

Whatcom Environmental Council

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April 27, 2026

To: Bellingham City Council and Mayor Kim Lund

Subject: Post Point Incinerators

Dear City Council and Mayor,

As a recently retired waste industry professional who served our community for over 30 years, I am writing today to correct what I see as numerous factual errors and misinformation regarding safer and cheaper handling of our toxic sewage sludge at Post Point.

What is our request?

1. In the interest of public health and fiduciary responsibility, the City of Bellingham should pause issuance of a \$65M contract on our obsolete incinerators, and,
2. Instead, with state and local agency assistance promptly issue RFPs for design and installation of a system to load out sludge for temporary landfilling, and shut down incinerators while the City pursues a robust bid process for alternatives to incineration.
 - First, a comment on the LLLL emissions standard the City says it will achieve by spending \$65M of local families' money over the next 5-7 years. It was last set in 2011, long before the scourge of so-called "forever chemicals" like PFAS was understood. By the time the new equipment is fully operational, around 2033, it will be supposedly meeting a safety standard set in 2011 that is no longer protective of human health.
 - Secondly, no upgrade to our incinerators can be done to enable full destruction of PFAS - they are low temperature furnaces, period. So as long as they are running, they are dumping such toxics into the air we breathe and Bellingham Bay.
 - Thirdly, in 2019 the City conducted a robust public process that examined all possible technologies for sludge handling. Why in 2024, did the City RFP only ask consultants to study incineration? Surely other technologies had advanced in five years? Why not look for safer and cheaper alternatives?

Now, let's examine each stage of a temporary shift to landfilling, while the city shuts down our polluting incinerators and openly and swiftly studies all alternatives.

Loading Sludge Boxes

City staff estimates to design and build a sludge loading facility at Post Point requires 4 years at a cost of \$7M. A similar facility built in 2023 and now in full operation in Lynnwood, took only ~18 months to design and build, at a cost of ~\$1.8M. A basic overhead loading system in a covered parking bay will move the sludge from the centrifuge conveyor into haul boxes, the same boxes that have hauled Post Point's ash for years. The roof keeps rain out and a negative air pressure system controls odors. It's a glorified garage.

The City says we can't compare facilities since Lynnwood is much smaller than Bellingham. Lynnwood's smaller sludge volume is irrelevant - local trucking can haul boxes as often as necessary. Bellingham only needs two boxes on site at a time, not TWELVE as City staff asserts.

Hauling to transfer on Slater Rd

City staff allege 3-4 hauls per day are required. Our daily average sludge weight per the City's own data files, is 42 tons per day. Each sludge box holds up to 29 tons. That's two boxes a day at 21 tons each, pretty basic math. The city's current ash hauler for Post Point has stated their ability to haul our sludge daily to a transfer station on Slater Road for ~\$375,000 a year. The same set up as now, the same boxes as now. Reliable and economical.

Sludge boxes are covered and sealed, ensuring minimal impacts during transport. Sludge does not have free liquid, but resembles damp peat moss.

The City cites concerns of higher charges for weekend hauls as justification for building an oversized load out building to store twelve boxes at once. Yet the City's current hauler of ash recently told me the sludge hauls would be the same cost as the ash haul, a flat rate, the same cost 365 days a year.

The City has noted concerns that haulers and landfill companies will increase rates unpredictably, upsetting city budgeting. Rate stability for hauls and disposal is ensured once RFPs are issued and met, and contracts are signed, just like the City does with dozens of other vendors. This is an administrative step, not some complicated chemical or mechanical challenge.

The City expresses concerns about capacity, and excess trips through Fairhaven. Two boxes a day have capacity for 58 tons, a daily sludge level not expected by the City's own projections until well beyond 2050.

Boxes can be hauled more often as needed at the same fixed rate, if a temporary surge in sludge occurs. The truck brings an empty box every time it hauls away a full box, so there's always 29 tons of capacity on site.

Haul from Slater Rd to Landfill

An RFP for landfilling will receive bids from the two large corporations who own and operate the landfills that have safely received all of Bellingham's solid waste for decades - Republic Services and Waste Management. Both have local transfer stations on Slater Road.

There has been no concern about the landfill capacity or the stability of these multi-national corporations for decades, as the City entered into contracts with them or their local subsidiaries. Both companies are capitalized between 80 and 100 BILLION dollars. Their landfills serve most of the Pacific Northwest, and still have 40 and 140 years of capacity respectively. The truck and rail companies are similarly very large, stable corporations with long records of safe operation. Adding 42 tons a day to companies that ship thousands of tons of waste per day is hardly a strain on their capacities.

- The City's Climate Plan lays out goals of reducing greenhouse gas emissions, yet has no concrete steps or plan to reduce the City's largest single source - Post Point's incinerators.

By contrast, closing the incinerators and hauling sludge to landfills by rail from Republic's yard on Slater or by trucks from Waste Management's yard on Slater will immediately reduce Greenhouse Gas emissions from handling our sludge by over 83%. Diesel emissions will be a tiny fraction of the stack emissions at Post Point.

What about GHG benefits at the landfill? Both large landfills have methane recovery equipment in place, which is processed to create renewable natural gas, credits for which the City could possibly negotiate within the landfill contract, further reducing Bellingham's climate impacts.

In contrast, Post Point incinerators have never, and do not today recover ANY energy from our sludge. They burn millions of BTUs of natural gas to incinerate sludge that is 80% WATER! That natural gas amounts to over 40% of all GHG impacts from City operations.

Landfill Costs

The City spreadsheet includes landfill costs out twenty years, at the same time that they claim landfilling is either illegal or impossible under state rules. Can't have it both ways.

The City's own data shows 2024's daily sludge averaged 42 tons, yet the City spreadsheet defending incineration alleges 71 tons per day. No wonder the City's cost estimate for landfilling is nearly double what it would actually cost.

The City says it expects to have an alternative technology in place in 10-15 years, but yet it calculates landfilling costs for 20? And if you're calculating out twenty years, then why hasn't the \$865M the City is budgeting for new technology been included?

The truth is NO ONE involved is suggesting landfilling for 10 or 20 years. We propose landfilling for at most 5 years, while the City responsibly and openly conducts a full technology review of safer, cheaper, more environmentally friendly alternatives, issues an RFP, and moves forward with the best alternative. Incineration and its pollution can stop as soon as load out equipment is installed at Post Point and contracts are signed with a local trucking company and one of the two landfills.

The City maintains landfilling is not permitted by state rules. At one meeting the mayor even stated it was illegal. Landfilling is not illegal. Under state rules it is discouraged over beneficial use. Guess what? So is incineration.

Our incineration is far worse than landfilling because we have ZERO energy recovery, our GHG emissions are sky high, and we are actively polluting local air and water with toxic chemicals from our sludge.

Temporarily landfilling stops almost all of that, immediately. Then moving swiftly to a better technology moves us even closer to our goals. Not starting 8 or 10 years from now, but starting to change NOW. A Department of Ecology biosolids manager told me their job is to help cities pursue their pollution reduction and safe sludge handling goals. They have done just that with other Washington cities. The City must ask DoE, NWCAA, and our local Health Department NOW, for help in pivoting away from incineration. If the City does that, our state and local agencies will help.

This issue has been described as “so complicated.” While the obsolete machinery at Post Point may be complicated, the issue before you is not. You can act on a known threat to our public health and to your fiduciary responsibilities, and take immediate steps to change course.

Your responsibility is to enter robust debate and research on an issue this large, and protect our physical and financial health as the top priorities. Post Point’s incinerators do not meet those tests any longer, and so you should direct the City to move swiftly to a safer, less costly, more transparent path.

A Better Path

Earthcare in Bethel, PA has operated a gasification plant handling municipal sewage sludge from multiple communities in New England for over a year. At this time sludge makes up the vast majority of the throughput on both their production lines. They have a modest tip fee compared to landfilling, they capture and reuse virtually all the energy from the sludge to run the plant, they destroy over 99% of all PFAS, and they create valuable biochar as a product. Biochar market value in western Washington is from \$100-\$500 a ton for various industrial, commercial, and agricultural uses. It’s not some fringe product. Generators (like Bellingham) can negotiate over the carbon credits inherent in biochar, turning our sludge from a liability to a public asset on climate change.

Earthcare has estimated they could, with a guarantee of receiving Post Point’s sludge, self-finance and build a \$40M plant with capacity of 200 tons per day, inside of 3 years. It could serve all of Whatcom and Skagit County’s needs including sewage sludge and Ag wastes. No public money, no double-digit sewer rate hikes, just a proven technology providing multiple benefits to our communities, not least of which is skilled technical jobs and an increased industrial tax base.

This should be a prime focus of an open and full technology assessment, and a detailed RFP. Gasification was dismissed by the City several years ago as “too cutting edge,” and the mayor and staff still hold to this outdated understanding of the industry.

The City, and over 24,000 local families can literally no longer afford to take this attitude toward now proven technology.

We urge you to pause approval of the \$65M contract, and direct the City to immediately contact all relevant agencies to assist in planning for an orderly shutdown of incineration and a pivot to temporary landfilling and a very public process of selecting an alternative that truly meets our community values and needs.

Sincerely,

Rodd Pemble
President, Whatcom Environmental Council