

Highways, Capital Development & Waste Management

Attn. of Diana and Clare

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24 November 2014

Dear Diana and Clare

Particulart Exhibition

After speaking with Councillor Croad it became apparent that he has not in fact responded to your letter regarding your Particulart exhibition and the questions that you raised. He is very apologetic regarding this oversight and has asked that I respond directly to the points that you raised.

I would like to reassure you that both the County Council, Exeter City Council and the Environment Agency will make sure that the plant is operated correctly and in accordance with its operating procedures, planning permission and the Environmental Permit by closely monitoring plant performance, emissions and contractual compliance.

The health risks from modern EfW plants operating to the latest standard are assessed as being of a negligible order. It is noted that there are more than 25 EFW Facilities already operating in the UK, with another 15 or so in various stages of being built, with hundreds more already in operation across Europe. All the plants operate under the EU Industrial Emissions Directive (previously the Waste Incineration Directive) and these have strict emission limits that are set in law through the Environmental Permit.

I am not aware of any peer-reviewed UK studies that conclusively link adverse health outcomes to EfW emissions. A 2004 Defra report concluded that there are 'no convincing links between EfW plant emission and adverse effects on public health. This is supported by the paper 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators' produced by Health Protection Agency, February 2010.

A copy of this report can be obtained from: www.hpa.org.uk

EfW plants, in common with all other combustion activities (including diesel engines and many other every day activities), emit particulate matter. However, the contribution of EfW to the overall inventory of particulate matter emissions in the UK is very small. Using Defra figures for 2012 (the latest available), EfW accounted for 0.06% of total particulate emissions and 0.05% of ultra-fine particulates (PM 0.1). The main source of ultrafine particulates in the UK is road transport.

A third of the plant is dedicated to filtering, cleaning and monitoring the emissions so this is something that is taken very seriously. Continuous emissions monitoring systems do measure total particulate matter which also includes fine particulates and ultra-fine particulates. There are emission limits in the Permit for total particulate matter although no specific separate permit limit is set for ultra-fine particulates. I understand that the periodic emissions monitoring undertaken for metals, dioxins, and poly-cyclic aromatic hydrocarbons (PAHs) includes both gas phase and particulate phases. Therefore any of these substances present as ultra-fine particulates will be detected.

A baseline survey of the site and its surroundings with regard to dioxins, metals and PAHs in soils was conducted. A monitoring plan is in place to identify representative monitoring sites, devise a sampling strategy and review the results of monitoring. This is not specifically aimed at ultrafine particles but assesses the total amount of these substances deposited and is a permit requirement. The HPA have issued guidance on this, which can be accessed via

http://webarchive.nationalarchives.gov.uk/20140714084352/http://www.hpa.org.uk/webc/HPAwebFile/HPAweb_C/1266228112244

As you know the plant has to operate to meet strict emission levels as set out in the Environmental Permit and this will be monitored by the Environment Agency as regulator. The operator has a duty under the permit to report an exceedance within 24 hours to the EA. In addition Exeter City have the responsibility to monitor air quality but the impact of emissions from the plant on overall air quality when compared to other activities such as traffic congestion is insignificant. The emissions data is now being made public on the TIRU website, and I attach a link <http://tiru-uk.co.uk/exeter/>

This will show any exceedances and these will also get reported through the Exeter Efw Liaison Committee which you attend on a regular basis.

As you state in your letter there is a degree of metal left in the bottom ash following the thermal process. The quantity of this metal is typical for a Efw plant but we are working with those District Councils who deliver waste into the plant to try to encourage residents to do more to ensure metals are put out for recycling when possible. The metal collected is sent for recycling. Exeter City Council has looked at the introduction of food waste but given the cost of providing additional collection receptacles and vehicle rounds it is currently unaffordable especially given the current austere times. However this is reviewed on a regular basis. The Resource and Waste Management Strategy for Devon was updated in 2103 and it sets out clear targets for recycling and composting. The document was adopted by the County and District Councils working in partnership and I attach a link for your information. http://www.devon.gov.uk/dcc_waste_strategy_review.pdf

There was a 'Recycle Now' campaign run recently in Exeter including bus shelter posters & bus boards around the city. This was done to try to encourage residents to recycle their waste as there was some concern that a degree of complacency may occur given Exeter's waste would no longer be going to landfill but would be used to generate energy. Clearly we still wish to promote that waste should be recycled where possible to do so.

The capital cost of the plant is £45.6 million which has been invested by Viridor as the County Council's waste disposal contractor for the Exeter Area. The County Council will pay back the cost of the capital investment as well as the operational costs of the plant over a 30 year period through a gate fee. The plant has been sized to ensure that there will always be sufficient waste to feed it and as such there are no plans to have to restrict recycling to feed the plant or bring waste from further afield than the area previously served

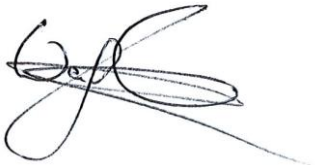
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by the old facilities. It is one of the smallest plants in the country and is proven technology. Energy generated by the plant is sold by Viridor to the National Grid and this does help offset the gate fee which the County Council pays. Whilst small plants do attract a premium rate the gate fee is comparable to landfill. There are however reduced transport costs as waste does not need to travel so far to be treated, and indeed is being managed in accordance with the 'Proximity Principle'.

With regard to the Government's Code of Conduct our understanding is that this relates to PFI contracts. The County Council is currently considering this code as it would relate to all County Council PFI contracts, not just waste related ones. However I can assure you that in these difficult financial times all waste contracts are being examined to see if any further efficiency savings can be made to try to ensure that we deliver as cost effective a service as possible.

Please contact me should you have any further queries and once again I apologise for the delay in responding to you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'W. Barratt', with a long horizontal flourish extending to the right.

Wendy Barratt
County Waste Manager