Richard Drax MP
Chesil House
Dorset Green Technology Park
Winfrith Newburgh
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25th January 2021

Dear Mr Drax

Tomorrow is MP's last chance to improve the Environment Bill

it seems every day I get an email imploring me to write to you.

This is good in so far as it connects you with your constituency but bad in that there is a sense that the press sense confidence in Parliament is at rock bottom. We urge you to ask questions in the House tomorrow so that best progress is made with the landmark Environment Bill.

The Energy from Waste Incineration UK Industry has very lax reporting of emissions. Of the 60 currently operating there are 14 which do not submit to the UK Pollution Inventory[1]. Of the best that does 64 pollutants are recorded yet the worst only identifies 8. The Environment Agency have the task of issuing permits and ensuring compliance to Best Available Technology. But since there is already such a divergence in standards this is obviously not currently working. Did you know that the Environmental Permit only requires continuous monitoring of some emissions but many are tested for every 6 months?[2] This is obviously not good enough BAT should be continuous monitoring to proper standards.

Table 4.1 Benchmark emission limit values for releases to air

Parameters	Parameters				Frequency requirements
	Units	½ Hour average –100% compliance (figure in brackets is ½ hour average – 97% compliance over a year, unless otherwise specified)	Average of ½ Hour averages over a 24-hour day (100% compliance unless specified)	Periodic	
Particulate matter	mg/m³	30 (10)	10	N/A	CEM[Note1] and bi-annual spot
VOCs (as total organic carbon, TOC)	mg/m³	20 (10)	10	N/A	CEM and bi-annual spot
Hydrogen chloride	mg/m³	60 (10)	10	N/A	CEM and bi-annual spot
Hydrogen fluoride	mg/m³	4 (2)	1 (or N/A)	N/A (or 4)	CEM and bi-annual spot (or, if HCl is abated and the plant is compliant for HCl: 6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours.
Carbon monoxide	mg/m³	100 (150 for 95% of all 10 minute averages)	50 (97% over a year)	N/A	CEM and bi-annual spot
Sulphur dioxide	mg/m³	200 (50)	50	N/A	CEM and bi-annual spot
NOx (NO and NO_2 expressed as NO_2) – existing plant > 6 t/h or new plant	mg/m³	400 (200)	200	N/A	CEM and bi-annual spot
NOx (NO and NO_2 expressed as NO_2) – existing plant > 6 t/h or new plant	mg/m³	N/A	400	N/A	CEM and bi-annual spot
Nitrous oxide [Note 2]	mg/m³	Note 3	Note 3	Note 3	CEM and bi-annual spot
Ammonia [Note 2]	mg/m³	Note 3	Note 3	Note 3	CEM and bi-annual spot
Cadmium and thallium and their compounds (total)	mg/m³	N/A	N/A	0.05	6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours
Mercury and its compounds	mg/m³	N/A	N/A	0.05	6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours
Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total)	mg/m³	N/A	N/A	0.5	6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours
Dioxins and furans (I-TEQ)	ng/m³	N/A	N/A	0.1	6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours
Dioxins and furans (WHO-TEQ)	ng/m³	N/A	N/A	Note 3	6 monthly sampling [3 monthly in first 12 months of operation]. Average value over sample period of ½ - 8 hours

Reference conditions: temperature 273K, pressure101.3kPa, 11% O_2 (except when burning waste oil only – 3%), dry gas.
Note 1: CEM is Continuous Emission Monitoring
Note 2: Applies to plants using SCR or SNCR to limit NOx releases
Note 3: Monitoring results to be reported for the first year of operation, and an ELV set on the basis of the results

Table 4.2 Benchmark emission limit values for releases to water

Parameters	Units	Emission Limit Values	Frequency requirements
Total suspended solids (from APC effluents) as defined in Directive 91/271/EEC	mg/l	<30 (95% of measurements) <45 (100% of measurement)	Spot daily sample or 24-hour flow proportional on a daily basis
Mercury and its compounds expressed as mercury (from APC effluents)*	mg/l	0.03	24-hour flow proportional sample on a daily basis
Cadmium and its compounds expressed as cadmium (from APC effluents)*	mg/l	0.05	24-hour flow proportional sample on a daily basis
Thallium and its compounds expressed as thallium (from APC effluents)*	mg/l	0.05	24-hour flow proportional sample on a daily basis
Arsenic and its compounds expressed as arsenic (from APC effluents)*	mg/l	0.15	24-hour flow proportional sample on a daily basis
Lead and its compounds expressed as lead (from APC effluents)*	mg/l	0.2	24-hour flow proportional sample on a daily basis
Chromium and its compounds expressed as chromium (from APC effluents)*	mg/l	0.5	24-hour flow proportional sample on a daily basis
Copper and its compounds expressed as copper (from APC effluents)*	mg/l	0.5	24-hour flow proportional sample on a daily basis
Nickel and its compounds expressed as nickel (from APC effluents)*	mg/l	0.5	24-hour flow proportional sample on a daily basis
Zinc and its compounds expressed as zinc (from APC effluents)*	mg/l	1.5	24-hour flow proportional sample on a daily basis
Total dioxins and furans (as I-TEQ) (from APC effluents)	ng/l	0.3	24-hour flow proportional sample on a daily basis
Total dioxins and furans (as WHO-TEQ) (from APC effluents)	ng/l	^	24-hour flow proportional sample on a daily basis
pH range #		Site specific	Continuous
Temperature #	°C	Site specific	Continuous
Flow #	l/s	Site specific	Continuous

* Limits for metals apply as 24-hour proportional flow samples. Only 1 sample per year or 5% of annual samples (where more than 20 are taken) may exceed the stated limits.
# Parameters to be measured and limits to be applied continuously.
^ Monitoring results to be reported for first year of operation – ELV to be set based on results

Emissions to Water and Sewer

- Where automatic sampling systems are employed, not more than 5% of samples shall exceed the benchmark value.
- Where spot samples are taken, no spot sample shall exceed the benchmark value by more than 50%.

How to comply with your environmental permit
Additional guidance for:
The Incineration of Waste (EPR 5.01)

Did you know that currently there is no EA scrutiny of what is used for fuel? The content of RDF is a commercial secret between the supplier and the end user. How can the toxicity of emissions be controlled if no one knows what is being burnt?

It was evident that you were unable to attend the Parliamentary Debate Westminster Hall Tuesday 12th Jan 2021 on Waste Incineration and Recycling Rates.
The Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs Rebecca Pow in summing up stated:
"the Environment Agency has said that ambient air monitoring around operating incinerators is not a reliable method of establishing the impact, as it does not identify the source of the emissions. We consider it better to use air dispersion modelling to predict the impact, based on the highest allowed emissions. We have audited the modelling and we are satisfied that it is suitable for assessing the impact from the installation. Hon. Members should note that Public Health England has stated that "modern, well run and regulated municipal waste incinerators are not a significant risk to public health." "

All data from the Air UK, the NAEI and the UNFCCC GHG emissions is based on agreed emissions factors multiplied by quantity. Given the constituent of RDF is extremely variable so is its toxicity.[3.] The Ministers statement on modelling is simply not good enough. How can one be reassured when the emission data for say mercury, lead and dioxins is only available every 6 months. The public want to be safe every day as I am sure you would be too.

One can understand why a Government would not want admit that dangerous practices do happen. But like smoking the population understand that lack of action and loose legislation is not right and in the end we all pay.
The Public Health England studies thus far are based on a very narrow remit on a small sample and is not convincing. Air Pollution is now identified as a cause of a child's death. Children are particularly at risk, with those who grow up in highly polluted areas four times more likely to have reduced lung function in adulthood.

Please will you attend the report stage of this important Bill, and support amendments that will bring the target for PM2.5,[4.] one of the most harmful pollutants to human health, in to line with the WHO's guidelines?

Yours sincerely

[redacted]

Paula Klaentschi

Coordinator

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Footnotes

1. The Environment Agency published https://data.gov.uk/dataset/cfd94301-a2f2-48a2-9915-e477ca6d8b7e/pollution-inventory the most recent is Pollution Inventory 2018.
2. Is this the detail set out in the document How to comply with your environmental permit Additional guidance for: The Incineration of Waste (EPR 5.01) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297004/geho0209bpio-e-e.pdf expected by such an application?
   There are some very questionable priorities in this document pg71
3. https://www.rdfindustrygroup.org.uk/code-of-practice/
4. https://laqm.defra.gov.uk/assets/63091defraairqualityguide9web.pdf Pg 13 <*Annual PM2.5 concentrations are associated with all-cause mortality to a high level of confidence, and with much greater certainty than in 2005 "There is no evidence of a safe level of exposure to PM or a threshold below which no adverse health effects occur"*