

ISSUES FROM CLP MEMBERS – April 2010

OUTSTANDING ISSUES FROM CLP MEMBERS

These are outstanding CLP issues raised to date that have yet to be addressed (as identified by the CLP Facilitator, Kate Fairweather):

Site Layout Issue

Follow up Question: *I'm sure it was covered of at an earlier meeting of the CLP but could Covanta do a quick reprise as to why the Covanta are siting the Project exactly where they are in Rookery Pit, i.e. adjacent to the country park and railway line and not in a less conspicuous quadrant in the Pit - e.g. the south eastern end of the Pit.*

Answer: LDA Design to respond and will be addressed in Design and Access Statement submitted with IPC application.

Plant Operation Issues

Further follow up Question: *The figures provided on how much oil the plant will use per annum to fire do not stack up - 1% of 585000 is 5850 tonnes **NOT** 530!*

Answer: The above 1% figure of 530 tonnes is based on energy value not by weight as assumed by the CLP member – see the further clarification below:

Energy Input from waste = 585,000 tonnes X 10.19 GJ/ tonne = 5,916,150 GJ

Energy Input from oil = 530 tonnes x 43 GJ/tonne = 22,790 GJ = 0.4% by energy = < 0.1% by weight

Because of the complexities of each EfW Facilities Covanta generally quote < 1% oil by energy.

Some EfW facilities, particularly smaller ones will require more standby generation as a percentage also some poor quality wastes may require extra support oil to maintain 2 seconds above 850C at all times.

Follow up Question: *If there is nothing dangerous coming out of the incinerator chimney, why does it have to be so tall?*

Answer: The key point to recognise here is that the emissions from the stack do have the potential to result in harm to human health and sensitive ecology **if** they occur at sufficiently high concentrations at ground level. The tall stack is required to ensure that the emissions are adequately dispersed and diluted in the atmosphere before reaching ground level, so that when they do so they do not occur at concentrations that may cause harm.

The EfW Facility is designed to minimise the emissions from the stack to acceptable levels and operates to stringent emission limits as stipulated in the Waste Incineration Directive (WID). Also within the Environmental Statement (ES) that will accompany the application to the Infrastructure Planning Commission and the Environmental Permit (EP) application to the Environment Agency, it must be demonstrated that the emissions from the Facility are not predicted to result in unacceptable harm to human health or sensitive ecology.

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In the forthcoming ES and EP application, dispersion modelling is used to accurately predict the impact on air quality from the pollutants emitted by the Facility. In addition, a study of the baseline air quality has also been undertaken, through additional monitoring and by making use of existing data. Using these data, the baseline pollution concentrations around the proposed Facility and at local population centres and sensitive ecological receptors has been established.

The results of the dispersion modelling are combined with the baseline pollution concentrations to predict what the likely future air quality will be. The modelling must prove that no air quality standard or guideline will be exceeded or approached (i.e. no more than 70% of the standard or guideline), or where the baseline is high that the contribution from the proposed Facility is less than 1% of the air quality standard or guideline. The stack height for the Rookery South EfW Facility is driven by the need to ensure that impacts at sensitive ecological receptors are less than 1% of the relevant assessment criterion, as the baseline concentrations of some pollutants at some sites are already greater than the guidelines.

In the case of air quality standards and guidelines for the protection of human health these are comfortably achieved at Rookery South (refer to Chapter 6 of the Preliminary Environmental Report, February 2010) and if these were the only consideration then the stack could be somewhat lower.

It is recognised that any additional pollutant burden may result in health impacts. The study undertaken and reported in the Preliminary Environmental Report quantifies the risks to health as a result of emissions. It identifies that the residual risks to health associated with emissions from the EfW Facility are negligible. This is in agreement with statements issued by the Environment Agency, Health Protection Agency and Committee on Carcinogenicity which confirm that the health effects associated with modern, well run facilities are not significant.

The final point to be acknowledged is that whilst it is recognised that there are emissions from the EfW Facility that have the *potential* to result in impacts to human health and sensitive ecology, the process should not be considered in isolation. The waste arisings treated at the Facility have to be treated somewhere and no treatment option is without environmental impact. As it is, this type of Facility is recognised as being one of the better options for treatment of these wastes as it is possible to recover energy from the waste and turn this into electricity and heat, it is possible to recover the bottom ash for use as aggregate and the process reduces the waste volume by 96% before a final disposal step.

Air Quality Question

Question: *Would Covanta please explain in detail how their proposed plant would filter out micro particulate dust particles below PM4.0. In particular, how would they propose to stop particles of PM2.5 and below from entering the atmosphere and hence the residents of the Marston Vale?*

Answer: The proposed Rookery South EfW Facility will be fully compliant with EU legislation that requires emissions of particulate matter to be strictly controlled and minimised.

It will be equipped with filtration equipment that operates at a removal efficiency of 99.9% or better, including for the PM2.5 size fraction. The residual PM2.5 emitted will result in a very small additional concentration of PM2.5 in the air that people

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breathe, which will be at least 200 times less than the PM2.5 concentration that is already present on Bedfordshire's air, at the most affected location. The health effect of this additional PM2.5 has been assessed explicitly within the EIA carried out to support the planning application.

Buckinghamshire Waste Procurement Bid

Question: *Also, could someone clear up the "legal" issue over the "ownership" of Rookery Pit or whatever it is that has meant that Bucks Council have gone back to WRG (and Covanta) and asked them to re-submit their final bids again? I'm not sure I completely understood the press release that was made public a few weeks (month?) ago that was along these lines.*

Answer: Covanta was awarded preferred bidder status in September 2009. Due to a commercially confidential issue, the procurement competition has reverted to the final stage as Buckinghamshire County Council considered that the issue potentially affects their evaluation of Final Tenders. The Council is not able to disclose precise details of the issue because the matter is commercially confidential (to Covanta). Disclosing details could prejudice the competitive element of the Authority's procurement procedure going forward and undermine the Council's ability to run the competition. Covanta remains committed to the procurement process, and the bid re-evaluation process does not change the company's belief that Rookery South Pit remains an ideal location for processing residual waste from both Bedfordshire and Luton and Buckinghamshire.

Response to review of CLP Feedback on the exhibition feedback form

"I agree with the CLP member's point about Covanta dismissing the question and was planning to raise it at the next CLP. Essentially Covanta have ruled out a valid and central question on a technicality. Given that the overwhelming local concern is the size of the proposed facility and that Covanta's argument for the size is the economy of scale – the public's opinion on the cost/benefit is central. I would be very interested in the answer to the question:

If *energy from waste is the best practical solution to Bedford's waste problem, would you rather have:*

- a. *A plant in Rookery pit that is sized to deal with Bedfordshire's waste only*

Answer: It would be misleading to consult on a scenario (i.e. a smaller plant) which Covanta Energy has no desire to progress. Consultation should be on the proposals not undeliverable options.

- b. *A plant in Rookery pit that will save the tax payers of Bedfordshire £10m per year by processing waste from Bedfordshire and neighbouring authority areas?*

There is nothing to stop the group asking this question of local people and presenting the evidence to IPC and others."

Answer: A minor correction point to note is that the stated level of potential savings is approximately £8 million not £10 million. The potential saving has been identified through the following approach:

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All Councils in the UK are having to look at alternatives to landfilling waste which cannot be sensibly and cost efficiently recycled or composted. From 2010, European and national laws impose heavy fines on Councils who fail to find alternatives to landfill.

At present Bedfordshire sends around 160,000 tonnes of waste to landfill every year (Source: Former Bedfordshire County Council). In addition to a service charge to dispose at a landfill site, each tonne of non hazardous waste is subject to the Landfill Tax, currently set at £48 per tonne and due to rise to £80 per tonne by 2014. In addition to this, all Councils will be subject to a fine (expected to be £150 per tonne) for every extra tonne of biodegradable municipal waste sent to landfill above the limit set by Central Government.

Covanta has calculated that on the current waste tonnages for Bedfordshire alone, utilising the Rookery South Resource Recovery Facility (RRF) will be **at least** £50 per tonne cheaper than a smaller 'Bedfordshire waste only' (bespoke sized) EfW facility.

E.g. 160,000 tonnes per year x £50/t = **£8million per year potential savings**

It's important to highlight, that Bedfordshire's Authorities are all seeking their own alternatives to landfilling and must abide by strict Local Government procurement rules of competitive tendering. Covanta hope that the Rookery South RRF will, in the future, provide Bedfordshire's authorities with the most cost efficient, proven and safe technological alternative to landfill and ensure that the cost savings can be realised. This is subject to the contract procurement process.

Question: *How much could Bedfordshire save?*

Answer: See above response.

Community Benefit Issues

Follow up Question: *Apparently Covanta have released a press statement to say they are proposing a Community Trust Fund related to the Rookery proposals.*

- 1. Why were the CLP not informed about this prior to the press release?*
- 2. Could you please ask how the proposed figures were established?*
- 3. Whom would they propose should administer such a fund?*

Answer: Covanta agreed sometime ago to present to the CLP on community benefits, part of which would include reference to the proposed Community Trust Fund. The agendas for the CLP meetings however have focused on other issues which the CLP has prioritised over the community benefits item that is why information on the Fund was not shared with the CLP prior to the press release. The proposed Fund is consistent with that offered on other projects being pursued by Covanta. The way in which the Fund could be administered is has been the subject of public consultation.

Photomontage issues

Follow up Question from presentation to Meeting 7: *Could a paper or electronic copy be provided of the photo montage shared with us at the last CLP of the view from Marston Moreteyne - there is no copy of it within the PER.*

Answer: Yes.

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Follow up Question: *Can you let me know if there are any views of the proposed plant from Houghton Conquest. I know there are additional photo montages that have been produced, but I wonder if there was anything from either end of the village where it joins the B530 (at The Grove or Bedford Road).*

Answer: LDA Design to advise at CLP Mtg 9