

*In a recent press release Councillor Tett proclaimed the “Independent” truth about incineration. How information from the Council, who have now become the opposition to the declared wishes of the electors, can be independent is extraordinary. Its curious veiled accusation of NIBYISM failed to recognise the irony that all of the councillors in the cabinet due to vote on this proposal all live in the South of the County, several adjacent to a site rejected because the lichen on trees would be damaged by the emissions.*

*Now in a briefing to Parish Councils there comes a series of misleading information. Much of it has an element of truth but has been carefully selected to mislead. This note addresses many of the half truths. It makes no spurious claims to be independent. The only way to reach any conclusion is to seek information yourself. If you want to pursue any of the arguments put, much can be confirmed by WEB searches. If that fails SAVI may be able to direct you to useful sources.*

*I have challenged Martin Tett on many of the assertions and he has simply failed to respond. Council officials may be able to help you but they seem to work at the limit of the 20 day response requirement but that should not stop you writing to them for information. They too have been unable or unwilling to justify many of the misleading assertions in materials published in the consultation process.*

*Using titles in the briefing note:-*

## 1. PROJECT HISTORY

The council appear to be abdicating the task of resolving what is the best process for Buckinghamshire to the companies seeking to use the best process for their profitability. Incineration, unlike any other of the processes considered, actually creates dioxins which are amongst the most toxic of chemicals. They can enter the food chain and thence the population or directly through flue emissions into the lungs of residents living in the shadow of the dispersal chimney. This is estimated to be significant up to 21 miles downwind of that proposed at Calvert. These are the same chemicals as in the toxic cocktail, which the Corby case dealt with and which has now been shown to have led to birth defects for 16 or 18 children.

If the only solution proposed by bidding contractors is a toxin generating one then it is the project criteria that is wrong. It is nonsense to accept a toxin generating solution just because there were defects in the tendering process.

Exactly the same argument applies to the location chosen. Calvert in the north of the county is wholly in contravention of the proximity principal (That waste should be processed as near to its source as practically possible) In Buckinghamshire two thirds of the waste is generated in the extreme south. Over one million lorry miles per year will be required to move the waste from either the optimum location or over the “Best” solution set out in the councils own consultation draft. The tail is wagging the dog. The council is simply accepting what the contractor proposes to suit his profitability target.

## 2 COMMUNICATION WITH RESIDENTS

The council has regularly misinformed residents rather than informed them. In the Buckinghamshire times in Spring 2007 it characterised the highly toxic residual fly ash as an alkaline compound which was useful in chemical processing. There has been no known use for this material as it is rich in dioxins. The council does not now support this false claim. In fact it is to be accumulated in a toxic waste pit on site so that by 2037 there will be about 300,000 tonnes. This will have to be managed not only for the 25 -30 years the council will be obliged to supply waste but in perpetuity. This week 18 deformed children won a historic court decision linking the clean up operation of Dioxin polluted ash at Corby to their deformities. It is intolerable that the council in its briefing to parish councils continues to characterise this as mainly toxic due to its alkalinity. This is a dangerous and irresponsible act of misinformation.

The 2005 so called consultation was a farce. The question put asked if “Only Tried and Tested Methods “ should be used. There was no comparative information offered on the dangers of incineration, indeed the process was not mentioned. There was no possible option for giving any sensible reply other than to agree. This was not informed consultation. The response from the whole of the county came from less than 1% of the population.

In its briefing there is no mention of the fact that at the so-called well attended meetings held last year there was almost universal hostility towards the project. When a professor from Birmingham was ridiculed for his inability to respond to simple questions about safety the meeting was prematurely brought to an end by the chairman. Councillor Tett acknowledged then that it was unsatisfactory but claimed it was a learning exercise. There is also no mention that Councillor Tett in a press release of 9 April 2008 was adamant that there was no consultation about the incineration project. The consultation appeared to be only on the developing Waste and Minerals Plan. This is the plan that is now being set aside. There has been no consultation on the incineration proposal nor on the 2007 decision to use thermal technology.

The briefing again fails to mention that the council has anyway decided it will not await the approval of that plan with its failings on proximity and many other aspects. It was silent on the importation of over two thirds of the waste to be burnt from London and elsewhere, as the operator can find out of County, suppliers of waste. Nowhere did it expose the opportunity required by proposed contractor to import toxic waste for disposal in the toxic waste cell that will be required. This may include hundreds of thousands of tonnes of toxic fly ash from incinerators in adjacent counties, including Oxfordshire. Nor did it mention that once the permit to operate a toxic pit is given many other types of toxic waste could then be imported into the county. This project offers the prospect of Buckinghamshire becoming a major depository of regional toxic waste. All of the so-called consultation suggested that the 200,000 tonne capacity would be directed to meet only the statutory requirement that we take London waste and to meet Buckinghamshire's needs. Nowhere was a 300,000 tonne unit making Buckinghamshire the regional repository mentioned.

Only once did the council announce in its literature that they had, without any consultation taken the decision in January 2007 to use incineration. The apparent

consultation was allowed to run on as if there remained a choice of methods. As late as spring 2008 in the Buckinghamshire Times their article still suggested several options remained open. Incineration was listed last almost as an afterthought. It is difficult to see how in any sense this could be classified as informed consultation. Indeed in failing to mention that the decision to accept incineration looks in retrospect nearer to deceit. It is almost certain that the consultation will not meet the counties own code of practice.

Councillor Tett has been asked if the consultation meets national guidelines on consultation but he has declined to reply.

### 3 RELATED ISSUES

#### HEALTH

The HPA has been asked about its position statement in the light of recent strong indicators that populations in the shadow of incinerators suffer significant increased adverse health effects. A strong indicator is the number infant deaths. They are still considering their position.

There is a more up to date paper known to the council, than any it chooses to quote, produced in 2008 by the British Society Of Epidemiological medicine which is clear that the most modern plant remains too dangerous to be contemplated. Yet this is not mentioned in its briefing. They also fail to say that in Ireland they have decided against any of these Incinerators and that this month the Scottish parliament decided that none are to be built there. The Welsh parliament has lent its support to a safer more enterprising method Near Merthyr Tydfil.

A paper by Dr D Shrenk is referred to. Martin Tett has been asked to justify his claim that this review paper, it was not a research paper, has been subjected to peer review. The paper only reviewed old research, prior to 2006, and included only papers NOT finding any adverse effects and failing to review any of those that were in existence at that time which did. He has not responded to that challenge and yet again it re-appears wholly unsubstantiated in the briefing.

#### EMISSIONS

The monitoring of flue emissions has almost always been from inside the top of the flue. (Without a floating balloon or sky hook it is difficult to do otherwise.) In modern EfW plants the particle formation most often takes place as the gasses cool. It is now known that to measure the smallest of particles it is necessary to monitor the gasses after leaving the flue where secondary formation takes place. In the research quoted from 2001 there was no useful data on ultrafine particles only on PM10. It is now known that in the cooling phase in the steam raising section of EfW plant there are more ultrafine particles produced than in older incinerators. The paper quoted is out of date and irrelevant to modern plant.

The quotation from the Lind paper is yet another example of misinformation. It may well be true that "...filter particle collection efficiency was 99.99% by mass" at the plants studied. However the proposal for Calvert is to burn 300,000 tonnes of waste.

This will distribute over one million tonnes of carbon dioxide into the air. (Scientists looking at other plant suggest that the figure should be around 2.1 million tonnes)

One Tonne is one millionth of this. One gramme is one millionth of that. The acceptable dose (The World Health organisation continues to maintain there is no minimum Safe dose) is 2 pico grammes. A picogramme is one millionth of one millionth of a single gramme. That is an indicator of how toxic these emissions are. For the measure of emissions by mass to be reassuring the result would have had to have been that the filters recovered 99.999 999 999 999 of the particles. They do not. In fact these fabric bag filters, just like vacuum cleaners, are very poor at catching the superfine particles. This is a wholly misleading, even if true, assertion.

Again the experience of Germany is quoted to be wholly misleading. The comparison is with old incineration plants and there is no question that overall mass of pollutant has diminished. But it is no indicator at all of the safety for residents in the immediate shadow of the plant nor does it take any account of the well known health effects of ultrafine particles. It is no part of Buckinghamshire County Councils role to sacrifice its residents to the well being of the nation as a whole. Particularly when there are safer alternatives available.

The reference to the role of the Environment Agency is again misleading. Monitoring is almost wholly done by the operating companies. The history of the existing plant in the UK is that there have been hundreds of minor breaches, so many that the Environment Agency can not bring prosecutions in all but a few cases. Prosecutions have been brought in several dozen cases including prosecutions for failures to report breaches. Even when serious breaches occur plant has not been shut down. A Nottinghamshire plant emitted nine times the permitted levels of dioxins. Because it was only monitored six monthly it was not know for how many months it had been going on and it was another six months before it was confirmed that the plant had been brought back on target. On another occasion the plant emitted twice the permitted level of Carbon Monoxide. What is known is that in both the shut down and start up phase the emissions are usually out of control parameters and the companies are exempted from reporting in both these phases. Martin Tett has been challenged to show when any plant has been shut down by the environment agency in any of the many major incidents but again he has simply failed to reply.

What makes these claims by the council appear to be particularly duplicitous is that one of the companies being considered has operated with abandon, often pleading guilty in magistrates courts where the penalties incurred are extremely limited. Waste Recycling Group have succeeded in obtaining a series of adjournments relating to breaches at the Calvert site so that the hearing on a prosecution at Aylesbury, where again they have succeeded in getting the case heard in the magistrates court, will occur after the council decision has been made.

## RESIDUES

Yet again another half-truth is included to suggest that metals can be recycled. What is not mentioned is that the toxic metals are the both least amenable to recycling and most prone to being emitted into the atmosphere as vapours. These include mercury and cadmium.

The classification as Alkalinity being the cause of classification of fly ash as toxic is extraordinary. At Byker in the North East attempts to use this material has blighted the lives of thousands and the clean up operation cost many millions of pounds, eliminating any potential cost benefit. It is the toxic effect of the dioxins which is the most damaging. As there is almost no breakdown of these compounds at ambient temperatures they will remain a threat in perpetuity. The council has made no declaration about how it intends to bond the operator for the cost of this burden. It may be that in the event of the company ceasing to trade that it will be the ratepayers of Buckinghamshire who will eventually shoulder this burden.

It may be that the council should be having second thoughts in the light of the extended case at Corby. Here the council was left with the burden of a clean up of a similar cocktail of toxic waste. It included dioxins, mercury and cadmium residues. They were last week found liable in a case in which 18 children were born with deformities to their limbs.

The aim of a leakproof cell is also novel. These open cells will have to have the leachate from rainfall pumped away and taken for processing every week for the foreseeable future. There is also a raft of reports available on the internet showing that the leakproof aim has seldom been met and that all cells eventually leak. The council seems quite content to ignore this reality.

## TRAFFIC

The traffic estimates were completed by consultants Jacobs in 2007 and included in a report in March 2008. They were based on a plant using 200,000 tonnes of waste and the assumption that most would come from London by train. There is now a one third increase in potentially road born waste needed to service the plant. The estimate was anyway judged by many to be an underestimate. In addition the forecast decline in London waste may again mean that the replacement needed to power the plant will come by road. There is no mention of the additional tankers required to take out the toxic leachate for processing.

At Nottingham, a plant operated by WRG was the subject of complaint that noise levels were exceeded. WRG argued that the noise was generated by the traffic. As the restrictive noise levels were set in the planning permission they only applied to the noise of the plant. WRG spent their money on arguing that case, and succeeded, and did nothing to alleviate the noise. The residents there now have a 12 hour delivery day where vehicle noise invades their lives continuously. This will affect only the immediate residents of Calvert Green, Edgecote and Grendon Underwood. Calvert and Edgecote will have the additional toxic waste tankers passing and the A41 and Waddesdon will have a substantial increase in the 40 tonne trucks passing. In addition traffic carrying any other toxic materials to the proposed hazardous waste pits may come through Edgecote and Calvert. The scoping document makes no proposals to improve the junction of the Edgecote road at the A41 so the peak hour congestion there must be expected to increase again pushing more traffic through Grendon Underwood.

The council has declined to consider health impact saying that it will be assessed by “Appropriate” consultants. Councils who have succeeded in forcing through these plants have frequently had recourse to consultants who are well known in this industry. There is no explanation forthcoming from the council as to what will qualify an “Appropriate” consultant. It is not even clear if the council will choose or if the contractor will choose. In either case there has to be concern that “Appropriate” means one that has repeatedly found plants of this type to inflict only acceptable health damage. As many understand the purpose of the high chimney is to spread the pollutants thinly enough to make the effects difficult to measure. It does nothing to stop the effects.

#### 4 FURTHER INFORMATION

The use of electricity from waste incineration is undoubtedly a benefit. However the same benefits can be generated from other waste processing methods which do not produce significantly different levels of Carbon Dioxide but those are not generators of the most Toxic pollutant dioxins. Simply there are better ways of getting the benefits.

There is no real prospect of any homes using the waste heat. In the UK there is almost no use made of the waste heat from power generation. This is another half truth, which has no realistic prospect of fulfilment. It is particularly futile in the rural location planned for the WRG facility.

In Germany there may be high waste recycling rates. If the council contracts to supply waste to WRG for this project recycling will have to remain at the modest rates now seen unless yet more waste is brought in from outside the county. Nottingham shows the effect of this double whammy. It has seen almost no reduction in its poor recycling rate since the operation of its incineration facility. It has blighted that area of the city with noise and dust and inhibited recycling.

The experience in other European Countries is not wholly a success. Notably at St Nicholas in Belgium the health damage was measured. The plant was shut down despite purporting to operate to the European Waste Incineration Directive after a judge had seen the evidence of the damage, particularly to children. In this country Kent County Council’s leader of a similar project has declared the project a disaster saying he now wishes he could escape from his contract as there are cheaper and better methods available. The plant itself has failed repeatedly to operate safely, and is at the moment being shut down again with the councillor openly expressing the hope that it does not reopen.

The briefing note finishes with yet another half-truth. Burying it in holes in the ground is not what we are doing now at Calvert, it is being piled up and there other better, safer, more economical methods available than incineration. These methods benefit from dispersed smaller capacity plant. The transport costs and pollution from noise and vehicles are reduced. No toxic waste chemicals are generated by the processes.

