

The Registrar
SEPA
Strathearn House
Broxden Business Park
Perth
PH1 1RX

Andy Hamilton
Abernethy
Perth

2nd May 2009

Dear Sir,

I am aware that SITA have applied for a PPC licence for the proposed Binn Farm incinerator.

My primary concern is dioxins. Dioxins are the deadliest man-made chemicals and are generated whenever plastic is burnt at a temperature lower than 800 degrees Celsius. Because of inadequate facilities for recycling of *all* different types of plastic, domestic waste comprises a high proportion of plastic.

It has been suggested that monitoring of dioxin emissions from the proposed incinerator at Binn Farm would be conducted at 6 monthly intervals. This does not satisfy your duty of care to nearby residents. As I understand it, the operators of the proposed incinerator would be a private company; eventually all private companies are tempted to cut corners for profit. One such corner might be to operate the incinerator at a lower temperature. As soon as one emission inspection had been carried out, the operator would be able to pollute with immunity for the next 5 months. Just one breach of regulations, in adverse weather conditions, would be sufficient to kill people. With this in mind, it might be advisable for SEPA to examine the catalogue of incidents, not only at Binn Farm landfill site, where SEPA has confirmed breaches of operating conditions.

I request that SEPA should insist on the provision of 24*7 incinerator temperature information. With modern technology, this would not be difficult.

I have two other, subsidiary concerns.

1) Carbon footprint. One ton of Carbon dioxide would be produced for each ton of waste incinerated (an EFW incinerator would produce 30% more Carbon dioxide than even a gas-fuelled power station). In addition, due to the centralisation of waste disposal for Tayside/Perthshire/Grampian there would be considerable carbon emission from all the road transport of waste.

2) Incineration quota. I understand that the Scottish Government has set a limit, at a regional level, for no more than 25% of domestic waste to be incinerated. The DERL incinerator already consumes that proportion.

Despite over 800 objections from the communities surrounding Binn Farm, PKC granted the planning application for the proposed incinerator. PKC also have a duty of care to local residents, but one senses that they are not really equipped to assess matters of this complexity. I trust that SEPA will handle the matter of the PPC licence more intelligently.

Yours sincerely,

Andy Hamilton

