

FOI

From: 1
Sent: 07 February 2012 13:09
To: 'psc@environment-agency.gov.uk'
Cc: 2
Subject: Ref: EA/EPR/VP3997NK/V003

Dear Environment Agency

Please find attached a response to the above application from the HPA.

Best wishes



2012_CarltonLan...

Environmental Public Health Scientist

Environmental Hazards and Emergencies Department
Centre for Radiation, Chemical and Environmental Hazards
Health Protection Agency
151 Buckingham Palace Road
London SW1W 9SZ

Office: +44 (0)20 7

Mobile: +44 (0

Email: psc@hpa.org.uk

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Centre for Radiation, Chemical
and Environmental Hazards



30

Environment Agency
PSC, EP Team
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Sheffield
S9 4WF

Health Protection Agency

Centre for Radiation, Chemical
and Environmental Hazards

Health Protection Agency
151 Buckingham Palace Road,
London, SW1W 9SZ

Tel +44 (0)20 7811 7141
chemicals.london@hpa.org.uk
www.hpa.org.uk

07 February 2012

Dear [3]

Environmental Permit application for Charlton Lane Eco Park, Charlton Lane, Sunbury, TW17 8QA.
Ref: EA/EPR/VP3997NK/V003

Thank you for forwarding a copy of this application to the Health Protection Agency on the 12th of January 2012. The enclosed documents comprised further information relating to a previous application for two environmental permits at the Charlton Lane Eco Park municipal waste management facility: a gasification facility and an anaerobic digestion facility with combined heat and power (CHP) units. The Health Protection Agency, via NHS Surrey, provided comments on the original application in February 2011. In our response, we highlighted the main area of public health concern was from emissions to air, and therefore have reviewed the documents pertaining to this here.

It should be noted that the pack we received from the EA contained a number of pieces of correspondence, corrections, multiple versions of the same documents and duplicates; we have therefore only considered the air quality information in the two documents marked 'FINAL', dated December 2011, which appear to be the latest versions.

Emissions to air

The applicant has provided an addendum to the atmospheric emissions assessment of the plant on the air quality in the surrounding area, as well as an addendum to the abnormal emissions assessment.

The applicant has carried out air dispersion modelling for the main pollutants of concern, including nitrogen dioxide, VOCs, PAHs, heavy metals etc. The model takes into account background levels of pollutants, local conditions and weather, and uses worst-case pollutant emission scenarios that consider contributions from both the gasification and CHP plants. The model shows that there are no sensitive receptors at the area with the maximum predicted contribution from the facility; in addition, at this point and at all sensitive receptors, the applicant has calculated that the health-based UK Air Quality Objectives and Environmental Assessment Levels are not exceeded in the short or long-term. The applicant also concludes that modelling of conservative, worst-case abnormal emissions scenarios (such as failure of flue-gas cleaning mechanisms), does not result in a breach of Air Quality Objectives or Environmental Assessment Levels.

The proposed plant will be situated in an urban area close to the M3 and M25 motorways, within an Air Quality Management Area (AQMA) for nitrogen dioxide (NO₂). We note that the contribution from the facility, along with the high background level of NO₂ (mainly due to motorway traffic), result in a predicted concentration that is very close to the NO₂ long-term Air Quality Objective. Uncertainties exist in any model and it is therefore important to ensure that the gasification and biogas burning CHP units do not adversely affect the local authority's attempts to reduce NO₂ concentrations in the area. Although not part of the environmental permit, the increased heavy goods traffic associated with the facility and the

potential for contributions from other sources - built recently or planned for the future - to background pollutant levels, could be considered.

The applicant has also conducted a Health Impact Assessment, which considers the long-term effect of emissions such as dioxins and heavy metals from the facility, including accumulative exposure from all potential routes (inhalation, ingestion of local produce etc). The assessment shows that the contribution from the facility would be negligible and would not exceed lifetime exposure levels. This finding is in line with the HPA position statement¹ that "Modern, well managed incinerators make only a small contribution to local concentrations of air pollutants. It is possible that such small additions could have an impact on health but such effects, if they exist, are likely to be very small and not detectable."

The applicant states that emissions from the gasification plant will be well within the limits set out in the Waste Incineration Directive (WID). The EA should ensure that the operator will meet the requirements of WID and that there are sufficient protocols in place to ensure any exceedances are reported.

Other emissions

The documents included clarification of noise, odour and dust abatement measures. The applicant states that ash from the gasification plant will be kept in sealed containers or dust suppression areas before processing / transfer. Given the proximity of residential receptors (~65m), the Environment Agency should ensure that these measures are sufficient to prevent dust having any off-site impact.

Recommendations

The Environment Agency should ensure that the mitigation measures to minimise air pollution detailed in the application are sufficient, such that the installation does not pose adverse impacts off-site. Particular attention should be paid to nitrogen dioxide and particulate matter, and the local authority should be consulted about potential new contributions to background concentrations from other sources nearby, and the impact that this may have on local air quality and the AQMA.

The Environment Agency should also ensure that the applicant has procedures in place to monitor and report any long-term exceedances of the Emission Limit Values, beyond those permitted under WID, and that where necessary these are reported to the health authorities in a timely manner so that potential public health impact can be assessed.

The response outlined in this representation is based on the following general assumptions:

- the permit holder shall be using 'best available techniques' in accordance with Article 2(11) of the IPPC Directive;
- comments will be sought from the Food Standards Agency for matters relating to impact on human health of pollutants deposited on land used for the growing of food crops or animal rearing; and,
- comments are sought from the local authority for matters relating to potential exacerbation in particulate matter air pollution within the AQMA and the impact on human health of noise, odour or dust nuisances.

①

Environmental Public Health Scientist

CC: *

②

Surrey and Sussex Health Protection Unit

¹ Health Protection Agency, Position Statement on Municipal Solid Waste Incineration
<http://www.hpa.org.uk/ProductsServices/ChemicalsPoisons/IntegratedPollutionPreventionControlIPPC/ipc/Incineration/>

FOI

From: i
Sent: 17 January 2014 18:39
To: 'psc@environment-agency.gov.uk'
Cc: 4
Subject: Environmental Permit application EPR/VP3997NK/V005
Attachments: EP_Draft Response template EPs v0.3 REVIEW Part A1_PHE.docx

Dear PSC

Please find attached the Public Health England response to the environmental permit application for Sita Surrey Ltd, ref EPR/VP3997NK/V005.

Best wishes

Environmental Public Health Scientist – Environmental Hazards and Emergencies Department
Principal Environmental Public Health Scientist – Extreme Events and Health Protection Department
Centre for Radiation, Chemical and Environmental Hazards
Public Health England
151 Buckingham Palace Road, London, SW1W 9SZ
Office: 020
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Environment Agency
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T: 020 7811 7141
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17 January 2014

Dear [redacted]

**Environmental Permit application for Sita Surrey Ltd, Charlton Lane Eco Park,
Charlton Lane, Shepperton, Middlesex, TW17 8QA
Reference: EPR/VP3997NK/V005**

Thank you for consulting Public Health England (PHE) on the above Environmental Permit application on 12 December 2013. It is understood that the application is for a variation to an existing EP for a waste installation comprising 3 gasification lines and an anaerobic digester with combined heat and power units.

The site is located in a predominantly urban area. The closest residential receptors to the site lie approximately 250m to the east of the site. The M3 motorway borders the north west corner of the site.

The facility will be located within an Air Quality Management Area for nitrogen dioxide (NO₂), which is borough-wide with annual Air Quality Objective (AQO) exceedances noted at numerous roadside locations. The modelled contribution from the facility shows it will contribute less than 1% of the AQO for NO₂ and will not lead to exceedances at local sensitive receptors, where existing background concentrations are lower than roadside locations. However, the overall concentration will be very close to the AQO for NO₂. We note that the NO₂ contribution from vehicle movements associated with the facility have not been included in the assessment, as this does not form part of the environmental permit. For this reason, PHE is concerned that the facility may impact upon the local authority's attempts to reduce NO₂ concentrations in the area and careful consideration should be given to this. Models showed that all other point source emissions to air, such as dioxins and particulate matter, would be below respective AQOs and environmental assessment levels.

We recommend that any Environmental Permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: point source emissions to air.

Based solely on the information contained in the application provided, PHE has no significant concerns regarding risk to health of the local population from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice. However, consideration is necessary of the context of the development in an air quality management area with existing elevated levels of NO₂.

In relation to potential risk to public health, we recommend that the Environment Agency also consult the following relevant organisation(s) in relation to their areas of expertise:

- the local authority for matters relating to impact upon human health of contaminated land; noise, odour, dust and other nuisance emissions;
- the Food Standards Agency, where there is the potential for deposition on land used for the growing of food crops or animal rearing;
- the Director of Public Health for matters relating to wider public health impacts.

Any additional information obtained by the Environment Agency in relation to these comments should be sent to PHE for consideration. Such information could affect the comments made in this response.

Yours sincerely

Environmental Public Health Scientist
_____@phe.gov.uk

CC: 6 Kent, Surrey and Sussex PHE Centre
i _____, Surrey County Council

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13 DEC 2013



FAO 4
Public Health England
Centre for Radiation, Chemical and
Environmental Hazards
151 Buckingham Palace Road
London
SW1W 9SZ

Our ref: EPR/VP3997NK/V005

Date: 12 December 2013

Dear 4

Consultation on environmental permit application

Application reference: EPR/VP3997NK/V005
Operator: Sita Surrey Ltd
Facility: Charlton Lane Eco Park, Charlton Lane, Shepperton, Middlesex, TW17 8QA

Please let us know when you receive this letter and whether or not you will be commenting on the enclosed application. You can email psc@environment-agency.gov.uk or write to us at the address below.

Please send any comments you have by **28 January 2014**.

Please be advised that this consultation has already been sent to the relevant Director of Public Health for assessment.

Please phone the permitting officer I on or email psc@environment-agency.gov.uk if you have any queries regarding the application.

Yours faithfully

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Permitting Support Advisor



N416.

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4
Training Administrator
Centre for Radiation, Chemical and
Environmental Hazards
2nd Floor
151 Buckingham Palace Road
London
SW1W 9SZ

Our ref: **EPR/VP3997NK/V003**

Date: **12 January 2012**

Dear | 4-0-000

Further application information for consultation

Application reference: EPR/VP3997NK/V003
Operator: Sita Surrey Limited
Facility: Charlton Lane Eco Park, Charlton Lane, Shepperton, Middlesex, TW17 8QA

Following our consultation on this Permit Application on the 21st January 2011 we have received the attached additional information. Please let us know when you receive this letter and whether or not you will be commenting on the enclosed additional application information. You can email name@environment-agency.gov.uk or write to us at Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Parkway Business Park, Sheffield, S9 4WF.

Please send any comments you have by 9 February 2012.

Please phone me if you have any questions on number or email me at the address above.

Yours sincerely

3
Permitting Support Officer

Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

FOI

From: Chemicals.london
Sent: 10 December 2013 08:36
To: >
Cc: Chemicals.london
Subject: FW: Pollution from Incineration of Municipal Waste
Attachments: 1-s2-0-S0160412012002279-mainIncindeaths.pdf; Re: Pollution from Incineration of Municipal Waste

Please see the enquiry below which was copied into the general enquiries email address for the EA, I have drafted a response and would be grateful if you could let me know if you or another EA colleagues would wish to add to this. We have had a subsequent email from the enquirer also attached, however we feel the response covers both enquiries.

Dear Mr Chester

Many thanks for your query. PHE does not generally comment on individual academic papers on incineration as such an approach would not be representative of the scientific literature as a whole.

Nevertheless, the paper by Garcia-Perez, Fernandez-Navarro, Castelló *et al* (2013) in Environment International volume 51, pp 31-44 concludes that there is *"a statistically significant increase in risk of dying from cancer in towns near incinerators and installations for the recovery or disposal of hazardous waste."* However, It is worth pointing out, that the study in question has a number of limitations including focussing on older generation incinerators i.e. those operating before the implementation of the EU Waste Incineration Directive (now superseded by the EU Industrial Emissions Directive).

It is therefore our view that the PHE (previously HPA) position statement on municipal incineration remains valid. This statement concludes that *"modern well managed incinerators make only a small contribution to local concentrations of air pollutants. It is possible that such small additions could have an impact upon health but such effects, if they exist, are likely to be very small and not detectable"* (HPA 2009)."

<http://www.hpa.org.uk/Publications/Radiation/DocumentsOfTheHPA/RCE13TheImpactonHealthofEmissionstoAirfromRCE13/>

The regulation of such facilities in England is the responsibility of the Environment Agency and operators are required to comply with the provisions of their Air Pollution License (APL) (to meet the standards required by the EU Industrial Emissions Directive). Any concerns in relation to the regulation and operations of the plant should be addressed to the Environment Agency.

The regulation of such facilities in England is the responsibility of the Environment Agency and operators are required to comply with the provisions of their Air Pollution License (APL) (to meet the standards required by the EU Industrial Emissions Directive). Any concerns in relation to the regulation and operations of the plant should be addressed to the Environment Agency.

Regards

Environmental Hazards and Emergencies Department (London)
Centre for Radiation Chemicals and Environmental Hazards (CRCE)
Public Health England
151 Buckingham Palace Road
London SW1W 9SZ

T:
M: @phe.gov.uk

www.gov.uk/phe

From: Giles Chester [mailto:gchester@email.com]

Sent: 05 December 2013 19:11

To: Chemicals.london

Cc: enquiries@environment-agency.gov.uk; NPCU@communities.gsi.gov.uk; defra.helpline@defra.gsi.gov.uk; privateoffice@no10.x.gsi.gov.uk

Subject: Pollution from Incineration of Municipal Waste

Dear Health Protection Agency,

I am writing to you in connection with the proposed 'Eco' Park in Charlton Lane, Shepperton, part of which will compromise a plant for the thermal treatment of municipal waste.

I refer you to the attached report by Environment International/Elsevier en-titled '**Cancer mortality in towns in the vicinity of incinerators and installations for the recovery or disposal of hazardous waste**'.

In particular I refer you to the conclusion on page 43 paragraph 5 which states:

5. Conclusion

"Our results support the hypothesis of a statistically significant higher risk, among men and women alike, of dying from all cancer in towns situated near incinerators and hazardous waste treatment plants, and specifically, a higher excess risk in respect of tumors the stomach, liver, pleura, kidney, and ovary. Furthermore, this is one of the first studies to analyze the risk of dying of cancer related with specific industrial activities in this sector at a national level, and to highlight the excess risk observed in the vicinity of incinerators and installations for the recycling of scrap metal and scrapping of ELVs, regeneration of spent baths, and treatment of oil and oily waste."

In an email to myself on 29th February 2012 you stated that 'The HPA's current position that well run and regulated modern municipal waste incinerators are not a significant risk to public health remains valid.'

However the attached comprehensive report would strongly indicate your position to be incorrect based upon more up to date, proven research and fact.

I would add , that in the case of the proposed thermal treatment plant in Shepperton, there is no basis that the plant will be 'well run'. The operator SITA have no experience of running the type of technology proposed and do not currently operate any similar type of incinerator anywhere.

Similarly, I refer you to the ScotGen thermal treatment plant in Dargavel, Scotland which had its permit revoked buy SEPA on the 23rd August 2013 due to multiple emissions breraches and the plant has since been destroyed by fire:

http://www.resource.uk.com/article/Waste_Law/Scotgen_permit_revoked_after_series_breaches-3554

The revocation notice, which was served on Friday (23 August), was issued for the following reasons:

- Persistent non-compliance with the requirements of the permit;
- Failure to comply with an enforcement notice;
- Failure to maintain financial provision and resources to comply with the requirements of the permit; and

- **Failure to recover energy with a high level of efficiency.**

According to SEPA, the revocation notice also requires Scotgen to take steps to 'avoid pollution and to return the site to a satisfactory state. This includes a requirement for the waste to be removed.'

The Dargavel plant is a similar type to that currently proposed in Shepperton, and in fact was the reference plant for the original design of incinerator intended before the supplier went bust. The new design has no reference plant anywhere in the same configuration as SITA intend to build. Therefore there must be strong doubt that this plant will be 'well run'

Taking all of the above into account, and the fact that the site in Shepperton will be less than 1 mile from several Primary schools, a matter of 100's of yards to residential homes, and is already in an Air Quality management area, I believe it would be considered reckless for the UK government to allow such a facility to built in such a highly populated area.

Furthermore, on the basis of the attached report, I consider the approval of such a plant in a highly populated residential area to be a breach of the human rights of the residents of the Borough of Spelthorne and it is my intention to petition the European Court of Human Rights on this basis should the UK government allow to proposal to go ahead.

I look forward to your reply,

Regards,

Mr Giles Chester

Lee Vasey

From: Giles Chester <gchester@email.com>
Sent: 09 December 2013 11:45
To: Chemicals.london
Cc: enquiries@environment-agency.gov.uk; NPCU@communities.gsi.gov.uk; defra.helpline@defra.gsi.gov.uk; privateoffice@no10.x.gsi.gov.uk
Subject: Re: Pollution from Incineration of Municipal Waste

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Health Protection Agency,

Further to my email of 5th December 2013.

I refer you to the below report in todays Dally Mirror:

<http://www.express.co.uk/news/health/447529/Even-safe-levels-of-air-pollution-can-harm-your-health>

Even 'safe' levels of air pollution can harm your health

AIR pollution can kill – even at so-called “safe” levels, according to the latest research.

Scientists have found that being exposed to levels well below European air quality limits is a major health risk.

In fact, prolonged exposure to particles of soot or dust in traffic fumes or industrial emissions may be more deadly than previously thought.

Research examining 20 years of data from 360,000 city residents in 13 European countries shows an increase of five microgrammes per cubic metre in annual exposure to fine-particle air pollution raises the risk of death by natural causes seven per cent.

Lead researcher Dr Rob Beelen, of Utrecht University in the Netherlands, said: "A difference of five microgrammes per cubic metre can be found between a location at a busy urban road and at a location not influenced by traffic.

"Our findings support health impact assessments of fine particles in Europe previously based almost entirely on North American studies."

Published in The Lancet, the research looked at data from 22 different studies. Annual average air pollution concentrations of nitrogen oxides and particulates were linked to home addresses and exposures estimated. Traffic density on the nearest road and total traffic load on major roads within 110 yards of the home were also recorded.

A total of 29,076 people died of natural causes during a follow-up period of just under 14 years.

Results showed that long-term exposure to fine particles with a diameter of less than 2.5 micrometres (PM2.5) posed the greatest threat – even within concentration ranges well below EU limits.

The association between prolonged exposure and premature death remained significant even after adjusting for factors such as smoking, social status, fitness, education and body-mass index. The researchers also noted PM2.5 was associated with excess mortality in men but not in women.

In a comment linked to the study, Dr Jeremy Langrish and Dr Nicholas Mills from the British Heart Foundation Centre for Cardiovascular Sciences at Edinburgh University, said: "Despite major improvements in air quality in the past 50 years, the data draw attention to the continuing effects of air pollution on health.

"These data, along with the findings from other large cohort studies, suggest that further public and environmental health policy interventions are necessary."

Speaking to the Daily Express, Dr Langrish added: "This is the first time a large European study has reported associations between air pollution and death and it has shown that at levels of air pollution that we are normally exposed to, and that are relatively low, they are still associated with increases in the risk of death."

You will be aware that Spelthorne is already in an Air quality management area, in the vicinity of Heathrow Airport, the M3 motorway and numerous gravel extraction/processing sites.

I re-assert that the UK Government allowing an un-tried un-tested Gaseification/Incinerator plant to be built in such a highly residential and already polluted area is reckless and against the human rights of the residents of Spelthorne.

Regards,

Mr Giles Chester.

FOI

From: > environment-agency.gov.uk>
Sent: 12 December 2013 13:21
To: Chemicals.london
Cc: Environment Agency
Subject: RE: Pollution from Incineration of Municipal Waste

– as discussed, we are content for you to reply
site specific follow-ups as and when.

- we will deal with any

Principal Officer Air Quality, Health & Transport
London Environment Team
South East

tel
@environment-agency.gov.uk

From: Chemicals.london [mailto:Chemicals.london@phe.gov.uk]
Sent: 10 December 2013 08:36
To: >
Cc: Chemicals.london
Subject: FW: Pollution from Incineration of Municipal Waste

Dear

Please see the enquiry below which was copied into the general enquiries email address for the EA, I have drafted a response and would be grateful if you could let me know if you or another EA colleagues would wish to add to this. We have had a subsequent email from the enquirer also attached, however we feel the response covers both enquiries.

Dear Mr Chester

Many thanks for your query. PHE does not generally comment on individual academic papers on incineration as such an approach would not be representative of the scientific literature as a whole.

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Regards

Environmental Hazards and Emergencies Department (London)
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From: Giles Chester [<mailto:gchester@email.com>]

Sent: 05 December 2013 19:11

To: Chemicals.london

Cc: enquiries@environment-agency.gov.uk; NPCU@communities.gsi.gov.uk; defra.helpline@defra.gsi.gov.uk; privateoffice@no10.x.gsi.gov.uk

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Similarly, I refer you to the ScotGen thermal treatment plant in Dargavel, Scotland which had its permit revoked buy SEPA on the 23rd August 2013 due to multiple emissions breraches and the plant has since been destroyed by fire:

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- Failure to comply with an enforcement notice;
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- Failure to recover energy with a high level of efficiency.

According to SEPA, the revocation notice also requires Scotgen to take steps to 'avoid pollution and to return the site to a satisfactory state. This includes a requirement for the waste to be removed.'

The Dargavel plant is a similar type to that currently proposed in Shepperton, and in fact was the reference plant for the original design of incinerator intended before the supplier went bust. The new design has no reference plant anywhere in the same configuration as SITA intend to build. Therefore there must be strong doubt that this plant will be 'well run'

Taking all of the above into account, and the fact that the site in Shepperton will be less than 1 mile from several Primary schools, a matter of 100's of yards to residential homes, and is already in an Air Quality management area, I believe it would be considered reckless for the UK government to allow such a facility to built in such a highly populated area.

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I look forward to your reply,

Regards,

Mr Giles Chester

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