a real-life laboratory that would distinguish between theoretical and actual pollution figures. However, these figures have not been publicized by either public agency..."
- ** "The plant's designers (**Foster Wheeler**) have touted the project in New York and Texas where others like it are proposed, saying it is operating successfully even under California's strict pollution standards..."

CREA has asked the State Water Quality Board for a modification to their permit to burn 500 tpd of solid waste. **CREA's** current permit is to burn 95% of commercial waste and 5% of residential waste. It is becoming apparent the commercial waste can be recycled and **CREA** is seriously considering burning more tpd and re-vamping its permit from commercial waste to household solid waste.

CREA's tip fee is \$20 per ton. The tip fee at Hacienda Heights landfill is \$12.50. Many haulers prefer going to the landfill. The cost of the Commerce incinerator was \$50 million. The bonds for the Commerce incinerator are held by the **Franklin Group**, a tax-free municipal investment fund. The bonds received a **Standard & Poor's** rating of triple B, a very poor rating according to Will Baca, and a coupon interest rate of 11 1/2%.

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