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Date: 13<sup>th</sup> August 2021

Dear Permitting Support,

**Environmental Permit application for** Portland Energy Recovery Facility, Incline Road, DT5 1DB  
**Application Reference:** EPR/AP3304SZ/A001 (CIRIS 57565)

Thank you for forwarding a copy of this application to the Centre for Radiation, Chemical and Environmental Hazards (CRCE) at Public Health England on 11/06/2021.

We have provided comments (21<sup>st</sup> December 2020) to the planning application for this installation, in relation to activities for the development of an advanced energy recovery facility (ERF) with ancillary buildings and works.

The main emissions of potential concern are point source emissions to air from the energy recovery facility.

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.

#### **Recommendations:**

We request that the Environment Agency takes account of the following concerns when considering appropriate permit conditions:

- that the air quality modelling used is suitable and accurately reflects the local topography and provides reliable estimates of reasonable worst-case ground level pollutants
- that an assessment against the tolerable daily intake (TDI) of dioxins, furans and other considered metals for the oral pathway at the worst-case receptors is conducted

- a full Construction Environmental Management Plan (CEMP) is submitted prior to development detailing environmental management measures ensuring these are appropriate and address potential risk to human health
- that a Pre-Operational Condition is included within the EP which requires the details of the proposed NOx abatement system to be confirmed during detailed design
- that additional gas monitoring is required as the proposal to redevelop the site progresses
- when transport and commercial activity return to more business as usual a noise survey is conducted, with the results being used as a basis for confirming noise emission limits and designing the ERF accordingly
- further ground investigation across the site, adhering to appropriate standards, to fully assess the potential for contamination which could impact the proposed redevelopment of the site and the potential associated health impacts

The applicant has used the COMEAP methodology which is not generally recommended for modelling the human health impacts of individual installations. However, it may have limited applicability where emissions of NOx, SO2 and particulates cannot be screened out as insignificant in the Environmental Impact Assessment, there are high ambient background levels of these pollutants, and that its use was appropriate.

The recommended approach is therefore the use of the methodology set out in the guidance for comparison for most pollutants (including metals) and dioxin intake model using the HHRAP model for dioxins, furans and dioxin like PCBs. PHE would recommend that this model is used in this instance.

Any information arising from these recommendations should be sent to Public Health England for consideration when it becomes available. Such information could affect the comments made in this response.

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,

Emily Cheek

Environmental Public Health Scientist