

August 26, 2024

Secretary Jennifer Granholm
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Jigar Shah, Director
Director, Loan Programs Office
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Granholm and Mr. Shah:

The undersigned 106 organizations urge you to withdraw \$182 million in conditional loan guarantees for the proposed International Recycling Group (IRG) facility in Erie, Pennsylvania, and a steel mill in northwest Indiana. Infrastructure Investment Act funds from Title 17 Clean Energy Financing Program should not be used on a false solution to the intersectional climate and plastics crisis. We are deeply concerned about the department's support for burning plastic in steel mills for two main reasons: pollution from this project is an enormous threat to these communities, as well as Lake Erie, Lake Michigan, and Indiana Dunes National Park. Second, burning plastic undermines waste reduction.

This funding decision touts support for the Biden administration's Justice40 Initiative, which establishes the goal that 40% of the overall benefits of certain federal investments, including Loan Program Office financing, flow to communities that are marginalized by underinvestment and overburdened by pollution. It is true that the Erie and Gary communities are historically underserved, yet this project threatens to worsen public health issues they already endure.

- In Erie, should the facility become the "largest of its kind in the country," massive increases truck traffic bringing plastic waste from a 750 mile radius, fugitive emissions from extrusion and processing, and the release of plastic waste at each stage of handling pose additional risk to workers, residents, and water resources in this Great Lakes community. This facility also presents a fire risk.
- The shredded "CleanRed" (a greenwashed term) plastic waste from IRG's facility would be burned in blast furnaces in northwest Indiana, presumably Gary, an EPA-designated environmental justice community. The toxic pollution from plastics burning may be even greater than coal due to the 16,000 chemicals used in the production of plastic. At least 4,200 of those are considered to be "highly hazardous" to human health and the environment. Many of the chemicals haven't even been tested for their toxicity. Burning plastic emits volatile organic compounds, heavy metals, PFAS, dioxins, and furans, which are persistent in the environment.

We are also concerned about the risks to Lake Erie, Lake Michigan, and Indiana Dunes National Park, which is adjacent to three steel plants, including U.S. Steel Gary Works Steel Plant. DOE named Gary Works in a letter about this project dated August 1, 2023. Indiana Dunes is the most ecologically diverse area in the state, and unique among national parks, providing habitat for more than 350 migratory bird species and 1,400 plant species. The park is among the busiest on the Great Lakes, welcoming 3 million visitors each year. Toxic pollution from plastic burning should not be part of the experience of visiting this treasured park or the Great Lakes.

Further, a commitment to funding plastic burning would have a cascading effect on waste generation. The U.S. already relies on more than 70 expensive, highly polluting trash incinerators, most of them aging. The DOE should prioritize phasing out incineration by focusing on source reduction of problematic materials like plastic, rather than investing more funds in new waste burning projects. Waste-burning undermines waste-reduction: as an economic model, burning creates a consistent demand for waste and a financial disincentive to reduce waste at the source.

Burning plastic in place of coal is not a climate solution, it merely substitutes one form of fossil fuel with another. Plastics are made from hydrofracked ethane, oil, and even coal, and the carbon footprint of plastic is immense from production to disposal. A 2021 report from Beyond Plastics found that in the U.S. the emissions from plastic production, use, and disposal are on track to exceed emissions from coal fired power plants by 2030. What's more, blast furnaces are rapidly becoming obsolete; plastic pellets and other halfway measures delay investments needed to replace blast furnaces with greener steelmaking technologies.

Spending crucial climate funding from the Inflation Reduction Act on burning plastics perpetuates a cycle of inefficiency and environmental harm without providing substantial benefits, as U.S. production of plastic from fossil fuels increases year over year. Quite frankly, it does not inspire confidence in the Department of Energy and how the agency is making funding decisions. The return on investment would be exponentially greater were these funds instead spent on effective climate and waste solutions like reuse and refill infrastructure to replace single-use materials, and redesign of products and packaging to be plastic free.

We urge you to withdraw this loan guarantee and appreciate the opportunity to meet with Jigar Shah in the coming days. Please contact Judith Enck, president at Beyond Plastics, at judithenck@bennington.edu with any questions. Thank you for your consideration.

Sincerely,

Russ Taylor, Our Water, Our Air, Our Rights, Erie, PA

Jenny Tompkins, PennFuture, Erie, PA

Mary Nelson, NETWORK Advocates of Northwest PA, Erie, PA

Art Leopold, Hold Erie Coke Accountable, Erie, PA

Stephanie Schmidt, Benedictine Sisters of Erie, Erie, PA

Melinda Hall, Erie Episcopal, Erie, PA
Deb Seng, Sisters of St. Joseph of Northwestern PA, Erie, PA
Pat Lupo, Inner City Neighborhood Art House, Erie, PA
Katherine Green, Kind Veg, Erie, PA
Karen Feridun, Better Path Coalition, Kutztown, PA
Debra Smit, Breathe Project, Pittsburgh, PA
Liz Green Schultz, Clean Air Action, Philadelphia, PA
Alex Bomstein, Clean Air Council, Philadelphia, PA
Josephine Gingerich, Climate Reality Project, Stroudsburg, PA
Mike Ewall, Energy Justice Network, Philadelphia, PA
Alison Steele, Environmental Health Project, Pittsburgh, PA
Shannon Smith, FracTracker, Pittsburgh, PA
Barbara Brigham, Medical Mission Sisters, Justice Office, Philadelphia, PA
Ashley Funk, Mountain Watershed Association, Melcroft, PA
Tamela Trussell, Move Past Plastic, Carlisle, PA
Edward Ketyer, Physicians for Social Responsibility, Venetia, PA
Sandy Field, Save Our Susquehanna, Lewisburg, PA
Eileen Marnien, Sisters of Saint Joseph Philadelphia, Philadelphia, PA
Heather Hulton VanTassel, Three Rivers Waterkeeper, Pittsburgh, PA
Doreen Carey, Gary Advocates for Responsible Development (GARD), Gary, IN
Ben Inskeep, Citizens Action Coalition, Indianapolis, IN
Michael Zoeller, Conservation Law Center, Bloomington, IN
Sam Carpenter, Hoosier Environmental Council, Indianapolis, IN
Susan Thomas, Just Transition Northwest Indiana, Beverly Shores, IN
Judith Enck, Beyond Plastics, U.S.
Lisa Ramsden, Greenpeace USA, Washington D.C.
Kate Donovan, Natural Resources Defense Council, U.S.
Sarah Doll, Safer States, U.S.
Paulita Bennett-Martin, 5 Gyres Institute, US
Belinda Chiu, A Healthy Blueprint, New York, NY
Jennifer Hadayia, Air Alliance Houston, Houston, TX
Mary Lou Nicholson, Be the Solution to Pollution, Providence, RI

Peggy Ann Berry, Between The Waters, Dayton, OH
Marité Ball, Blue & Green Planet, Ltd, Aurora, OH
Graham Hamilton, Break Free From Plastic Coalition U.S.
KT Morelli, Breathe Free Detroit, Detroit, MI
Vicky Abou-Ghalioum, Buckeye Environmental Network, Columbus, OH
Brian Eden, Campaign for Renewable Energy, Ithaca, NY
Molly Hauck, Cedar Lane Environmental Justice Ministry, Kensington, MD
Emily DiFrisco, Center for Environmental Health, Oakland, CA
Barbara Weckesser, Cherokee Concerned Citizens, Pascagoula, MS
Mary Smith, Church Women United in New York State, Rochester, NY
Bob Cohen, Citizen Action of New York, Albany, NY
Tracy Frisch, Clean Air Action Network of Glens Falls, Glens Falls, NY
Catalina Wagers, Cleveland Heights Green Team, Cleveland Heights, OH
Laurie O'Loughlin, Climate Crisis Working Group of Moore County NC, Pinehurst, NC
Laura Gardner, Climate Reality Project Massachusetts Southcoast, Fairhaven, MA
Graham Hughes, Climate Solutions Accelerator of the Genesee Finger Lakes Region, Rochester, NY
Becky Meier, Community Advocates for a Sustainable Environment, Canaan, NY
Maya Rommwatt, Defend Our Health, Corpus Christi, TX
Reg McKillip, Dominican Sisters of Sinsinawa, Sinsinawa, WI
Kathryn Savoie, Ecology Center, Detroit, MI
Karen Wirsig, Environmental Defence Canada, Toronto, Ontario
Yvette Arellano, Fenceline Watch, Houston, TX
Lea Harper, FreshWater Accountability Project, Grand Rapids, OH
Paloma Henriques, Friends of the Earth, Washington D.C.
Jessica Roff, GAIA (Global Alliance for Incinerator Alternatives), Berkeley, CA
Sandy Przbylak, Green Party of New York. Buffalo, NY
Jenna Valente, Healthy Ocean Coalition, Cumberland, ME
Daniel Winston, Impact Appalachia, Wellsville, OH
BJ McManama, Indigenous Environmental Network, U.S.
Kirstie Pecci, Just Zero, New England
Rebecca Martin, Kingston Citizens, Kingston, NY

Jan Dell, Last Beach Clean-up, Dana Point, CA
Kate Jakubas, Meliora Cleaning Products, Chicago, IL
Cheryl Nenn, Milwaukee Riverkeeper, Milwaukee, WI
Cynthia Palmer, Moms Clean Air Force, U.S.
Cari Gardner, New York Progressive Action Network, Athens, NY
Anshul Gupta, New Yorkers for Clean Power, Kingston, NY
Jerry Rivers, North American Climate, Conservation and Environment(NACCE), Roosevelt, NY
Ruth Foster, NY Climate Advocacy Project, East Greenbush, NY
Jill Hunkler, Ohio Valley Allies, Barnesvill, OH
Hannah Fine, Only One, US
Dante Swinton, Our Zero Waste Future, Baltimore, MD
Michelle Sherman, Pax Christi USA, Washington D.C.
Jennifer Morin-Williamson, Peace, Justice and Ecology Department of the Sisters of the Precious Blood, Dayton, OH
Doug Couchon, People for a Healthy Environment, Elmira, NY
Cheryl Johncox, People Over Petro Coalition, U.S.
Lindsey McCoy, Plaine Products, Cincinnati, OH
Dianna Cohen, Plastic Pollution Coalition, Washington D.C.
Emy Rodriguez Rancier, Plastic Solutions Fund, Montclair, NJ
Bill Davis, River Alliance of Wisconsin, Madison, WI
Cristina Mittermeier, SeaLegacy, Great Falls, VA
Madeleine MacGillivray, Seeding Sovereignty, New York, NY
Yvonne Taylor, Seneca Lake Guardian, Watkins Glen, NY
Stephanie Blumenthal, Sheffield Saves, Sheffield, MA
LaDonna Manternach, Sisters of Charity, BVM, Dubuque, IA
Jean Stokan, Sisters of Mercy of the Americas - Justice Team, Silver Spring, MD
Lynn Anderson, SOBE Concerned Citizens, Youngstown, OH
Kevin Greene, Sustainable Tucson, Tucson, AZ
Mary Aguilera, Tackling the A-Z Impacts of Plastic and Petrochemicals, Palmetto, FL
Robin Schneider, Texas Environment, Austin, TX
Jackie Nuñez, The Last Plastic Straw, Aguadilla, PR
John Blair, Valley Watch, Inc., Evansville, IN

Roishetta Ozane, Vessel Project of Louisiana, Sulphur, LA

Nada Khader, WESPAC Foundation, Inc., White Plains, NY

Beth Neary, Wisconsin Environmental Health Network, Madison, WI

Jeri White, Zero Waste McMinnville, McMinnville, OR

Yayoi Koizumi, Zero Waste Ithaca, Ithaca, NY

Jane Selden, 350NYC, New York, NY

Annie Stuart, 350 Petaluma, Petaluma, CA