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United States Virgin Islands Public Services Commission
1003 Estate Ross Ste 4
St. Thomas, USVI 00802
[Via Email: psc.info@psc.vi.gov]

Dear Members of the United States Virgin Islands Public Services Commission:

I am writing to express my concerns regarding the proposed project to convert all the garbage on St. John into fuel for a power plant. While the concept of waste-to-energy (WtE) may initially appear to offer a solution to waste management and energy production challenges, the reality is that these projects often fail to deliver on their promises and can result in significant environmental and economic harm.

First and foremost, the environmental impacts of WtE plants are considerable and well-documented. These facilities can produce toxic waste and air pollution, contributing to climate change and posing severe health risks to local communities. The incineration process releases pollutants such as nitrogen oxides, sulfur oxides, particulate matter, and harmful substances like polychlorinated dibenzodioxins (PCDDs) and dibenzofurans (PCDFs). Additionally, the bottom ash, or slag, generated by these plants can contain high levels of heavy metals and dioxins, which, if not properly managed, can cause leachate problems, contaminating soil and water sources.

Moreover, the economic feasibility of WtE projects is questionable. The construction and operation of these facilities require substantial investment, with costs significantly higher than alternative energy sources. Investment costs for WtE plants can be three times higher than for woodchip combined heat and power (CHP) plants and four times higher than for pulverized coal power plants. This financial burden can strain the already limited resources of our community and divert funds from more sustainable and cost-effective solutions.

Furthermore, WtE plants can undermine more sustainable waste management practices and renewable energy initiatives. By focusing on incineration, we risk destroying valuable materials that could otherwise be recycled or composted, thus promoting a less circular economy. Additionally, reliance on WtE technology can discourage investment in and the development of truly renewable energy sources, such as solar, wind, and hydroelectric power, which offer long-term benefits without the associated environmental and health risks.

The experiences of communities around the world highlight the potential negative consequences of WtE projects. In Delhi, India, for instance, local residents and waste pickers have protested against an incinerator plant due to concerns over air quality degradation and job threats. Their plight serves as a cautionary tale, reminding us to carefully scrutinize the promises of WtE technology and to prioritize the health and well-being of our residents and environment.

I used to live near a solid waste incinerator in Rahway, New Jersey, and can testify to issues like air pollution, health risks, environmental contamination, unpleasant odors, noise, regulatory violations, and high costs.

In light of these considerations, I urge the United States Virgin Islands Public Services Commission and the Water and Power Authority to reconsider the proposed WtE project for St. John. Instead, I advocate for exploring alternative waste management solutions that emphasize reduction, reuse, recycling, and composting, alongside investment in truly renewable energy sources. Such an approach will not only protect our environment and public health but also ensure a more sustainable and economically viable future for our community.

The promise to convert all the garbage on St. John into fuel for a power plant sounds 'too good to be true' because this proposed project is built on a foundation of lies.

Thank you for your attention to this critical issue.

Sincerely,



Lisa McCormick