

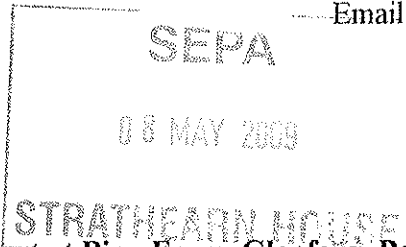
# Abernethy and District Community Council

The Registrar,  
SCOTTISH ENVIRONMENTAL  
PROTECTION AGENCY,  
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Abernethy  
Perthshire

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6<sup>th</sup> May 2009



Dear Sir

**SITA Energy From Waste Plant at Binn Farm, Glenfarg, Perth.**

I write on behalf of Abernethy & District Community Council to lodge with you its **objection** to the IPPC application by SITA and urge you to reject the application.

Given the technical complexity of this application the committee feel much of the present application is out with its capability to consider in any detail. None the less the committee thank you for the opportunity to comment.

Clarification is required regarding the title page of SITA's main report. Is this application for an EfW plant and a MRF or a Resource Recovery Park at Binn Farm.

Perth & Kinross Councils low regard at the planning stage to, capacity, number of facilities and locations in the area as well as partnerships that will be required to develop plants for thermal treatment of waste, resulted in the granting of approval of SITA's planning application for an EfW plant at Binn to treat MSW collected in the P&K area.

SITA's application does not comply with the published Area Waste plan (Tayside), it is based on a flawed Best Practical Environmental Option (BPEO), a Strategic Outline Case (SOC), which did not take into consideration the whole of the Tayside area, disregarding the proximity principal. Justifiable need is not demonstrated, with little to no consideration given to other sites, particularly those already with planning approval (Shore Road Perth and DERL in Dundee).

Scottish Government now inform that there will be a capping of 25% of waste to EfW plants per region. Perth & Kinross appears to have adopted a 'Burn' policy resulting in an over provision of EfW capacity proposed within the Tayside Area. This is not BPEO for Tayside nor is it a sustainable waste management programme. If compliance with National Waste policy is to be achieved these fundamental failings require addressing now. It will be too late once these plants are up and running over scaled and in the wrong locations.

## **Energy Efficiency**

The location of this facility does not lend itself to maximum efficient capture and practical use of the energy produced.

SITA inform that while electricity connections to the grid may be achievable there are significant impracticalities to heat supply out with the immediate site area i.e. to local developments at Bridge of Earn.

Although SITA suggests alternate uses no indication is given to their accord with Area and National Waste Plans or compliance with Planning legislation and while SITA indicates discussions with various possible partners for some of the suggested proposals have taken place no positive verification is provided.

These proposals appear more speculative rather than definitive with no positive input for an effective power heat plan provided, making the proposal an extremely inefficient method of producing electricity while producing emissions, residues and vast amounts of CO2.

**Pre – sorting of Waste**

Only truly residual waste should be 'thermally treated'.

In the interest of preventing risk to the environment and human health SITA require to indicated how segregation of non-renewable and non-combustible materials will be maximised prior to thermal treatment of the residual waste and provide facilities for identifying and removing unacceptable waste.

**Emissions and Residues**

Chemical and particle emissions - Health concerns from chemical and particle emissions (and the cumulative effects from other waste operations in the Binn area) still exist with in the community.

As Incinerator emissions are 'controlled' not stopped or eradicated, six monthly intervals of monitoring are felt to be inadequate. Continuous monitoring of Hydrogen Chloride, Chlorine, Cadmium, Thallium, Mercury, Antimony, lead, arsenic, Chromium, Cobalt, Copper, Manganese, Nickel, Vanadium, Dioxins, Furans, Carbon Dioxide, Asbestos etc. should be implemented and this information could be made available to the local community for reassurance that the plant is operating within 'permitted parameters'.

Bottom Ash – the application provisions for this ash are inadequate. (landfilled or recycled as aggregate). Due to the toxicity of this ash what provisions are in place to age this ash prior to use as a possible aggregate. Has an actual demand for this product been established. Has a transport assessment been carried out and planning permission secured to cover this process.

Fly Ash – The dumping of toxic waste outside of the region is controversial at the national level and is opposed by groups who are opposed to the dumping of this toxic material in their locality. A safe and unflinching method of disposal must be assured.

Odour – Even with the provision of odour extraction and abatement, it is likely that due to the nature of the materials handled at the EFW plant there may be from time to time incidents of offensive odour in the neighbourhood. Given the history of odour complaints arising from current operations in the Binn Area are SEPA sufficiently confident that they will be in a position to identify which process in emanating the emissions to take the appropriate enforcement action. Licensing and planning conditions are of no use unless they can be successfully enforced.

Noise – There are concerns in relation to noise nuisance arising from the process and cooling of the turbine exhaust steam. Can this concern please be given due consideration.

For the reason given above we feel SEPA should reject this application

Yours faithfully



For and on behalf of Abernethy & District CC



Secretary