

Rookery South Energy Recovery Facility (ERF)

Community Liaison Panel

11th January 2021

Facilitator: Bob Fisher



Rookery South ERF – CLP Meeting January 2021

Agenda

1. Introductions/group ground rules (incl. terms of reference)
2. Apologies for Absence
3. Approval of notes from previous CLP Meeting
4. Construction Update (Jack Stitt – Project Manager)
5. Commissioning Phase Activities (Jack Stitt – Project Manager)
6. HGV Routing Strategy (Jack Stitt – Project Manager)
7. Operational Readiness (Ian Judd – Facility Manager)
8. Waste Delivery Update (Jacob Hall – Veolia)
9. Emissions Overview (Environment Agency)
10. Local Authority Monitoring (Anita Taylor – Planning Authority)
11. Rights of Way Strategy (Judith Harper)
12. Site Visits – Rookery; other facilities (Jack Stitt – Project Manager)
13. Stakeholder and local engagement (David Spencer)
14. Items for next meeting
15. Date of next meeting – 12th or 19th April TBC
16. AOB



Rookery South ERF – CLP Meeting January 2021

Introductions

Name	Role	Company	Responsibilities at Rookery
David Spencer	Communications Specialist	Covanta	Responsible for coordinating all external communication
Ian Judd	Facility Manager	Covanta	Responsible for Operation and Maintenance of the plant
Ian Morrish	General Manager	Rookery South Ltd	Overall responsibility for the business and stakeholders reporting to the shareholders
Jack Stitt	Project Manager	Covanta	Responsible for the management of the construction and commissioning phase
Jacob Hall	Fuel Supply Manager	Veolia	Responsible for the management of the waste supply to the plant
Judith Harper	Consultant	Rookery South Ltd	Supporting on planning, permitting and community interfaces
Marine Avisse	Corporate Development Manager	Veolia	Oversight of the development of the plant for Veolia
Neil Grimstone	Business Manager	Rookery South Ltd and Covanta	Supporting on commercial and technical procurement

Ground Rules & Protocols for the Remote Meeting

A set of ground rules agreed by the January 2020 meeting participants:

- Permission from attendees to record meeting (notation purposes only)
- Keep to time
- Keep to the agenda
- Respect each others' views
- Turn-taking - Do not speak over one another
- Mobile phones turned off/turned to silent

Protocol for Zoom Meeting:

- Microphones muted during presentations & cameras turned off
- Raise hand & use Chat mode
- No third party recordings, please



Construction, Commissioning and Highways Updates

Jack Stitt – Project Manager

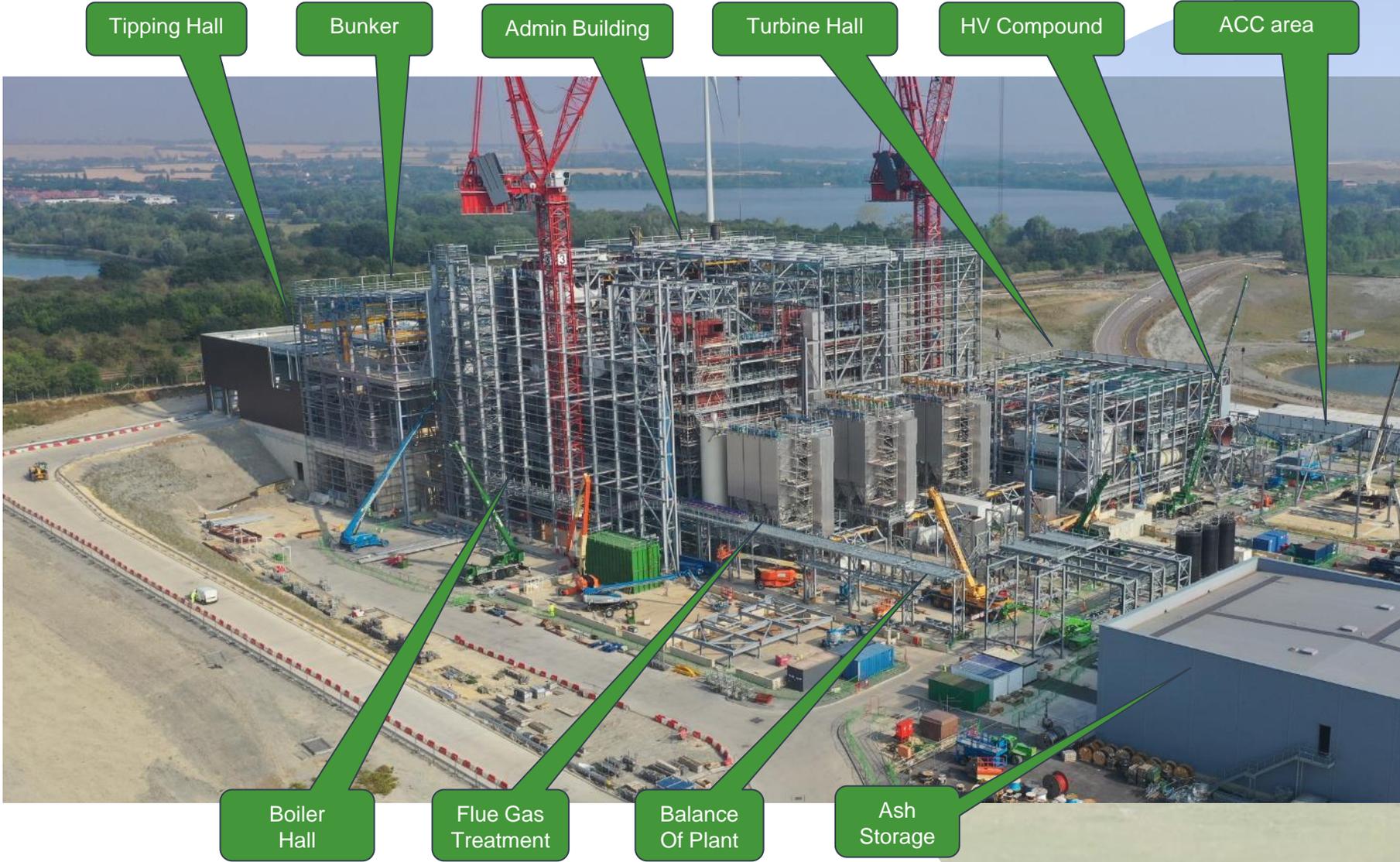


Construction Update

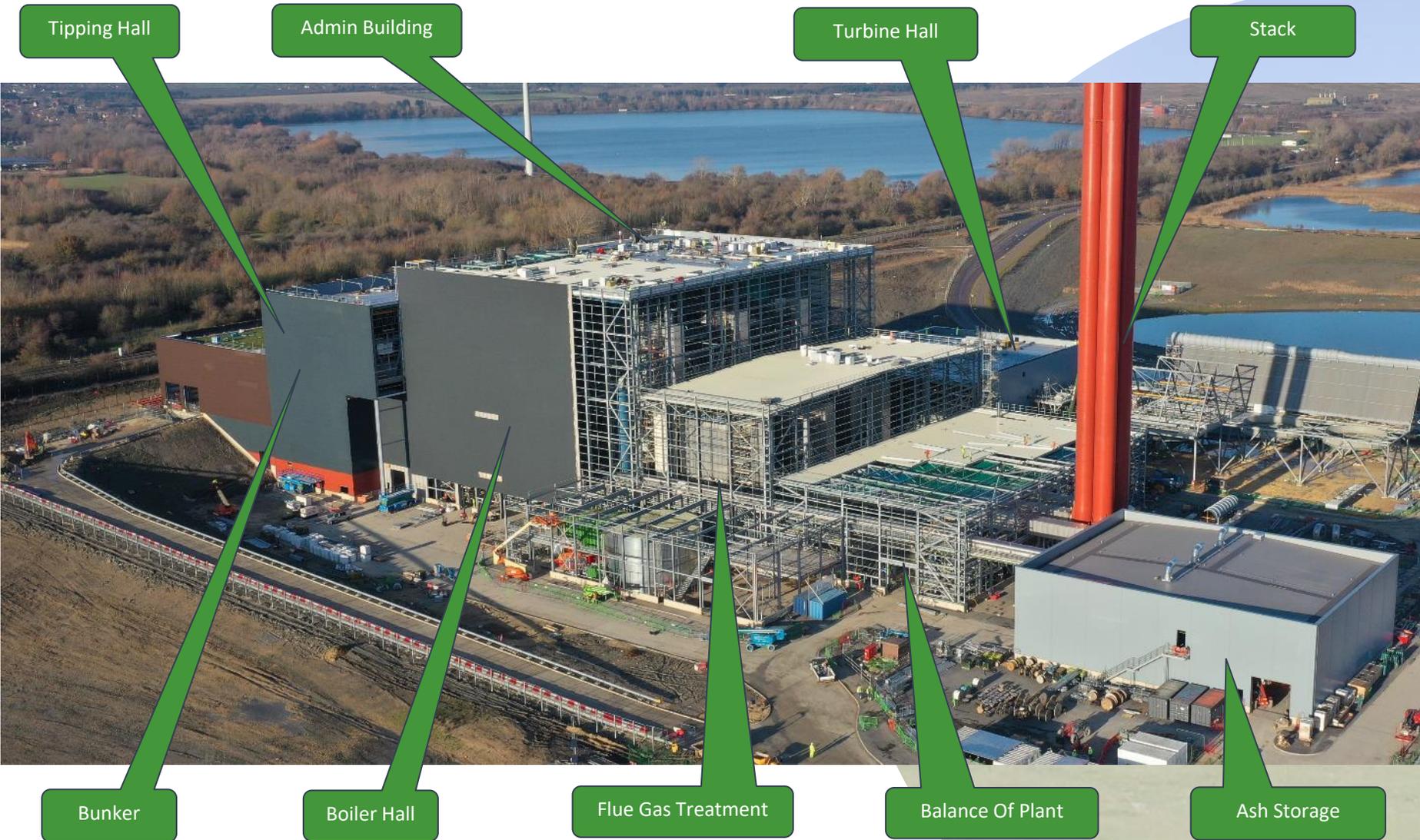
- Construction progressing on schedule
- Extensive Covid-19 control measures continue
- Tower cranes removed
- Building steelwork complete
- Process installation substantially complete
- Cladding installation ongoing
- Tipping Hall, Bunker and Boiler Hall steelwork substantially complete.
- Cladding installation underway
- Green Roof installation underway
- Administration building internal fit out ongoing
- Site workforce currently around 600 persons per day
- Over 2 million person hours worked in total to date



Aerial Photograph – September 2020



Aerial Photograph – December 2020



Off Site Works

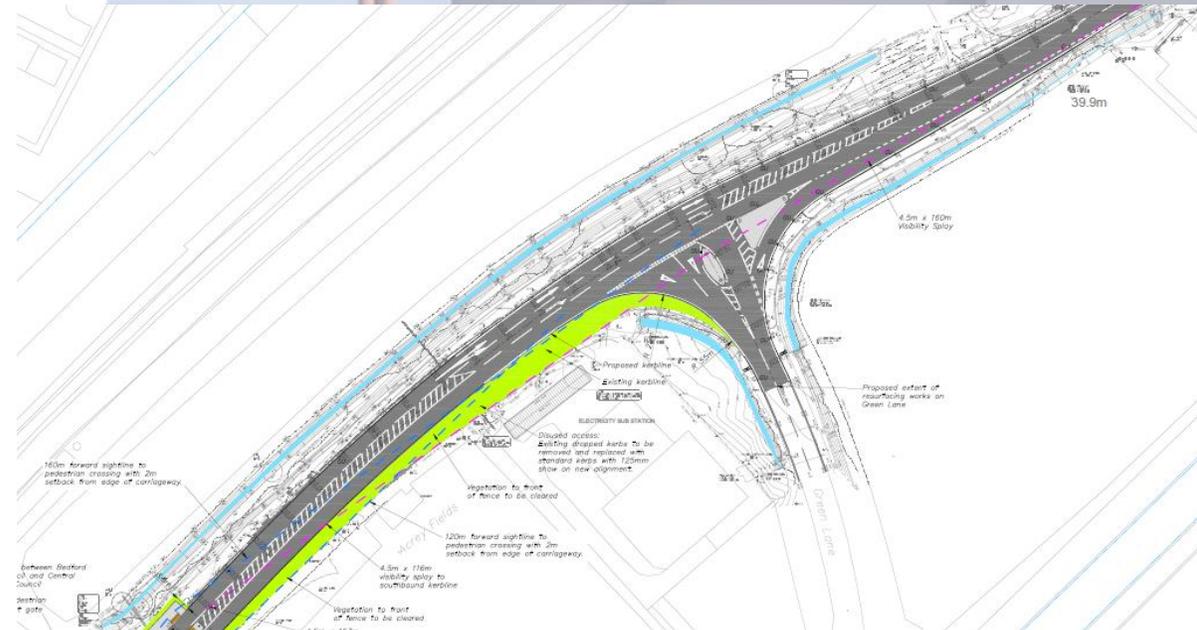
- UKPN HV grid connection works
 - Physical installation works complete.
 - Connection energised on 30th September, providing additional import capacity
- Anglian Water
 - Works in Green Lane complete.
 - Anglian Water works in Stewartby Village approaching completion
 - Water connection expected January 2021
- Network Rail
 - Level crossing upgrade works completed on schedule.
 - “Anti-dazzle” fence to be installed along part of the access road



Rookery South ERF – CLP Meeting January 2021

Off Site Works

- Improvements to visibility at the junction of Green Lane and Bedford Road (C94).
- As required by Condition 37 of the Rookery Development Consent Order.
- Section 278 agreement with Bedford Borough Council.
- Advance notice signs deployed on 16th December
- Works to be undertaken by Hitachi Zosen Inova throughout January.
- Three-way traffic lights in operation between 4th and 31st January
- Weekend road closures with signed diversion routes via A421 and Broadmead Road:
 - 22nd – 24th January
 - 29th – 31st January



Construction – 3 month lookahead

- Quality control and inspection activities on completed works
- Completion of building cladding installation
- Completion of cable pulling and termination
- Completion of installation of electrical equipment, lighting & HVAC
- Cold commissioning activities



Rookery South ERF – CLP Meeting January 2021

Project Programme

Activity	2018	2019	2020	2021	2022
Works Commencement NTP March 2019					
Access Road & Green Lane Junction					
Civil Construction (incl. piling)					
M&E Installation					
Boiler Pressure Testing					
Cold Commissioning (Power on Sept 2020)					
Hot Commissioning (First waste fire May 2021)					
Testing & Full Operation					



Covid-19 Management & Action Plan

- All arrangements are in line with current UK Government guidance and Site Operating Procedures published by the Construction Leadership Council
- UK Government position since the start of the pandemic has been that where suitable measures can be implemented, construction sites in England should remain operational
- The Plan for the Rookery project includes:
 - Transport to site has been re-arranged to ensure that only personnel who are sharing accommodation are travelling together
 - All persons arriving at site are subject to temperature screening and “misting booths”
 - Workforce start, finish and break times are staggered to avoid large groups
 - Additional units have been installed in the welfare area (canteen, locker rooms & offices) to provide extra space and enable social distancing
 - Additional handwashing facilities and sanitiser
 - Additional cleaning / disinfection
 - Skilled staff involved in construction of waste management facilities are exempt from 14 day quarantine for arrivals into UK from overseas

Temporary Extension of Working Hours - Further Applications

- Development Consent Order states “Construction work ... may not take place other than between 0700 and 1900 hours on weekdays and 0700 and 1300 hours on Saturdays... unless otherwise agreed in writing by Central Bedfordshire Council.”
- Permission has been sought to extend the site working hours to mitigate against time lost due to Covid-19 and site productivity issues.
- An application was submitted to Central Bedfordshire Council on 2nd December covering works to the Air-Cooled Condenser.
- **Installation of steel structure and process equipment:**
 - 4th January – 28th February 2021
 - Monday to Friday: 1900 – 2200
 - Saturday: 1300 – 1600
 - No Sunday working
- **Welding:**
 - 4th January – 28th February 2021
 - Monday to Friday 1900 – 0700
 - No weekend working.
- Permission was received from Central Bedfordshire Council on 18th December 2020

Commissioning Phase Activities

- Extensive commissioning and testing phases to verify and optimise the facility operations.
- Three main phases of commissioning & testing:
 - Cold Commissioning
 - Hot Commissioning
 - Operational reliability testing
- Commissioning plan submitted to Environment Agency in December 2020.

Many of the things seen or heard during commissioning are not typical of the normal operation conditions of the facility.



Cold Commissioning: January 2021 to May 2021

- Functional testing of equipment carried out prior to the introduction of consumables (e.g. fluids & gases) and fuel (diesel, waste), for example:
 - Simulated demonstration of safety systems.
 - Testing of electrical systems.
 - Testing of control systems.
 - Flushing of boilers and pipework with water.



Hot Commissioning: April 2021 – December 2021

- Operational testing carried out with the inclusion of consumables (e.g. fluids & gases) and fuel (diesel, waste).
- Initial warming/heating of the facility takes place using fuel oil (diesel) burners – April 2021
- Steam blow – April 2021
- First fire using waste feedstock – May 2021
- Includes verifying plant safety systems such as emergency shut down scenarios.



Steam Blow – April/May 2021

- Introduction of steam for the purposes of cleaning.
- Steam is generated and distributed through the process system to remove debris that accumulates during manufacture, shipping and installation.
- Two periods of steam blowing:
 - Late April 2021 for 5 – 10 days.
 - Late May 2021 for 5 – 10 days.
- Steam blowing can generate noise.
- Steam blowing not permitted overnight as stipulated in the DCO.



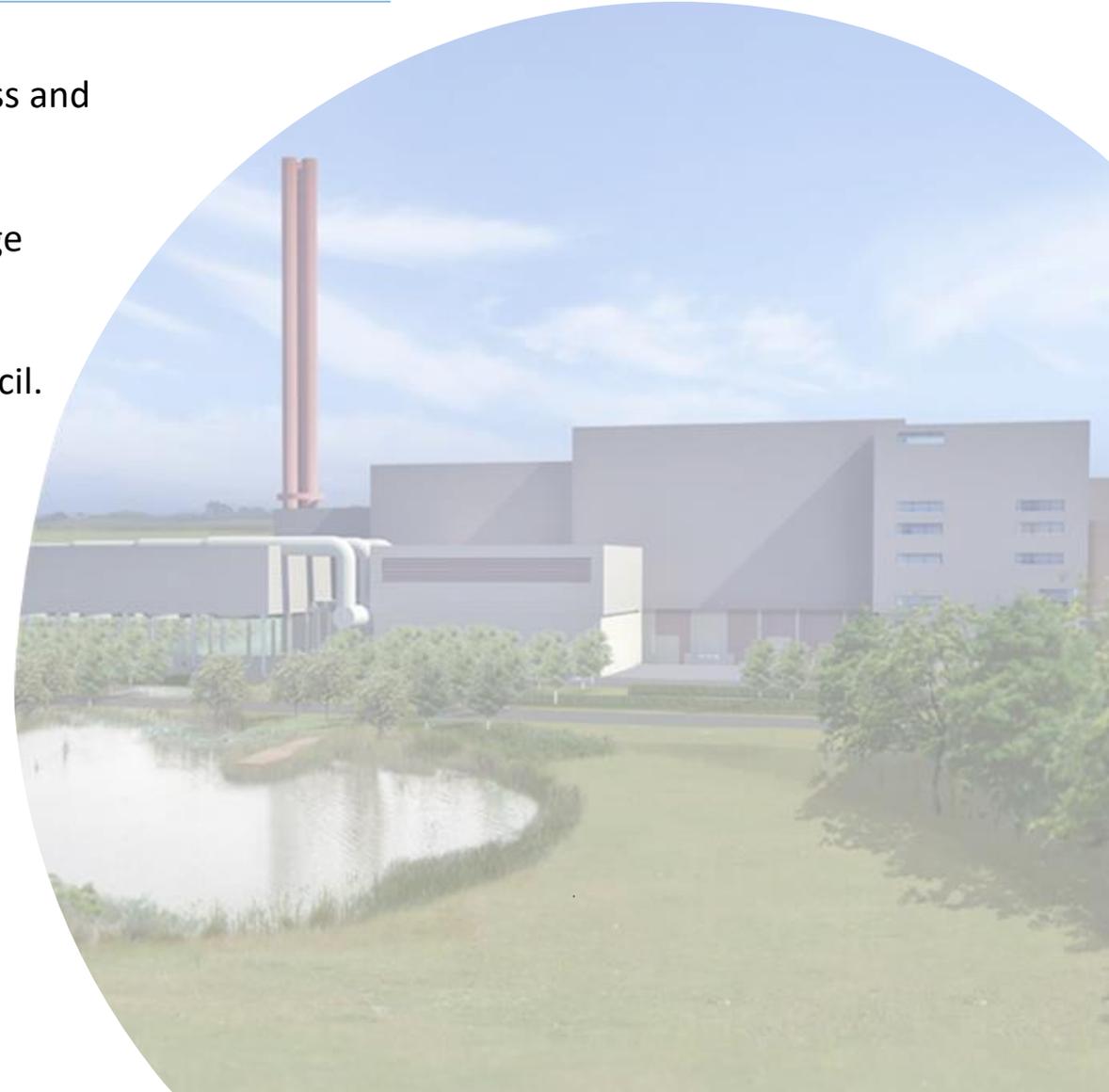
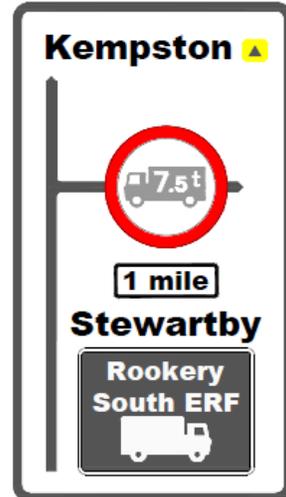
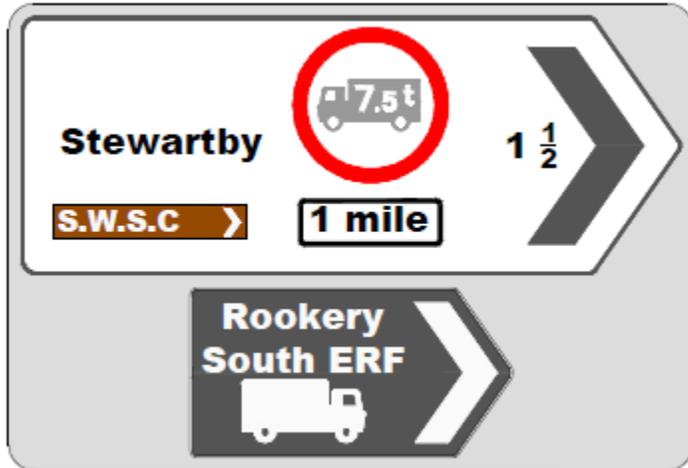
Operational Reliability Testing: December 2021 – March 2022

- Carried out on successful completion of cold & hot commissioning.
- Facility required to run reliably within the normal operating parameters for a pre-determined period of time.
- December 2021 – March 2022
- Following successful completion of the reliability run, the construction, commissioning and testing of Rookery will be complete and the facility can move into commercial operation.



Operational Highway Signage Scheme

- Signage will be installed on the public highway to enforce the HGV Access and Routing Strategy.
- Covanta have engaged an engineering consultant and produced a Signage Strategy document.
- Signage Strategy currently being reviewed by Central Bedfordshire Council.



Operational Readiness

Ian Judd – Facility Manager



Mobilisation Update

Ongoing

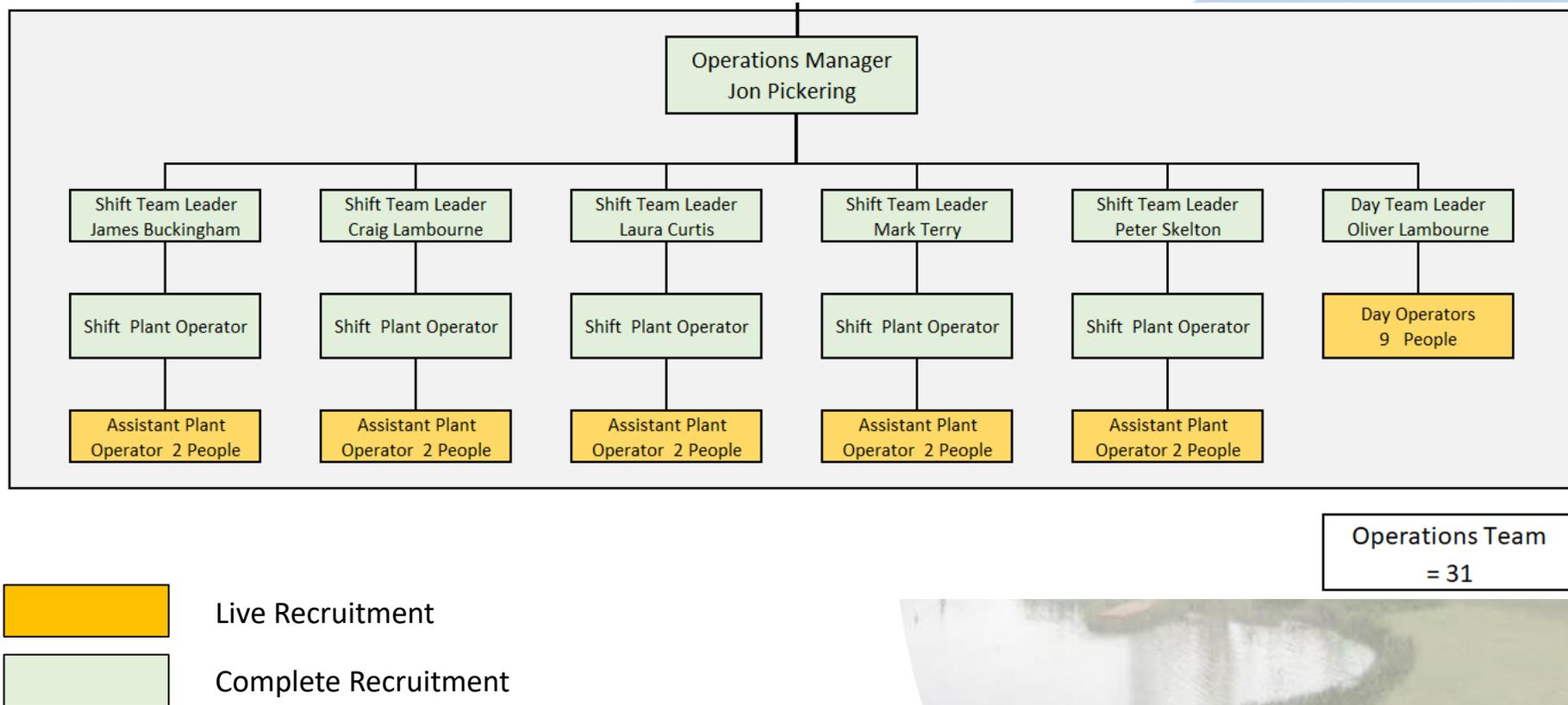
- Final recruitment activities
- Employee on boarding and training
- HZI and Covanta operator training and accreditation
- First waste delivery scoping with Veolia and HZI
- HZI – O&M commissioning interface and support

Look Ahead

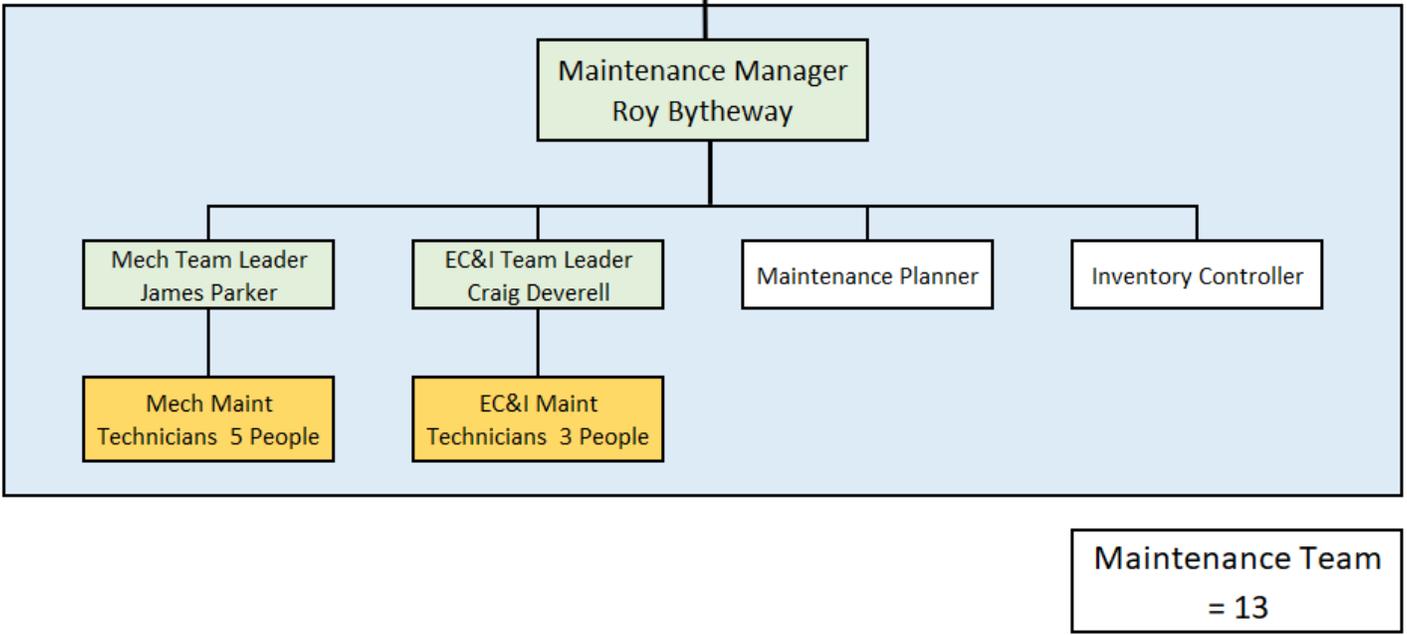
- Engage with UK training providers and service providers
- Continue with the Local Employment Plan commitments
- Development of Operational procedures and risk assessments
- Development of Maintenance Management System and regulatory compliance
- Development of the Environmental Management System and regulatory compliance
- Development of the Health and Safety Management systems and training



Operations Team - Recruitment



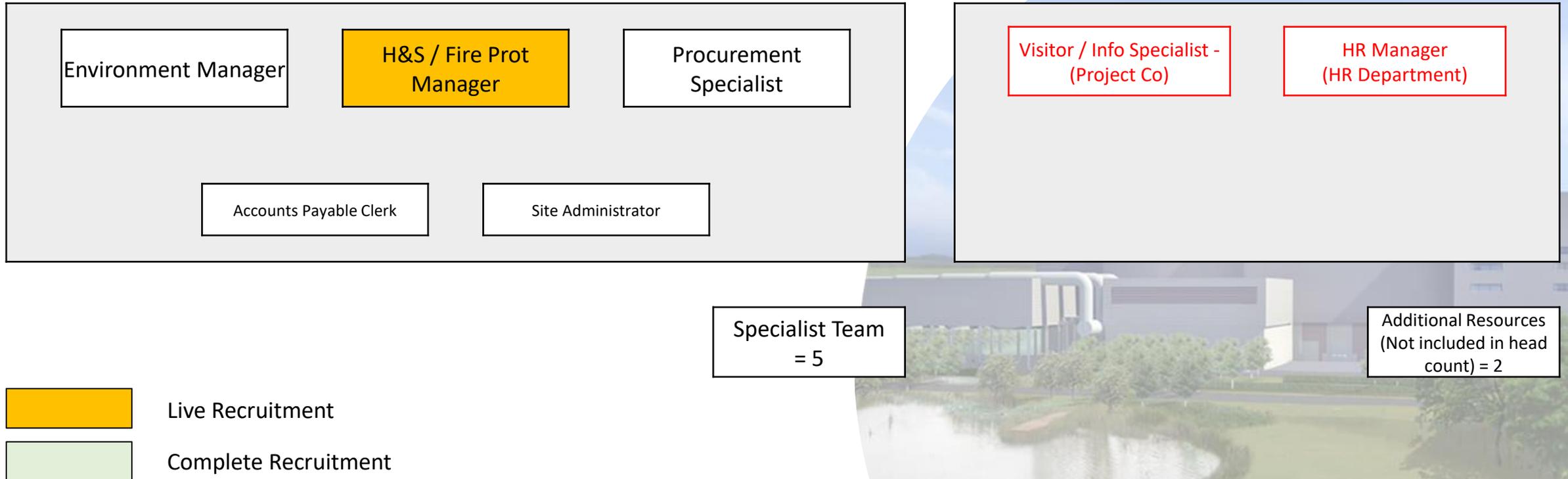
Maintenance Team - Recruitment



-  Live Recruitment
-  Complete Recruitment



Other – Recruitment



Operation & Maintenance: Key Dates and Milestones

Activity	Q1 2021	Q2 2021	Q3 2021	Q4 2021	Q1 2022
Full O&M Team Recruitment					
HZI Training and Ops Accreditation					
Systems and Procedure Development					
First Waste Deliveries					
First Waste Fire (May)					
Workshop and Stores					
Commercial Handover					



Waste Delivery Update

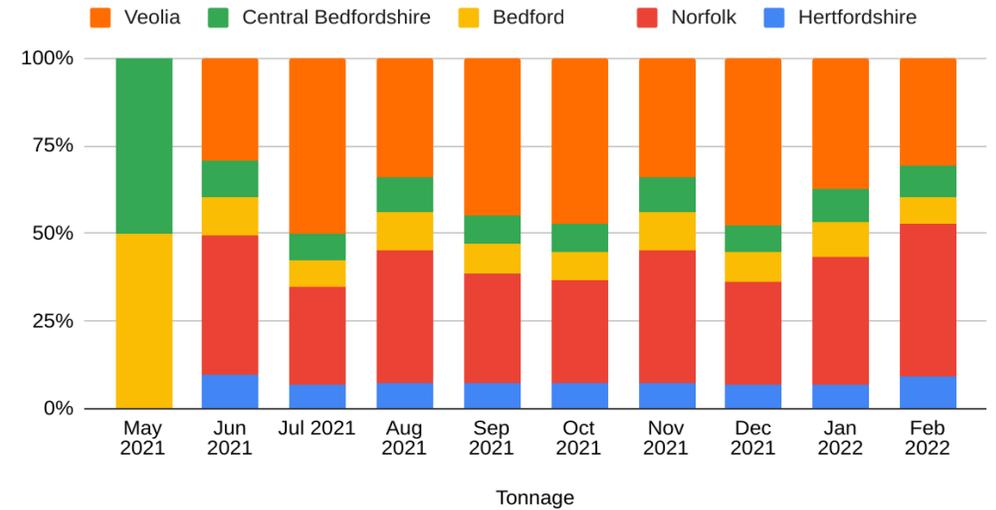
Jacob Hall – Fuel Supply Manager



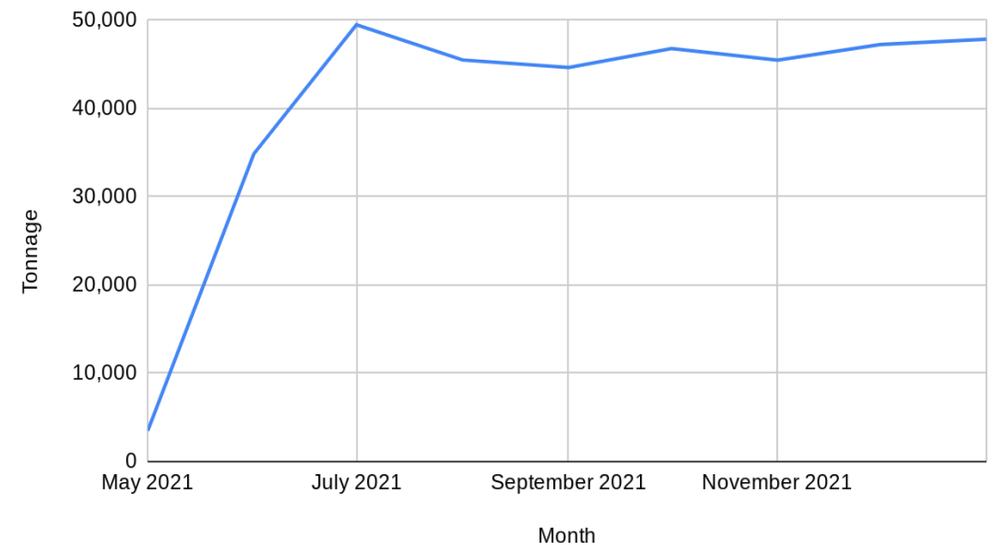
Fuel Requirement during Commissioning

- During Commissioning, Veolia committed to deliver 100% of the waste volumes required
- Commissioning Fuel required from circa mid-May 2021 until February 2022
- Waste requirements fluctuate significantly over the Commissioning period
- Veolia will work closely with Covanta’s Operations team to schedule the deliveries

Rookery delivery %



Commissioning Delivery Profile



Sources of Fuel

Local Authority Volumes

Authority	Volumes (tpa)	Start date
Hertfordshire County Council	Up to 40,000	01/04/2021
Norfolk County Council	180,000	01/04/2021
Bedford Borough Council	49,000	14/11/2020
Central Bedfordshire Council	17,000	01/10/2020
	29,500	01/04/2021
	14,000	01/04/2022
TOTAL	329,500	

Veolia's Commercial volumes

Waste transfer station	Mileage	Volumes (tpa)
Northampton	27	28,000
St Albans	36	41,000
Cambridge	38	28,000
Peterborough	50	11,500
Hinckley	56	35,000
Birmingham	80	23,000
Derby	85	4,500
Norwich	100	21,000
Lincoln	105	23,000
TOTAL		215,000

Waste Transfer Stations Location



Haulage and Vehicles Movements

- Veolia is currently finalising the list of haulage contractors we will be using for deliveries into Rookery. Veolia will be using a large number of our own vehicles
- Material from Bedford and Central Bedfordshire will be direct delivered in refuse collection vehicles (RCVs)
- All other materials will be delivered using larger walking floor trailers
- 25% of vehicle movements will be on RCVs during commissioning
- Hauliers will be issued with delivery routes prior to deliveries and it will form part of inductions for drivers
- All deliveries are equipped with GPS trackers so allows the monitoring of vehicle movements to ensure they follow the correct routing to site



Emissions Overview

Environment Agency



Rookery Pit Liaison Meeting

Name Emma D'avilar

Job title Regulatory Officer

Date 11 January 2021

Points to cover

- Health impacts from the emissions
- Legislation changes and how this affects the permit



EA has a legal duty
to protect human
health and the
environment

We are not Health
experts, we work with
other health and medical
expert bodies to assess
impacts on human
health

We ensure industry
standards and
Legislation Regulations
are met

Sources of pollution

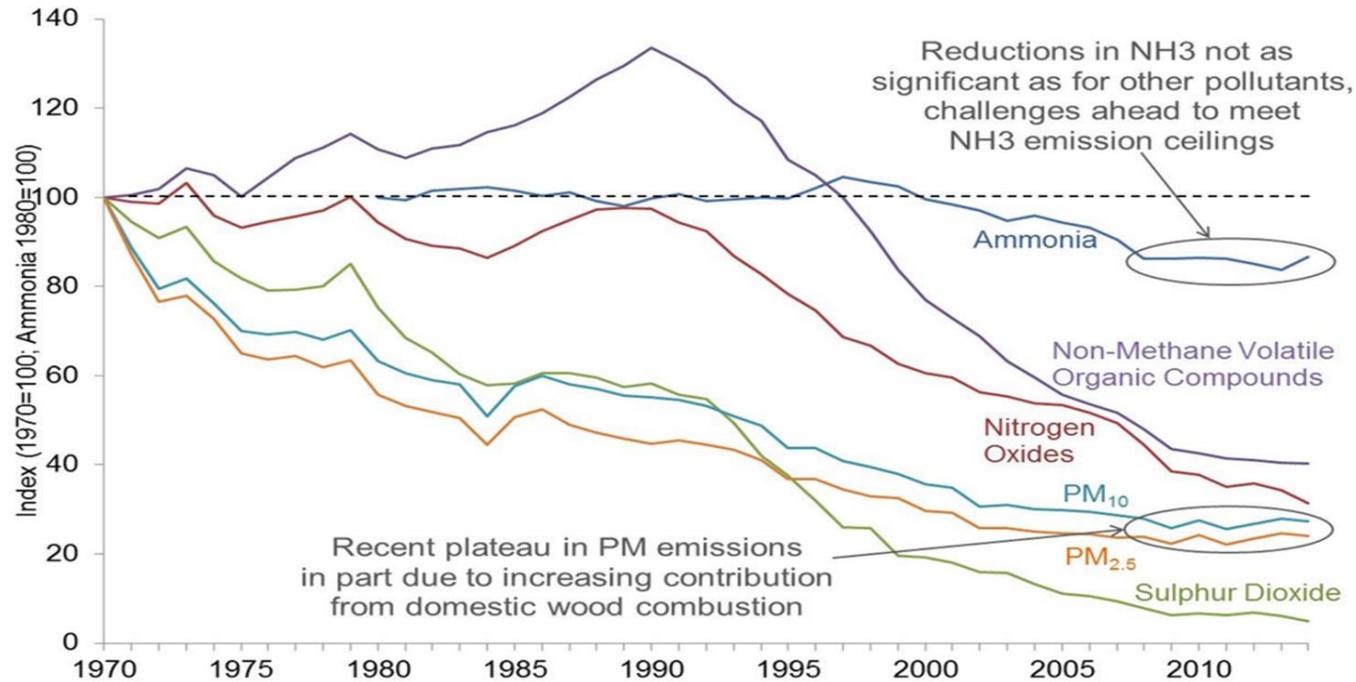


How much
does
industry
contribute
to air
pollution?

**The National Atmospheric
Emissions Inventory
(NAEI) :** Industry makes a
significant contribution to
nitrogen oxides (NO_x),
particulate matter ($\text{PM}_{2.5}$)
& sulphur dioxide (SO_2).



UK national emissions are mostly improving...



- Long-term decline in the emissions of key air pollutants since 1970.
- With the exception of ammonia and PM_{2.5}, emissions of all pollutants continued to decrease in 2015. in 2

Public Health England

- In a recent study PHE have stated :
- “PHE’s risk assessment remains that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small”

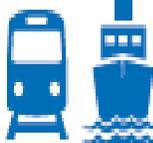
Nitrogen oxides (NO_x) pollution

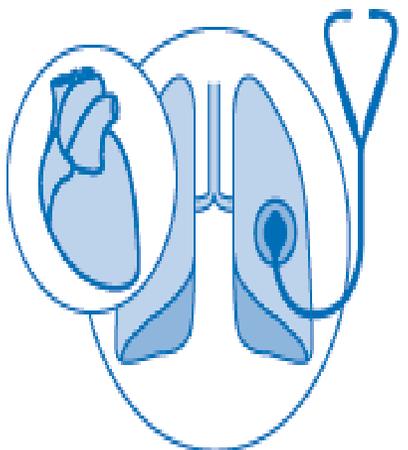
SOURCES

Road transport  34%*

Energy generation  29%*

Domestic & Industrial combustion  25%*

Other transport  10%*



Exacerbates symptoms of those already suffering from lung or heart conditions shortening lives and reducing quality of life



high levels of NO_x can change soil chemistry and affects biodiversity in sensitive habitats

Short-term exposure to high concentrations of NO₂ can cause inflammation of the airways



INCREASES susceptibility:

- respiratory infections
- allergens



*percentage of total SO₂ emissions (2015) source: NAEI 2017

Sulphur dioxide (SO₂)

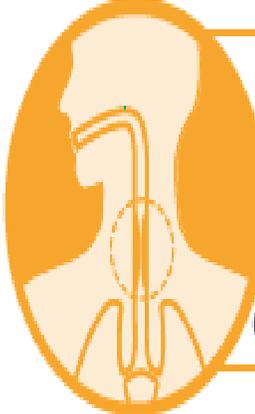
SOURCES

Energy generation  **54%***

Industrial combustion  **21%***

Manufacture & use of domestic solid fuel  **15%***

IMPACTS

 A respiratory irritant that can cause constriction of the airways

People with asthma are particularly sensitive 

 Health effects can occur very rapidly

Contributes to the formation of **ACID RAIN**

 SO₂ pollution damages the environment

this affects biodiversity





Volatile organic compounds (VOCs)

SOURCES

Industrial processes



56%*

Agriculture



12%*

Domestic & industrial combustion



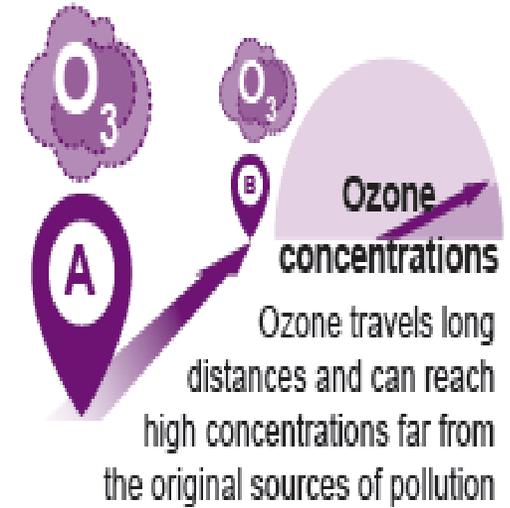
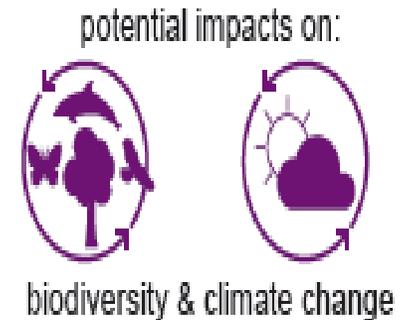
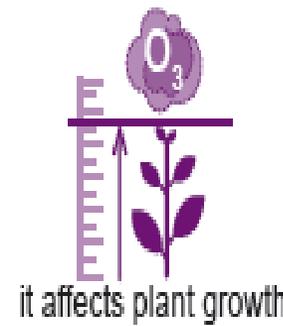
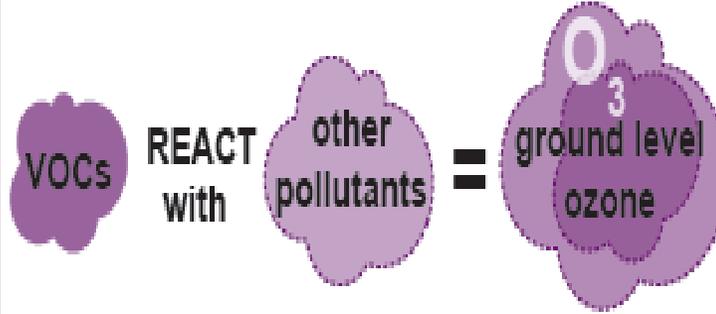
8%*

Transport



5%*

IMPACTS



Particulate Matter (PM_{2.5})

SOURCES

Domestic wood & coal burning



39%*

Industrial combustion



17%*

Road transport



13%*

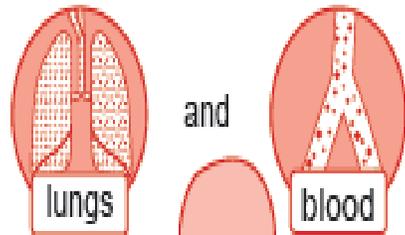
Industrial processes



10%*

IMPACTS

These very small particles from smoke, soot and dust can get into the...

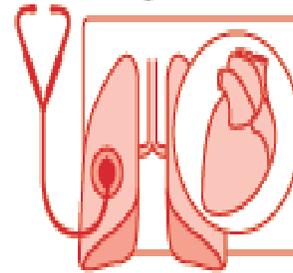


PM can be transported around the body

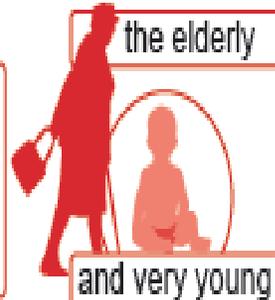
and get lodged in organs



More likely to be affected are:



those already suffering from lung and heart conditions



the elderly

and very young

Emerging evidence shows links between air pollution and:



reduction in children's lung development



low birth weight in babies



cancers & dementia



LIFESPAN

PM_{2.5} can shorten lifespans

Changes in legislation and then the permit

Introducing the mechanisms in which improving standards are Implemented into permits

- BAT and BATc, Best Available Techniques conclusions.
- Regulations 61 Notices.
- Timelines – 4 years from December 2019 for Rookery.
- What they will mean : Reduction in ELVs and possibly additional monitoring.
- Permit reviews results in a new varied permit such as the Covanta, Rookery pit permit.
- EU BAT process will be mirrored in UK BAT process following the EU Exit of the 31 December 2020.

Local Authority Monitoring

Anita Taylor – Planning Authority



Rights of Way Strategy

Judith Harper



Rights of Way Strategy

- Footpaths in and around Rookery comprise permissive and dedicated Rights of Way
 - The DCO extinguished all footpaths within Rookery South
- The DCO enables the footpaths to be automatically reinstated as Rights of Way under the agreed Strategy. Process:
 - the Council is notified that a footpath is reinstated
 - the Council checks and approves the specification
 - the Council adds it to the 'definitive map'.
- The ROMP provides for upgrade of some FPs to Cycleways.
- The DCO does not make any provision for bridleways.
- Covanta has proposed to reinstate FPs to a specification which allows for adequate space alongside to enable access by horses.



Site Visits – Rookery and Other Facilities



Stakeholder and Local Engagement

David Spencer



Stakeholder and Local Engagement Update

Newsletter:

- Early circulation to CLP members
- Increased circulation
- E-editions shared with 14 Town and Parish Councils
- Future hard copy editions of Rookery South News

Other near neighbour communications:

- Project updates for Stewartby Parish Council’s newsletters
- Introduction meetings with Ian Morrish with Stewartby PC, Marston Moreteyne PC and Cllr Tim Hill (date tbc)
- Early notice by HZI of future off-site works (C94/Green Lane and plant commissioning in 2021)



Stakeholder and Local Engagement Update

Recruitment advertising and press release

- First phase November – December
- Local media coverage in each of the target newspapers
- Next phase advertising to shortly commence

Latest film

- August to November film
- See www.rookerysouth/constructionprogress

Festive Donation

- Continued support to Bedford's SMART Prebend Street Centre



COVANTA IS RECRUITING

Covanta, a world leading operator of energy-from-waste facilities, is now recruiting for its operations team at the Rookery South Energy Recovery Facility in Stewartby, Bedfordshire.

The new Energy Recovery Facility will provide a proven and sustainable alternative to landfill, by using residual waste left after recycling and composting efforts, as fuel to generate enough electricity to power over 112,500 homes.

Join us and become a protector of tomorrow. At Covanta, we share a common commitment to the three pillars of sustainability - people, the planet and a shared prosperity. Our culture is one of inclusion, purpose and teamwork, inspiring our dedicated professionals to create a world where no waste is ever wasted.

Covanta is currently recruiting for:

- 5 SHIFT PLANT OPERATORS
- 10 ASSISTANT SHIFT PLANT OPERATORS

To find out more about the Rookery South Energy Recovery Facility and future employment opportunities, please visit: rookerysouth.co.uk

ROOKERY SOUTH
Energy Recovery Facility

COVANTA
Partnering. Growing. Advancing. Sustainably.

Meeting Closure

- Items for next meeting
- Date of next meeting – 12th or 19th April TBC
- Any Other Business



Rookery South CLP Meeting 16 - Notes
Monday 11th Jan 2021 – 6.30 pm
via Zoom

Present

CLP Members – Representatives from Marston Moretaine PC; Brogborough PC; Millbrook PM; Wootton PC; Marston Vale Trust; Lidlington PC; Lidlington Resident; Houghton Conquest PC; Cranfield PC; , BACI; Cllr. Sue Clark (SC)

Observers/Presenters – Covanta/Rookery South Ltd: Judith Harper (JH), Neil Grimstone (NG), David Spencer (DS), Jack Stitt (JS), Ian Judd (IJ), Ian Morrish (IM); Environment Agency: Emma d'Avilar (Ed'A); Neil Goudie (NGd); CBC: Anita Taylor (AT); Veolia – Marine Avisse (MA); Jacob Hall (JaH)

Facilitator: Bob Fisher (rmpfisher77@gmail.com)

Apologies for Absence: Cllr Tim Hill; Roy Romans (CBC); Jon Shortland;

Stewartby PC unable to gain access to the meeting

NOTES FROM THE MEETING

- Participants were reminded of the set of ground rules originally agreed by meeting participants:
 - Keep to time
 - Keep to the agenda
 - Respect each other's views
 - Turn-taking - Do not speak over one another
 - Mobile phones turned off/turned to silent
- In addition, protocols for conducting meetings via Zoom were reiterated:
 - Microphones muted & cameras turned off
 - Raise hand & use Chat mode
 - Permission to record the meeting for notation purposes
 - No recording by attendees, please
- **Approval of notes from meeting 15**

The notes had been circulated in advance of the meeting. No comments re accuracy were raised.

Matters arising from previous meeting (29/09/2020)

BACI rep raised earlier questions about the carbon footprint and whether JS might respond during the Construction Update. BF noted that these questions had been recorded and passed on to Covanta on previous occasions and have been forwarded again this evening.

- **Construction & Traffic Management Update – Jack Stitt (JS)**

Construction update – Jack Stitt (Slides 6-20)

JS summarised the progress on construction since the last meeting in September (see Construction Update slide detailing COVID 19 measures, removal of tower cranes, extensive progress on steelwork, process installation, cladding, Turbine Hall, Bunker and Boiler Hall, roofs – including the green roof – and Admin Building).

In terms of workforce, from a peak of around 900 persons on site per day, this is now around 600 persons and numbers are on a decreasing trend.

Aerial photos from September and December illustrated the progress made in construction over this period.

With regard to off-site works, JS commented on work done on the grid connection on Green Lane, which is now completed, works by Anglia Water – also on Green Lane – and by Network Rail (see slides 9-10) re Off-site Works). JS commented that the facility was now able to import and export electricity when commissioning starts and the turbine is synchronised, later this year.

Currently, the main offsite works which may affect people are improvements to the junction of Green Lane and Bedford Road (C94). These works started on 04/01/2021 and will continue throughout January, with 3-way traffic lights in operation for the duration. Following this work, the junction is expected to be more user-friendly.

JS then outlined the plan for the next 3 months, which prioritises completion of construction (see slide 11-Month Look-ahead), electrical installation – including cable-pulling and lighting – in preparation for cold commissioning.

JS also noted the challenges presented by the COVID-19 pandemic and highlighted the range of measures implemented by Rookery South Ltd (RSL) to comply with current UK government guidelines, which encourage continuing work on construction sites. These measures are outlined on the slide – COVID-19 Management & Action Plan. One addition in the last quarter of 2020 was the installation of misting booths, in which temperatures are taken and then an anti-viral mist is applied to people as they enter the site. JS commented that 1.5 million hours – which represents 75% of the time worked on the project – have been worked during COVID-19 restrictions and very few cases have been reported among the workforce.

JS then went on to cover extension of working hours, as outlined by the Development Consent Order (DCO). (See slide 14). Permission for these extended working hours was granted by CBC on 18/12/2020. These extended hours are necessary due to lost time on one specific piece of equipment which was affected by COVID restrictions – issues relating to the delivery of this equipment from Belgium and also availability of labour. In addition, some welding work will take place overnight; however, this work is not inherently noisy and will take place inside a structure, so no disruption is anticipated. It is hoped that this will be the last of the out-of-hours working which needs to be carried out.

Moving on to Commissioning, JS commented that the plant was soon to enter a number of phases to test the equipment (slide 15).

The commissioning plan was submitted to the EA in December 2020. In particular, JS pointed out that many things seen or heard (e.g. tests, scenarios) during commissioning are not likely to happen during normal operations. He also emphasised that RSL would be sending out a letter drop to the local community, which will go into more detail of what will happen and when in terms of commissioning, and explained the details.

Cold Commissioning is the first phase (see slide 16– Cold Commissioning). This phase prepares the ground for Hot Commissioning, (see slide 17 – Hot Commissioning), which includes the steam blow in April. Further details of the steam blow were given to highlight some of the features of this process. (See slide 18). JS noted that the Planning authorities need to be informed of this with 3 days' notice. and stated that records of steam blowing would be kept.

On successful completion of Cold and Hot Commissioning, the plant will then move into a Reliability Run, which is essentially a trial run to demonstrate that everything is operating as expected. (see slide 19 - Operational Reliability Testing).

JS then went on to note that RSL will be deploying an Operational Signage scheme locally to proactively direct vehicles to the site. He acknowledged that there had been some stray deliveries during construction, so RSL had developed a signage strategy with an engineering consultant, which highlights a series of signs in accordance with approved HGV routes. The scheme is currently under review by CBC (see slide 20 – Operational Highway Signage Scheme) and, once approved, will be implemented.

Q: Lidlington PC asked whether Brexit would affect the project in any way.

JS felt that it might potentially have an effect. The company has been preparing for Brexit for some time, as there are a number of contractors from mainland Europe working on the site. To date, there had been no effects; RSL has managed to get the appropriate paperwork in place and there have been no issues at the borders. There has, however, been an increase in questions at the border, but these are generally answered straightaway.

Q: Wootton PC asked whether emissions data during commissioning will be published.

JS noted that such data is certainly published during the operational phase and will be available via the Covanta website. However, he would need to check and provide an answer to this question following the meeting with regard to commissioning data.

Q: Brogborough PC asked whether the slides for JS's presentation would be circulated to the CLP.

DS confirmed that they would be available between 36 and 48 hours following the meeting.

Q: BACI Rep asked what was the total number of man hours.

JS stated that, at the close of 2020, the total was 2 million hours; toward the end of the year, it had been between 180,000 and 220,000 hours per month.

[There were then a series of questions from BACI Rep relating to cable, concrete, steel, tarmac, fuel, electricity and cladding, which would take some time to address. BF confirmed that he had sent a recent e-mail from BACI listing these same questions to Covanta. Unless someone from the company suggested otherwise, BF felt that these matters would need to be addressed following the meeting. JS and DS agreed that, on receipt of the email, the company can address these issues offline and then respond]. Post Meeting Note: these are the same questions that were raised following the meeting in June 2020. RSL had provided a 'Questions and Answers' sheet responding to these questions which was circulated on 26/09/2020.

[JS then handed over to IJ, Facility Manager]

Operational Readiness

IJ focussed on key areas of mobilisation, including recruitment, training, procurement, environmental management and safety rules. Covanta is currently engaged in final recruitment activities, onboarding and training (see slide #22). IJ noted that there was a very comprehensive HZI/Covanta training programme and accreditation to ensure all operators were competent and credible, in line with industry best practice – and also Covanta's own rules and policies. This period of training will run to the end of the year, in readiness for commercial operations.

Covanta is also scoping out the first waste deliveries with Veolia and HZI to understand how to deal with waste delivered on site, how to get it into the Bunker and deal with any residues (e.g. incinerator bottom ash) – and how to get this off-site. While IJ acknowledged that this can be quite a complex process, there is experience on the team in dealing with first deliveries of waste on a new-build facility. Covanta was also looking at HZI/Operations and Management interface to support and learn from these commissioning activities as these systems and processes are brought online. Following this, IJ also noted future initiatives, including engagement with UK training service providers and local employment plan commitments, as well as Safety and Environmental Management systems and assessments (see slide).

IJ then commented on team roles which had been recruited so far, along with ongoing recruitment (see slide 23– Operations Team – Recruitment for details). He expressed satisfaction with quality and character of the team, especially given the challenging circumstances around the recruitment period. He gave as an example the recruitment of Shift Plant Operator roles who were experienced in working in EFW facilities and who have directly transferable skills, which sets the company up for the future in terms of competencies. IJ explained the difference between Assistant Plant Operators and Shift Plant Operators is that the latter can cover both roles, while the former monitors the plant from outside the Control Room. In addition, IJ noted that Covanta had recruited a very experienced Day Team Leader, who is used to managing large volumes of site traffic, management of the Tipping Hall and IBA.

IJ then commented on the recruitment for the Maintenance Team (see slide 24), noting their experience. Covanta are currently in the process of recruiting Mechanical Maintenance

and EC & I Technicians and IJ noted that it may take some time to recruit sufficiently qualified and experienced people for these roles.

To get through the next 12 months, however, Covanta has appointed an Environmental Consultant – Kirsteen Harrison – to provide support during transition between the different phases in commissioning and operational readiness. Kirsteen is very experienced in EFW and will be active in policing Environmental Permit requirements, as the plant hits Hot Commissioning and, again, IJ considered this to be a very positive appointment.

IJ went on to summarise some key dates and milestones (see slide 26– Key Dates & Milestones).

Q: Marston Moretaine PC asked whether the theoretical dispersal model will be updated with weather data measured at stack top.

IJ did not have the answer to this question to hand and would therefore need to provide a conclusive answer at a later date.

Veolia – Waste Delivery Update – Jacob Hall & Marine Avisse

As mentioned earlier, first waste deliveries will commence in mid-May during the commissioning testing period. (See slide 28 - Fuel Requirement). On top of Local Authority (LA) volumes, Veolia will also be providing any extra material needed for the plant (see Sources of Fuel slide 29 for detail). Veolia will be applying a 'proximity principle', whereby local Waste Transfer Stations (WTS) such as at Northampton or St Albans will be prioritised. The intention of this is to reduce the mileage involved. JaH showed a slide indicating the various Veolia WTS in relation to the RS plant.

JaH noted that deliveries will take place using two types of vehicle – see slide 31. Artics can carry up to 3-4 times the amount of waste compared with RCVs, which therefore requires fewer journeys. JaH expected a low volume of waste deliveries to begin with, in line with the commissioning timeline – around 30-40 starting in May, increasing to approx. 200 in June/July and 200-300 from July to February. JaH stressed that one vehicle movement meant one movement in and another movement out of the site, so at the peak of deliveries, this is expected to be between 100 and 150 waste vehicles per day.

Q: Wootton PC noted that the Veolia catchment area clearly exceeds the 60-mile radius previously quoted and asked whether this fact damaged Veolia's credibility.

JaH felt this was not the case. The majority of the vehicle movements will be within this 60-mile radius. Veolia have included anything above that radius purely to give the company extra security to keep the plant fuelled. He maintained that the company was certainly committed to keeping deliveries as local as possible.

MA added that – if this query related to the Norfolk contract – the key priority for Veolia is to avoid landfilling the waste so, although it may seem quite far away from the facility, it is much more beneficial to bring it to an EFW plant than a landfill.

Q: Cranfield PC asked how long the Council contracts were for; when these run out; and whether it were possible that waste from replacement contracts could be from much further afield, thereby reducing efficiency.

JaH responded by saying that all the Council contracts signed up to were long term (5+ years) and Veolia would not look further afield, but rather maximise deliveries within the local distance and either try to renew these contracts or look within the local area for replacements.

MA added that Veolia can provide tenure of the contracts through the notes and most of these have quite lengthy extensions – any renewal would not be short-term.

Q: Lidlington Resident asked whether there was anything further to note on the Routeing Strategy.

JaH confirmed that Veolia would be working with Covanta on road signs and will also be providing route maps. Before any driver is allowed to deliver to the plant, they will be given a site induction, which will also include a full route plan of how to access the facility correctly.

[At this point SC left the meeting]

Environment Agency – Emissions Overview – Emma d’Avila & Neil Goudie

Ed’A presented an overview covering the potential health impact from emissions and changes to recent legislations and how these affect the permit. She had noted questions on the agenda relating to CO₂ but suggested that these might be picked up at the next meeting. Ed’A first outlined the main role and function of the Environment Agency (EA) (slide 35).

Ed’A then went on to summarise broadly the main sources of pollution – both man-made and naturally occurring. Subsequent slides illustrated the extent to which industry overall contributes to pollution, particularly in terms of NO_x, particulate matter and SO₂. Data were presented which showed an improving picture in terms of UK national emissions since 1990, due in large part to the move away from fossil fuels and coal burning plants. (slides 36-38)

Ed’A noted that the EA is satisfied that Covanta is able to operate Rookery South ERF according to the best available techniques. Pollutants were assessed according to a full air dispersion model at the application stage and the Agency agreed that these pollutants would be screened out to below any environmental standards levels likely to cause any human or environmental receptor to be impacted by the plant. Ed’A added a statement from PHE stating that such wastes incinerators do not present a significant risk to public health (see slide 39 – Public Health England).

Ed’A then commented on the general effects, of certain key pollutants, such as NO_x, for CLP participants to disseminate this information to the communities they represent (see slides 40-43 – NO_x, SO₂, Volatile Compounds & Particulate Matter).

Ed'A then considered if limits on emissions were changed in any way, what the likely impacts might be (see slide 44 – Changes in Legislation). This was essentially an introduction to the mechanisms by which improving emissions standards are implemented into permits the stated aim of continually driving up standards.

There then followed a number of questions from CLP members which reflected general concern over the general coverage of the update.

Q: Wootton PC asked how the EA would react to new PHE advice to cut permitted emissions – with a particular view to emissions near the plant and around Marston Vale.

Ed'A commented that this had already been implemented, as the BAT (Best Available Techniques) reference document (the 'BREF') issued in December 2020 – there is already a cut in emissions; the site would have four years to be able to reduce their emissions to meet these limits. For example, NO_x has been reduced from 200 to 180; dust and particulate matter has already been reduced. She felt that this mechanism was already in play.

Q: Wootton PC asked, having left the EU are we able to move to lower emissions levels and what impact lower emissions levels are likely to have on Covanta.

Ed'A stated that lower emissions levels have already been incorporated within the EU Withdrawal Agreement – [the UK] would mirror and stay aligned to limits set by the European Commission. She envisaged keeping in line with these mechanisms of continuing to lower emissions. With regard to Covanta, Ed'A felt that any new plant with new technology would easily be able to meet these lower emissions levels.

Q: Houghton PC wished to know, with regard to Covid-19, what action the EA were taking to understand how emissions from the plant might exacerbate the health impacts from the current pandemic.

Ed'A reiterated that the EA was not a human health-based organisation; this would be down to PHE or other health authorities.

Q: Lidlington Resident requested clarification from the EA about the likely impact of emissions from the plant on those living nearby.

Ed'A apologised and reiterated that [human health] was not within the EA's competency or expertise, but rather their focus was on environmental concerns.

Q: Cranfield PC commented on the recent inquest into the death of 9-year-old Ella Kissi-Debrah, which was linked officially to exposure to air pollution. In the light of this finding, he wished to know whether these "acceptable" levels of toxins are likely to be reduced.

Ed'A responded by noting that air pollution comes in many different guises. While this was not her area of expertise, she believed that emissions from these plants were continually being driven down.

NGd added that the unfortunate death of this child and the resulting inquest finding has focussed attention. Low-level emissions from car exhausts and lack of dispersion are completely different from those being dispersed from a high-level stack. He added,

however, that the EA is always looking at its policies and working with health professionals to see if the limits remain valid. When these need to be tightened up, the EA tightens them up.

Adding to what Ed'A had said earlier, NGd stated that the permits have been set to limit the impacts from a number of emissions to an acceptable level, but there will always be a very, very small percentage of the population who may be susceptible to these and clearly – under Covid 19 – this proportion has probably gone up. However, a response to any queries on that has to come from health professionals on any symptoms which may appear. He stressed, though, that the permits have been set very conservatively.

BF noted that there were several questions from CLP members [on the Chat] on the theme of how/whether the EA was consulting with health experts, particularly from Houghton PC and Lidlington Resident and asked the EA to confirm whether the competent/relevant authority to address these concerns was PHE.

NGd confirmed that PHE was the competent authority but, with regard to the question about Covid-19, there have been various COBRA meetings at government level, that the EA is represented at this level and there is an exchange of thoughts and ideas on possible impacts. Occasionally, notes are passed down by environmental business colleagues but as yet this has not been highlighted as an issue.

BF asked whether the EA had been consulting with PHE with regard to Covid-19.

NGd felt that there were two aspects to this. First, the EA consults with PHE during the permitting process and - not at a local level – there will also be higher, national-level, discussions about Covid-19 and air quality.

In order to be able to cover the remaining items on the agenda, BF noted that a high volume of questions remained on the serious issue of health impacts from emissions and suggested at this point that CLP participants email these questions and that he would pass these on to NGd and Ed'A for a more detailed response following this meeting.

Local Authority Monitoring – Anita Taylor

AT wished first to clarify something from the recent newsletter. She felt that the interaction between Covanta and the LA regarding the design stage of the plant was not wholly accurate. The newsletter touched on the fact that the LA had had some input into the design of the plant, which was not the case. In written representations relating to the application the LA had made it clear that they had had no input in the evolution of the design and stated that the facility would be 'highly intrusive in the landscape'.

In response, DS felt that the newsletter was referring to the design of the stack and the overall look of the building and that this was part of a consultation with a number of statutory bodies, including BBC and CBC.

AT agreed that that had been part of the consultation, but that the input from the LA had not been conducive to the end design. It therefore seemed as if certain comments about the design had been taken from other organisations and put into the design, but it would not be

fair or accurate to say that the design was supported by the LA. It was clear from all the evidence that was submitted for the DCO process that they had some concerns about the design of the facility and, whilst the justification for this was to reflect the historic industry in the area, the local feeling was that there was not much point relocating a history if local people were not especially concerned about being reminded of this history. AT just wished to make this point because she felt this hadn't been put across in the newsletter.

DS acknowledged this.

In her report, AT noted that since September, the LA had carried out a site visit and a more structured monitoring visit, in which they went through all the requirements in the DCO. That visit took place on 26/11/2020 and did not raise any significant issues. There are still some outstanding issues relating to landscaping and the Rights of Way (ROW) Strategy and some amendments to the Green Lane Visibility and foul water drainage on site. However, the latter are amendments which are required following modifications during the construction phase. The LA has given a number of approvals since the last meeting in September, the first of which was mentioned by JS earlier, relating to the extension of working hours, given on 18/12/2020, for limited and specific operations. AT also noted the Lighting Scheme was approved on 12/11/2020 and this had been with the LA for some time prior to its approval. Both the Local Employment Scheme [Annual Report] and the draft Signage Strategy are currently with the AT at the Council for approval.

Rights of Way (ROW) Strategy (Judith Harper)

JIH briefly covered the current situation regarding ROW. (Slide 47). JH noted that the permissive paths are for local usage and have never been actual rights of way. JIH explained that the ROW Strategy is one of the Section 106 requirements; a draft strategy is part of the planning permission and then the final updated strategy has to be approved by the Council and is going through this process at the moment. The Strategy sets out what RSL will do in terms of setting out footpaths, as shown in the slide 48 – ROW Strategy. In order to reinstate those footpaths, once the Council has been notified, it will go out and check that everything meets the specifications within the ROW Strategy and then the ROW Officers add it to their definitive map and it reverts back to being a right of way.

JH added that the Review of Mineral Permission (ROMP) provides for upgrades of some of the footpaths to cycleways, which is an agreement between the Council and Covanta/RSL and the landowners, O&H Properties. The DCO does not make any provision for bridleways but Covanta has agreed to make the specification to include a wider green verge to allow for adequate space for access by horses. The map shows where these footpaths will be reinstated to bridleways and footways.

Site Visits – RS and other facilities (Jack Stitt)

JS commented briefly that, as soon as it is possible to offer a site visit for CLP members, the company will do so, once Covid-19 restrictions have been removed.

Stakeholder & Local Engagement (David Spencer)

Beginning with the newsletter, DS noted that all CLP members had received early copies of this and he assumed that most had also received hard copies. DS pointed out that circulation for the most recent newsletter had been increased – so far, it has reached 10,566 households, up from 9,995. In addition, following a request at the last CLP meeting, DS had ensured that an E-edition had gone out to around 14 town and parish councils in the Marston Vale area, including Ampthill. There had also been a request at Meeting 15 for a continuation of hard copies of Rookery South News. DS was happy for print editions to continue until the end of the construction phase, whereupon it will revert to an E-edition format.

Other updates included recent contact with neighbours (slide 51)

DS also stated that RSL are keen to work with HZI to ensure that any works which may impact on near neighbours and communities will be communicated in advance.

With regard to the first stage of recruitment advertising outlined by IJ earlier, DS noted that this is now in place and, to support this, adverts have been placed in a number of local newspapers, as well as the Milton Keynes Advertiser. This first phase has been underpinned by a media release and this has been picked up by all the papers carrying the adverts. RSL is also moving to the next phase, which covers roles highlighted earlier by IJ.

DS noted that the August-November film showing progress on the site will be available soon on the RSL website (see slide 52 for weblink).

Finally, DS highlighted the support by RSL for a local charity – the SMART Prebend Street Centre. For the third consecutive year, a donation had been made to this organisation, which looks after some of the most vulnerable people in the Bedford/Bedfordshire area.

Q: Lidlington PC asked whether the CBC email address on the newsletter was correct and pointed out an error on the printed version of the newsletter.

DS undertook to have this corrected on the E-edition asap, within the next 48 hours; the email address should be: mwapplications@centralbedfordshire.gov.org.

BF drew the meeting to a close, noting that one or two participants had had problems joining the meeting (Stewartby PC and Lidlington Resident) and apologised for this.

BF also noted that there were a number of questions relating to the health effects of emissions which CLP members felt had not been adequately addressed and reiterated that these questions [on Zoom Chat] will be sent to the EA to follow up, as these were matters of considerable concern.

Q: Wootton PC asked whether the E-edition of the newsletter would withdraw the mention of CBC approval of the design of the plant (as highlighted earlier by AT).

DS said that he would like to speak to colleagues before providing an answer.

AT offered to forward the relevant pieces of the LA's representations to see the views of BBC and CBC, which were both aligned on this issue.

DS thanked AT for this offer.

Other Business

BF noted that there had been a request from Stephen Sleight, of the Marston Vale Community Rail Partnership to join the CLP. There were no objections to this.

Agenda Items for Meeting 17

BF asked members to email him with any items for the next meeting.

Date of Next Meeting

19th or 26th April 2021 (TBC)

Responses to Questions from the CLP Meeting 16 (11/01/2021)

- 1) *Will Covanta/RSL publish the emissions data from hot commissioning?’*

Answer:

Commissioning will be carried out in accordance with the commissioning plan submitted to the Environment Agency (EA). Reports on emissions and performance will be submitted to the EA in accordance with the Environmental Permit conditions.

The emission performance information may be available once validated by the EA. It is possible that this will be via the CLP meetings.

- 2) *BACI would like their question regarding the Carbon footprint answered.*

Answer:

Rookery South ERF has been developed in line with government policy on waste management and climate change. Effects on the environment were considered as part of the planning and permit deliberations and the facility was granted permission. Questions regarding the effects of this specific EfW facility on the local environment have therefore been addressed; questions regarding the effects on a wider/global scale are a matter for the government and we would respectfully ask that any CLP member wishing to debate this direct their questions to national government either directly or via an appropriate lobbying organisation.

- 3) *Covanta quotes that their pollutant emission levels are a tenth of the legal thresholds permitted; does this include the numerous periods, occasions and procedures when Covanta is allowed to exceed the legal pollutant levels?*

Answer:

Modelling of emissions takes into account exceedances. This is described in the attached extract from the Environmental Permit Application regarding non-routine events.

- 4) *‘Will the theoretical dispersion model [from the planning EIA/permit] be updated with weather data from the stack top?’*

Answer:

Dispersion Modelling was carried out in 2016 for the Environmental Permit Application. It uses data measured from the closest applicable weather stations. Data is measured typically at a height of around 10 m above ground level, and creates a flow field which calculates the conditions at the release height on which the model is built. It was considered by the EA that this was a suitable reflection of the local weather conditions in Marston Vale and an Environmental Permit was issued on this basis. Stack emission monitoring will be undertaken by Covanta as part of the Environmental Permit requirements to ensure that emissions do not exceed those modelled. No additional modelling is required by the EA at this stage and there is no requirement to update the dispersion model.

- 5) *Could Covanta explain the temperature at which emissions will leave the stack and enter the atmosphere and the emissions dispersal pattern when we have weather conditions like the past 24-48 hours: Marston Vale and its environs covered in thick fog all-day, wind speed not exceeding 4mph, temperature ranging from 0-3 degrees Centigrade.*

Answer:

Modelling was undertaken using the Atmospheric Dispersion Modelling System (ADMS4). The emissions modelling and risk assessment for the Environmental Permit considered all aspects associated with local weather conditions including temperature inversion. See below the extract from the Environmental Permit Application 2010 regarding “Potential Effects, Operational Phase - Waste Combustion”.

“8.7.26. As with many applications of this kind, there is a perception held by members of the local community that the most adverse conditions for dispersion are those when a temperature inversion is present, creating a stable layer at the surface. Such conditions are most likely to occur nocturnally, or just before sunset or after sunrise. In this case, the perception is reinforced by local experience of the landfills and brickworks, both of which gave rise to significant odour nuisance. The modelling undertaken here encompasses the full range of meteorological conditions, including the presence of a stable boundary layer for a significant number of hours in a year. Under these conditions, the plume from the EfW stack will be above the shallow surface layer on most occasions and will be prevented from dispersing to the ground by the stably stratified air below.”

(Environmental Permit Application, prepared by Fichtner Consulting Engineers: Environmental Statement Volume I Doc Ref. 3.1, 4 August 2010)

- 6) *‘Will Covanta amend the e-version of their latest Newsletter to remove the claim to support from CBC as requested by CBC?’*

Answer:

Rookery South Ltd has addressed this matter directly with CBC, who are satisfied that their concerns raised at the CLP meeting will be documented in the meeting minutes. The newsletter will not be amended.

- 7) *‘Why has Covanta never acknowledged that methane is collected from the landfill sites in the Marston Vale and does not enter the atmosphere?’*

Answer:

Landfilling has taken place in the Marston Vale since the 1970s. Large levels of methane are released from ‘historic’ landfills but modern containment landfill sites, which includes all operational landfills, capture the methane gas for power generation and for safety reasons. Capture of landfill gas from the Marston Vale sites has been a key part of their operations. Landfill gas is a mix of predominantly methane (CH₄) and Carbon dioxide (CO₂), potent greenhouse gases. CO₂ emissions from landfill do not get burnt but essentially pass through the gas engine to the atmosphere. Further, CO₂ will be created in the combustion of CH₄. Some methane is unable to be captured from very old, degraded waste. However, a comparison between the GHG emissions from landfills with those from EfW is a very complex matter. The consideration of the impact of EfW on climate change compared with landfill is a matter for national government not a local issue.

- 8) *‘What checks will be made on ‘black-bin’ waste from Bedford Borough and Central Bedfordshire Councils brought directly to the incinerator?’*

Answer:

Residual waste delivered direct to the Rookery South ERF from local collections will receive an initial confirmatory check at the weighbridge (with respect to waste type). Random spot checks will be

made of all deliveries to the reception hall prior to being tipped in the bunker. Waste in the bunker will be examined by the crane operator as part of the mixing and feeding duties. Council collection operatives (the bin men) have some responsibilities for checking what goes in the back of their truck, and of course householders also have a duty to place only residual household waste in the black bin in line with guidance issued by the Councils.

Outstanding from Previous Meetings @ 29/06/2020

- 9) *To establish the carbon footprint for the construction of the Rookery South waste incinerator (i.e., the entire facility, including the electricity generation plant), we [BACI] would like to know how much of the following will be used to complete the plant: (BACI)*
- *Concrete (how many tonnes?)*
 - *Steel (how many tonnes?)*
 - *Tarmac (how many tonnes?)*
 - *Fuel (for construction vehicles working on site — how many litres?)*
 - *Electricity (for cranes, lighting etc. — how many kWh?)*
 - *Manpower (person-days for everyone working on site).*

Answer:

See question no. 2 above

- 10) *A CLP member would like information following a recent article in the Guardian which refers to [sic] the huge amount of CO₂ from incinerators and requested a Covanta response to the article and on the likely level of emissions of CO₂ from the Rookery plant. Source: Legal challenge over UK's exclusion of incinerators from emissions target (June 2020 CLP Mtg)*

Follow up prior to January 2021 mtg

- *Was the CO₂ question actually discussed? The member is interested to know, not the legal action being brought in London, but the fact that this type of facility seems to produce a lot of CO₂. Are Covanta/the EA/the Government saying that it doesn't matter how much is produced? Isn't CO₂ a greenhouse gas?*
- **written response via Bob Fisher:** "There was a limited discussion at the meeting re CO₂ and other emissions, which is recorded in the notes on page 10. Covanta provided a response to your query in the 'Questions & Answers' document issued prior to the meeting – although I note your wider interest in it being a greenhouse gas. It was agreed that the Environment Agency would provide a presentation on emissions at the next meeting. The EA will be requested to address CO₂ and its effects within that. There will, of course, also be opportunity to ask further questions during the meeting."

Answer:

CO₂ is a product of combustion. It is accepted that the Rookery South ERF will produce CO₂; the amount will depend on, and vary with, the nature of the waste being burnt. There are a number of research papers on this topic ¹ which suggests EfW produces between 0.7t and 1.7tonnes CO₂ per tonne of waste combusted, of which 68% is likely to be of fossil origin, e.g. plastics. This should be put into context by comparison with electricity produced by burning fossil fuel, and other waste treatment options, as well the quantities of CO₂ emissions produced from other sources eg traffic, industry. Also see response to Q2 above.

¹ https://zerowasteurope.eu/wp-content/uploads/edd/2019/09/ZWE_Policy-briefing_The-impact-of-Waste-to-Energy-incineration-on-Climate.pdf

Questions to the Environment Agency

RSL/Covanta Answer:

Rookery South Limited and Covanta, as the operator, will endeavour to operate the ERF in accordance with the Environmental Permit at all times. It is understood that the EA has the ability to shut down the operation for serious breaches.

The EA also has the ability to amend the Permit to comply with changes to legislation; a reasonable period of time for compliance is normally allowed for existing facilities (which would include any under construction).

Covanta is able to apply for amendments to permit conditions. It is understood that the EA would consult relevant statutory consultees and publish the application in the case of a major amendment.

Rookery South ERF - Community Liaison Panel AGENDA – Monday Jan 11th 2021

- Introductions/Group ground rules (incl. terms of reference)
- Apologies for Absence
- Approval of notes from previous CLP Meeting
- Construction update (Jack Stitt)
- Commissioning Phase Activities (Ian Judd/Jack Stitt)
- Transition to operations (Ian Morrish/Ian Judd)
- Rights of Way Strategy (Judith Harper?)
- Transport and HGV Routing strategy (Jack Stitt)
- Signage
- s.278 works
- Waste Delivery Plan, including vehicle numbers, sources, etc. (Veolia)
- Emissions – including health effects & CO2 (Environment Agency)
- Local Authority Monitoring (Anita Taylor)
- Site Visits
- Stakeholder and local engagement (David Spencer)
- Items for next meeting
- Date of next meeting – 12/19th April TBC



Responses to Questions from the CLP Meeting 16 (11/01/2021)

Questions for the Environment Agency

- 1) *How will the EA react to the new PHE advice to cut permitted emissions? The CLP are interested in emissions in the vicinity of the plant and Marston Vale! (Clive Baker, Wootton PC) [Verbal answer provided]*

“Ed’A commented that this had already been implemented, as the BAT (Best Available Techniques) reference document (the ‘BREF’) issued in December 2020 – there is already a cut in emissions; the site would have four years to be able to reduce their emissions to meet these limits. For example, NOx has been reduced from 200 to 180; dust and particulate matter has already been reduced. She felt that this mechanism was already in play.”

As Emma D’Avilar explained on the evening the permit is a ‘live’ document; reviewed, and varied, as evidence or the law requires. This not only looks at local impact minimisation but also how technological development can be incorporated into existing operations to improve the overall environmental performance of the installation. So where existing health protection advice changes there is, as Emma explained, a mechanism for adoption into the permits. The local compliance and enforcement teams will regulate against the current permit conditions until it is legally or technically changed by the National Permitting Service who interact with EA/Government Policy Teams on these types of issues.

- 2) *Presumably, having left the EU, we are at liberty to move to lower emission levels? What impact on Covanta will lower permitted emission levels have? (Clive Baker, Wootton PC) [Verbal answer provided]*

“Ed’A stated that lower emissions levels have already been incorporated within the EU Withdrawal Agreement – [the UK] would mirror and stay aligned to limits set by the European Commission. She envisaged keeping in line with these mechanisms of continuing to lower emissions. With regard to Covanta, Ed’A felt that any new plant with new technology would easily be able to meet these lower emissions levels.”

The EA is an arm’s length-body of DEFRA, the Government Department responsible for such matters, but the stated position, as Emma D’Avilar explained, is to remain aligned to European Commission Best Available Technique Reference (BREF) guidance for environmental protection from industrial processes. The decision to tighten, or relax, environmental standards is a matter for the UK Government but, in general, there should be no ‘backsliding’ of environmental standards and protection measures and that the principle, as Emma stated, of continual improvement to meet improved emissions standards will be retained.

- 3) If the government decides to reduce the permitted pollutant levels for incinerators, will the Environment Agency change the Environmental Permit for Covanta:-

- a) depending on the wording?
- b) if the incinerator has not yet become fully operational?
- c) if the incinerator is already fully operational?

[Written questions, no answer provided yet]

The Environment Agency will implement UK law as it is changed. We can't comment on specific future legislative requirements, as we aren't the legislator, but where it has not happened the principles, outlined in Question 2, are usually that there is no 'backsliding' of emission limits; there is normally a transitional period to upgrade where it is technically feasible to do so; and that will be dependent on the stage of where any project is at. Normally the law outlines what that means. As Emma explained on the evening the Government has stated that we will mirror the current EU legislation for the time being. Please note that DEFRA are currently consulting on what the future technical requirements for industrial emissions might be:-

https://consult.defra.gov.uk/airquality/industrial_emissions_bat/

- 4) Can the EA itself change an Environmental Permit once issued? If so under what circumstances? If so, would the public be informed or consulted? **[Written questions, no answer provided yet]**

Permit variations are not uncommon. These can be very simple administrative changes, such as a correction of an address or typographical errors. They may be quite simple, requiring very little technical input, and not impacting on the day to day impacts of the site, such as improvement to a monitoring or operational technique. However, some might be quite significant and these fall under either normal or substantial variations. Either of these will undergo a significant technical review by the National Permitting Service (NPS) with statutory consultation required for substantial changes. Putting these legal and operating procedures aside we will inform this forum of any changes that have been requested so that they understand the impact from a change to operations.

- 5) Could Covanta apply for changes to the Environmental Permit? If so under what circumstances would the EA approve the application? If so, would the public be informed or consulted before the application was approved? **[Written questions, no answer provided yet]**

Most changes are applied for by the operator. The approval process is no different from a new application. Therefore some of the documentation provided under the original application would need to be updated and re submitted. The Agency will then review and, only if fully satisfied, will approve a change to the permit.

- 6) Have the EA and PHE and/or other health agencies discussed possible effects of incinerator emissions on Covid patients and/or assessed the susceptibility of people inhaling incinerator emissions to develop Covid?
- If so, what is the outcome of that consultation?
 - If not, does the EA have a duty to consult in this way?

As stated in the meeting policies surround health protection are driven by Public Health England.

At a local level the Environment Agency is engaged at Local Resilience Forums with PHE and at a National Level these will be discussed strategically at various levels of Government, including COBRA.

There has not been any indication, from local or national government, that the current pandemic changes any assumptions on the health impacts from incinerators, or any other industrial or domestic emission sources, and therefore the permit continues to provide the recommended protection necessary to protect human health and environment.

As we said in the meeting we are not health professionals and where an individual is looking for advice and guidance on a medical issue then they should contact a GP in the first instance.

[Written questions, no answer provided yet]

- 7) *If PHE shows concern regarding the impact of Covid, will the EA review the permit - or amend the terms of the permit?*

As stated in Question 6 there has been no indication from PHE that Covid is changing the assumptions that were assessed to determine the original permit. If the law, or statutory guidance, changes then we will review the permit and make the necessary changes.

- 8) *If PHE determine that there is an increased health concern for Covid sufferers and long term Covid effects, will the EA review the granting of the Permit or consider amending the terms of the Permit?*

See Question 7

[Written questions, no answer provided yet]

With regard to Covid-19, what action are the EA taking to understand how emissions from the plant might exacerbate the health impacts from the current pandemic (Paul Rolfe, Houghton PC) **[Verbal answer provided]**

“Ed’A reiterated that the EA was not a human health-based organisation; this would be down to PHE or other health authorities.”

See Question 7

- 9) *What is the impact of emissions from the plant likely to be on those living nearby? (Robina Chatham, Lidlington Resident)* **[Verbal answer provided]**

“Ed’A apologised and reiterated that [human health] was not within the EA’s competency or expertise, but rather their focus was on environmental concerns”

As Emma D’Avilar explained at the meeting the impacts on specific individuals is not something we can comment on, however, the permit conditions are in force to protect both human health and environment from adverse impacts based on the details provided in the Permit Application. The Decision Document for the Permit explains the significant consultation and assessment process that was completed to decide on those protection measures and our involvement going forward will to ensure that these permit requirements are complied with. Should conditions not be complied with we will enforce the permit as dictated by our Enforcement and Civil Sanctions Policy.

- 10) *Since the death of 9 year-old Ella Kissi-Debrah being officially related to exposure to air pollution are your “acceptable” levels of these various toxins likely to change to be lower? (David Sinfield, Cranfield PC)* **[Verbal answer provided]**

“Ed’A responded by noting that air pollution comes in many different guises. While this was not her area of expertise, she believed that emissions from these plants were continually being driven down.

NGd added that the unfortunate death of this child and the resulting inquest finding has focussed attention. Low-level emissions from car exhausts and lack of dispersion are completely different from those being dispersed from a high-level stack. He added, however, that the EA is always looking at its policies and working with health professionals to see if the limits remain valid. When these need to be tightened up, the EA tightens them up”

The answers provided by Emma D’Avilar and Neil Goudie at the meeting are correct. This is a matter for the legislator, however the permit for the facility controls, and monitors, the releases of emissions.

- 11) *Are the EA consulting with medical experts or not? (Bob Fisher, Chairman)* **[Verbal answer provided]**

“NGd confirmed that PHE was the competent authority but, with regard to the question about Covid-19, there have been various COBRA meetings at government level, that the EA is represented at this level and there is an exchange of thoughts and ideas on possible impacts. Occasionally, notes are passed down by environmental business colleagues but as yet this has not been highlighted as an issue.”

See also answer to Question 7 & 8.

- 12) *Did the EA consult with PHE prior to the pandemic? – I would assume the point of regulation is to protect our health. [Written questions, no answer provided yet]*

We consulted the PHE before issuing the permit and the conditions reflect what is required to prevent any adverse impact to human health. There has not been any indication, from local or national PHE Teams, that the current pandemic changes any assumptions on the health impacts from incinerators and therefore the permit continues to provide the protection necessary to protect human health and environment.

- 13) *How does the pandemic change things – should regulation now be stricter? [Written questions, no answer provided yet]*

See Question 12.

- 14) *During their presentation, the EA mentioned that older incinerators are producing more polluted emissions than Covanta will. Could the EA illustrate the difference with comparative, quantitative data including the age and capacity of the plants used to make the comparisons? [Written questions, no answer provided yet]*

As more and more incinerators are built so does the improvement of the abatement technology for cleaner air releases. Although older incinerators may be meeting the emission limit values required by the law, more recently designed and built plant will be able to go beyond these and therefore, by comparison pollute less per tonnage of feedstock. As well as providing quarterly environmental performance compliance reports Operators must provide an annual mass release calculation of releases for our Pollution Inventory reporting database. We will provide a quarterly update on performance, and comparators, when the plant is up and running. Until then we refer you to most recent comprehensive briefing report provided to the UK Parliament on incineration performance.

<http://researchbriefings.files.parliament.uk/documents/CDP-2020-0029/CDP-2020-0029.pdf>