

FOI

From: Chemicals.london
Sent: 28 January 2014 12:57
To: PHE.
Cc: Chemicals.london
Subject: RE: further email

Dear 3

Please see the approved response below

Dear

We believe we have previously addressed your queries in relation to incineration and the impacts on air pollution. The PHE statement on 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators' has very detailed information on particulate matter, PM₁₀ of which PM_{2.5} is a component. We will read or review any further communications from you and will reply if new issues of relevance to PHE have been raised, not previously covered in your correspondence.

Regards

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Environmental Hazards and Emergencies Department
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: PHE.
Sent: 10 January 2014 15:29
To: Chemicals.london
Subject: - further email

Hi all,

2 and 4 have previously provided lines in response to

See further email below. I'm happy to take your guidance on how to reply, but what I would say is that I don't think that he'll be happy, no matter how we respond/no matter what information we give him.

Let me know what you think.

Thanks,

3



From:
Sent: 09 January 2014 16:52
To: PHE
Cc: !
Subject: Re: Your further email to Public Health England

Dear

Thank you for your response.

Thank you for also confirming that the air in Spelthorne is affected by concentrations of nitrogen dioxide (NO2) that have been found to exceed the annual mean objective at various locations within the Borough.

I assume this means the air in Spelthorne currently has the potential to significantly affect human health as it breaches the 'safe' limits?

It would therefore follow, that a decision to build an incinerator which will only add to this pollution, even if in isolation the pollution produced by the incinerator is below the 'safe' limits, would be a decision that would cause the already un-safe levels of pollution to increase even further above the 'safe' levels, thus increasing the chances of significant harm to human health.

You also seem to have completely ignored Particulate Matter 2.5, the VERY dangerous stuff that is proven to cross the lining of the lungs and enter the blood stream, and known to significantly affect the health of unborn *fetuses* and *young children*.

I re-iterate, the European commission have stated that they are very concerned by the effect of PM 2.5 and intend to lower what is considered 'safe', and the USA already have significantly lower limits for PM 2.5 emissions based on advice from the WHO.

PM 2.5 cannot by its very nature (tiny particles) be cleansed from any emissions the proposed incinerator at Charlton Lane will produce.

What is it about PM 2.5 that Health Protection England believes that they can ignore and set 'safe' levels well above that recommended by the WHO?

Finally, may I kindly ask what your personal role/experience/qualifications are to qualify your answers to my questions, or if the answers to my questions are being provided by somebody else, may I kindly ask who they are and what their role/experience/qualifications are.

Regards,

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

From: PHE.
Sent: 01/07/14 01:41 PM
To:
Subject: Your further email to Public Health England

Dear

Thank you for your further email of 2 January to Public Health England.

With reference to your comments regarding air quality within Spelthorne 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 (NO_x) and particulate matter (PM₁₀). The study found that the maximum contribution to the total emissions of NO_x 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 Health Protection Agency, whose functions transferred to Public Health England on 1 April 2013, published 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators', which 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.

I hope this is helpful.

Yours sincerely,

[REDACTED]

Wellington House | Public Health England

[REDACTED]@phe.gov.uk



From: [REDACTED]
Sent: 02 January 2014 17:14
To: PHE, [REDACTED]
Cc: [REDACTED]
Subject: Re: Your emails to Public Health England

Dear [REDACTED]

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 this 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

 Public Health England

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