



Public Health
England

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Environmental Health Team
Calderdale District Council

10th September 2020

Dear Environmental Health Team,

Environmental Permit application for Schedule 13 small waste incineration plant ref S13/005 CVSH, Belmont Industrial Estate, Rochdale Road, Sowerby Bridge HX6 3LL

Thank you for forwarding a copy of this application to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England on 17/08/20.

The main emissions of potential concern are point source emissions to air of products of combustion (primarily oxides of nitrogen and other substances including particulate matter, oxides of sulphur, carbon monoxide, volatile organic compounds, metals and dioxins and furans).

Public Health England (PHE) has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health (<https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health>). PHE's risk assessment is 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. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.

For this specific small waste incineration plant (SWIP), the application includes a planning appeal decision, in which the Planning Inspectorate reviewed previous air quality impacts assessments in detail – including concerns raised by respondents regarding dispersion models and inversion conditions – and concluded potential impacts on air quality were not significant. PHE had responded to the original planning consultation in May 2017 and noted that the process would subsequently be subject to an environmental permit specifying emission limits and monitoring requirements.

The applicant has updated their 2017 air quality impact assessments using more recent baseline pollutant and meteorological information and high-resolution terrain data. The updated assessment uses a conservative approach (eg, operation at emission limits for most substances and worst-case meteorological datasets, with consideration of the implications of using weather data from an

alternative nearby location) and predicted no exceedances of short or long-term air quality standards or significant effects on nearby Air Quality Management Areas for nitrogen dioxide.

- The applicant's assessment of emissions to air does not include screening of impacts associated with deposition of metals or dioxins. The Environment Agency website sets out [screening criteria for metals](#) typically used for larger installations subject to Part A1 permits. Whilst deposition from small waste incineration plants operating within emission limits seems unlikely to be significant, the local authority may wish to confirm this with the applicant
- Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation
- The applicant's air quality assessments indicate that if the installation is operating within emission limits it is unlikely to lead to significant impacts on air quality. PHE notes that the planning decision required a condition for the establishment of a liaison group before the first operation of the site to help mitigate concerns expressed by local residents. PHE suggests that the results of continuous and bi-annual emissions monitoring are periodically reviewed at these meetings, together with any other issues

This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.

Yours sincerely,



Jim Stewart-Evans
Principal Environmental Public Health Scientist