



NO COVANTA INCINERATOR

Points to Consider for your Submission to the Environment Agency

<https://consult.environment-agency.gov.uk/psc/mk43-9ly-covanta-energy-limited-1/>

Covanta as an Operator

We do not agree that the operating history of Covanta is acceptable - both for the 41 incinerator sites they run in the US (which have had 100 reportable incidents of significance in the last 5 years) and additionally the problems that have been experienced at the Poolbeg Dublin site. The serious issues experienced at Poolbeg have occurred since the closure of the 1st public consultation and therefore did not feature in any previous submissions. We also note that the Dublin Incinerator will be subject to the same EU laws as Rookery South.

In the decision document - the EA is claiming that incidents are merely learning lessons for Covanta. This is extremely worrying from a residents' point of view - who are looking at the EA to protect them and their environment - and do not wish to be used as a guinea pig for an American Company's purposes.

The EA also claims that any previous incidents are the responsibility of a different legal entity - however the main officers of all the various Covanta companies internationally - including the company involved in Poolbeg and the applicant for Rookery South - remain taken from a main bank of around 5 individuals.

Heat Export

We disagree with the EA's assessment of energy efficiency of the Rookery South Incinerator. Original IPC documents show that Covanta said they were keen to export heat to Center Parcs etc. We disagree with the EA's position that they are 'content' with Covanta's assertion that the export of heat is now suddenly not financially feasible due to "...physical restraints such as rivers, roads and railways that make heat supply not feasible". The location of the Incinerator has not changed in relation to the rivers, roads and railways.

Additionally in the Schedule 5 documents - Covanta now claim that Center Parcs has been designed in a way that makes it financially unviable to heat export to them despite the Woburn Center Parcs following a Company wide layout specification. Lockheed Martin has also been identified as a heat customer but Covanta claim this customer is likely to need high grade heat which they can not supply.

The Development Consent Order was issued under the impression that heat export was inevitable and not subject to problems with already existing features surrounding the pit. We believe that the EA has excepted false promises from Covanta regarding this aspect of the development - including not having any customers that are suitable for heat export in the surrounding area - only shows how unfeasible the location was in the first place. We also do not see how allowing the development to go ahead on this basis is reaching the EA's objective of supporting 'sustainable' development.

Temperature Inversion Events

We disagree that the EA has considered the impact on emission dispersal in relation to the temperature Inversion events that occur due to the geological aspects of the Marston Vale. The EA decision document claims to take into account 'local factors' however the main decision document does not even acknowledge the temperature inversion conditions and it is only discussed in the appendices where resident concerns are listed.

We do not consider a proper and thorough investigation into these events has taken place - as all the readings that the dispersion models rely on as being representative of the conditions in the Vale were taken from outside the Vale at Cranfield 5.5 Km away, Bedford 19 Km away and Luton Airport 23 Km away.

In the decision document - the EA admits that Covanta's modeling does not take into account temperature inversion - but it is claimed that the EA have "conducted a number of case studies investigating the likely dispersion impacts of such conditions". We can find no evidence of that these case studies have been included in the consultation documents.

We note that the EA's own weather data was taken from Bedford and therefore conclude that no attempt has been made to scientifically record the temperature inversion and therefore no conclusions can be accurately reached using case studies or recordings from outside the Vale. It is extremely concerning that the EA has no wish to gather the correct information to determine the environment impacts of the incinerator on the Marston Vale that could be in situ for up to 40 years.

Waste Codes allowed

We note that the EA is 'minded' to issue the permit to Covanta that includes codes for wastes allowed to be incinerated that should be dealt with higher up the waste hierarchy. For example 20 01 01 - Paper Card, 20 01 11 - Textiles and 20 01 39 - Plastic.

We assert that Covanta's justification regarding the need to incinerate these wastes shows a complete and total disregard for the waste hierarchy and government recycling aspirations.

The claim that this "...reflects the materials required to be burnt in other incinerators during the last 10 to 15 years of experience from Veolia as operators of other EFW plants in the UK." shows that Covanta have no intention of being part of a more progressive recycling and reducing society and this is far from the sustainable industry the EA claims to champion. To put this into context the recycling figures for England are 15 years ago - 12.8%, 10 years ago - 34.1% and 2016 was 42.4%. How can the EA justify allowing codes that do not define residual waste only?

Bottom Ash Storage

Schedule 5 #2 response shows that the IBAA storage yard will be enclosed by a 3M high wall (1.1). However - the same document states that the piles of IBAA could be 5M high 1.3 (4). We note the dust suppressant system proposed by Covanta for the piles of IBAA in the yard relies on manual inspection of the piles and then manual use of hoses. This seems to be very antiquated. To avoid dust contamination from the piles of IBAA they first of all need to be lower than 5M high to be contained - and then a regular scheduled system of automatic sprinklers should be deployed.

However - we note that Covanta have put forward an alternative solution that appears to feature in your decision document at 6.5.3 - of enclosing the IBAA storage area as a 'new building' - or transporting it off site to be stored elsewhere.

We believe that either of these solutions involve planning issues - for a new building to be added to the complex - or to increase the number of vehicles needed to access the site via Green Lane. The solution of transporting the IBAA off-site also has further environmental issues that you do not seem to have addressed - regarding the dust management in relation to the safe passage of the IBAA down Green Lane past the new local sixth form college.

Others points you may wish to mention

Fire Prevention

Covanta's proposed fire water tanks do not meet the guidance requirement of 2000 l/min for 3 hours. We note Covanta is suggesting to also use the water stored for use as process water as fire water. Given Covanta's history with fire outbreaks - we do not see why the EA should accept any suggestions that do not at least meet the guidance - if not surpass it.

Traffic Emissions

We note that the EA will not take into account the traffic movements outside of the site grounds. We believe that this will have a huge impact and should be the environmental agency's responsibility. The new Sixth Form College down Green Lane and the increased traffic from various new housing developments were not envisaged at the time planning was first granted in 2011. There is a total disconnect in this project between current Government policy, planning and environmental issues that needs to be addressed prior to the issue of any permit.