

FOI

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From: PHE:  
Sent: 07 January 2014 09:54  
To: Chemicals.london  
Subject: RE: - incinerators

Marvellous, thanks 4

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From: Chemicals.london  
Sent: 07 January 2014 09:37  
To: PHE:  
Cc: Chemicals.london  
Subject: RE: - incinerators

Hi 3

Response for below.

"Dear r

Many thanks for your latest email.

With reference to your comments regarding air quality within Spelthorne Borough Council you may wish to review the 2012 Air Quality Updating and Screening Assessment for Spelthorne Borough Council, which states that previous air quality assessments have concluded that concentrations of carbon monoxide (CO), benzene, 1,3-butadiene, lead, sulphur dioxide (SO2) and particulate matter (PM10) are compliant with UK objectives. However concentrations of nitrogen dioxide (NO2) have been found to exceed the annual mean objective at various locations within the Borough. An Air Quality Management Area (AQMA) for the annual mean nitrogen dioxide objective was declared across the whole Borough in 2000.

<http://www.spelthorne.gov.uk/CHttpHandler.ashx?id=3902&p=0>

The assessment also highlights that a source apportionment study on behalf of the Council in December 2011 considered emissions to air of oxides of nitrogen (NOx) and particulate matter (PM10). The study found that the maximum contribution to the total emissions of NOx within Spelthorne is from road traffic, contributing 82% of emissions. The maximum contribution to the total emissions of PM10 was also from road traffic, contributing 87% of emissions.

The operations of the plant will be subject to control under an environmental permit. There is currently an opportunity to comment on the environmental permit application for the proposed incinerator:

<http://www.environment-agency.gov.uk/research/library/consultations/151313.aspx>

The HPA, now Public Health England (PHE), publication The Impact on Health of Emissions to Air from Municipal Waste Incinerators includes a list of references used in the production of the report on page 12. PHE reviews its advice in light of new substantial research on the health effects of incinerators published in peer reviewed journals. To date, PHE is not aware of any evidence that requires a change in our position statement.

Kind regards etc."

Cheers

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**From:** PHE  
**Sent:** 03 January 2014 13:16  
**To:** Chemicals.london  
**Subject:** RE: - Incinerators

Great, thanks 4

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**From:** Chemicals.london  
**Sent:** 03 January 2014 12:17  
**To:** PHE.  
**Subject:** RE: - Incinerators

Hi, 3

I will consider how best to respond and get back to you.

Regards

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Environmental Public Health Scientist, Environmental Hazards & Emergencies  
Public Health England  
[@phe.gov.uk](mailto:)  
Tel. :  
[www.gov.uk/phe](http://www.gov.uk/phe) Follow us on Twitter @PHE\_uk

**From:** PHE  
**Sent:** 03 January 2014 12:04  
**To:** Chemicals.london  
**Subject:** - Incinerators

Hi all,

See email reply from : re. incinerators.

2 prepared previous response – would you mind assisting with his latest email?

Thanks,

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Wellington House | Public Health England |  
[www.gov.uk](http://www.gov.uk)



**From:**  
**Sent:** 02 January 2014 17:14  
**To:** PHE.

Cc:

Subject: Re: Your emails to Public Health England

Dear

Thank you for your email dated 27th December 2013.

Firstly I would like to focus on one particular line of your reply.

**"It is widely accepted that exposure to ambient concentrations of air pollutants damages health"**

As you will see from my previous correspondence, the location for the intended incinerator is already an Air Quality management area due to many busy A roads, the M3 motorway, Heathrow Airport and numerous gravel extraction and aggregate recycling schemes.

So in the context of your response, you would have to agree that the residents of Spelthorne are already exposed to very high ambient concentrations of air pollutants including P.M. 2.5.

Therefore it can be safely assumed that ANY increase to air pollutants in this area would potentially increase the residents exposure and could be the difference between children getting cancer / asthma.

You will also be aware that the type of incinerator intended for Charlton Lane will routinely emit very high levels of pollution during normal start-up or shut-down of the plant. This cannot be avoided.

Similarly any failure of the equipment will again cause extremely high levels of pollution to be emitted. Both of these scenarios mean, that any particular time, the residents of Spelthorne could be exposed to very high isolated concentrations of dangerous pollutants.

You will be aware the European commission have stated that they are very concerned by the effect of P.M. 2.5 and intend to lower what is considered 'safe', and the USA already have significantly lower limits for P.M. 2.5 emissions.

You also state "However, modern, well managed incinerators make only a small contribution to local concentrations of air pollutants"

I again refer you to my previous correspondence about the ScotGen incinerator in Dargavel which was a reference plant for the site at Charlton Lane. A plant that was shut down by SEPA due to serial emissions breaches well above the 'safe' limit. The current proposal for Charlton Lane has no working reference plant anywhere and SITA have no experience in running this kind of incinerator. Therefore to assume this plant will be 'well managed' is a very dangerous assumption to make.

Finally, I would like to ask you to tell me what evidence HPE have used to arrive at their conclusion 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).

I am led to believe that it was all based on the HPA's own interpretations of previous studies, so it wasn't the latest work even then.

I await your reply with interest.

Regards,

----- Original Message -----

From: PHE

Sent: 12/27/13 11:16 AM

To:  
Subject: Your emails to Public Health England

Dear

Thank you for your recent emails to Public Health England (PHE) regarding incinerators. I have been asked to reply.

Studies published in the scientific literature showing health effects in populations living around incinerators have, in general, been conducted around older incinerators, with less stringent emission standards and cannot be directly extrapolated with any reliability to modern incinerators.

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 widely accepted that exposure to ambient concentrations of air pollutants damages health. Of the many pollutants found in ambient air, particulate matter has been studied in perhaps the greatest detail. However, 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. Estimates from the national atmospheric emissions inventory (2008) indicate that national emissions of particles from waste incineration are 0.04% of the total compared with 27% and 25% for Industry and traffic respectively.

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/>

I hope this information is helpful.

Yours sincerely,

Wellington House | Public Health England

[phe.gov.uk](http://phe.gov.uk)



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