

Press release. Incinerator Bottom Ash Risk health risks, Residents group seeks answers.

Incinerator Bottom Ash Risk health risks, Residents group seeks urgent answers – Press release.

As a local site (Johnsons Aggregates Recycling Ltd @ Whittlesey Town, CCC/24/091/VAR) seeks to almost double its processing of Incinerator Bottom Ash a resident's group is pressing the Environment Agency (EA) and Cambridgeshire County Council (CCC) for answers over what they believe are glaring gaps and discrepancies in the planning and regulatory process. Saxongate Residents group say they need answers to these key questions to restore public confidence (there have been over 600 recorded complaints in the last 2 years). Saxongate believes the issue may have national and not just local significance, as the use and possible misuse of Incinerator Bottom Ash Aggregates become more widespread. This seems worthy of reporting on. Millions of tons of Incinerator Bottom Ash Aggregate are due to be used around the UK in building projects. .

Questions put to the EA: -

1. Does the EA consider IBA and or IBAA to be inert? The current permit refers to non-hazardous and inert waste appropriate measures. But IBA and IBAA can emit hydrogen gas and are a known chemical leachate risk. Can such materials be considered inert? Could the use of this term lead to operators and councils specifying and handling the materials to misunderstand and minimise the risks of environmental pollution from misuse (noting we have a major ongoing example of misuse locally a Churchfield Farm). Saxongate has seen operators, agents and councils call IBAA inert.
2. The EA has been clear that they consider IBA(A) as waste. But reading your RPS247 (862 words), the word waste only appears four times and it does not implicitly state that IBA(A) material is a waste. Is this leading to operators and councils specifying and handling the materials to misunderstand and minimise the risks of environmental pollution from misuse? Should the RPS include an unambiguous statement that IBA(A) is a waste? In addition, if there is a strong wish to better inform operators etc on this topic, would it also be sensible to also include a link to the five-page EA FAQ sheet produced last year for IBA(A) on the RPS247 webpage. We again note that we have a major ongoing example of misuse locally at Churchfield Farm, which is being investigated by the EA.
3. Regarding the new planning application from Johnsons Aggregates Recycling Ltd to increase IBA(A) processing at Saxon Pit, residents are very concerned that PM10 dust is being screened out of the Health Impact Assessment as the predicted Defra background at $16.29\mu\text{g m}^{-3}$ is less than $17\mu\text{g m}^{-3}$ (as listed in the air quality report). This is treating IBA(A) dust like.....well dust, but IBA(A) comes from an incinerator and is at times in quarantine pending confirmation it is not hazardous (but it is always toxic). We were under the impression that Johnsons was a sealed site and no dust or water would leave the perimeter. We believe that IBA(A) is a variable toxic soup of chemicals and do not think any level is safe to be breathed in or ingested by local residents, young school children or livestock. We also note many people living around the pit are in vulnerable health groups. The Johnsons application does not seem to acknowledge the toxic, variable chemical nature of IBA(A), it is not the same as virgin mined quarry material, but that is how the Air Quality report and Health Impact Assessment (copies available) appear to be treating it. Is this a correct assessment or is the application flawed in its assumption and screening out the dust risk. We note they also do not use the dust figures from the x2 Mcert monitors on site to validate any of the theoretical conclusions with real world, measured data to evidence their ability to avoid dust from the current operations.
4. As we read it the new planning application states that dust will be emitted from the site. Does the EA therefore consider there are safe levels for public exposure to these materials and if they do, what level of dust emissions / local contamination are considered to be acceptable without

generating a health risk? We also again note that at times (pending test results) IBA piles at Johnsons have the potential to be declared hazardous (as we understand the testing process developed by the industry trade bodies). Of course the piles always remain Toxic.

5. If from point 4 above an amount of dust emission is to be accepted by the EA what will prevent accumulation in the local environment over the lifetime of these operations. As we understand it, IBA(A) is a varied mix of many chemicals, some of which are said to be significantly harmful to health and can be very persistent / accumulate in the environment. Residents are keen to know what monitoring and testing will be in place to provide reassurance that this installation is not creating a long-term risk to their health and the environment.

Questions put to CCC: -

From various meetings and emails Saxongate Residents understand that Cambridgeshire County Council still class and treat Incinerator Bottom Ash Aggregate (IBAA) as a product and do not classify it as a waste material. Is our understanding of the current situation accurate and fully, correct?

Assuming our understanding is correct we would like to know who in the council is responsible for that assessment and who is the subject matter expert advising them on that point?

We note that the Environment Agency who regulate IBAA and issue the permits for its use do classify and treat it as a waste product. They are also clear that mixing IBAA with non-waste or virgin aggregate makes the whole new mixture a waste.

We also understand that under a service agreement Fenland District Council Environmental Health acts as a subject matter expert to Cambridgeshire County Council on health and environmental issues relating to IBAA. They also classify and treat IBAA as a waste product. In addition, in May this year, Fenland District Full Council voted almost unanimously to send out guidance confirming their stance that IBAA is a waste product to various organisations, including Cambridgeshire County Council. This followed proven cases of IBAA waste from Johnsons Aggregates Recycling Ltd, Saxon Pit being misused in the Whittlesey area, creating an ongoing potential risk to health and the environment.

We specifically ask what guidance and technical information Cambridgeshire County Council is using to justify ignoring the two subject matter expert opinions listed above, hence asking who is responsible for this stance and what qualifies them to set that policy against the advice of the Environment Agency and Fenland District Council Environmental Health.

This is a pressing matter for us to understand in more detail in relation to the Johnsons Aggregates Recycling Ltd planning application, so we can better frame how IBAA is being viewed by Cambridgeshire County Council.

As part of the current planning and permit process automated dust monitoring has been in place since the site's inception, recording the levels of dust the site is generating against approved targets 24/7. We have been unable to get any data from 2023 and likewise nothing for this year (we have an overdue FOI). The newer odour and dust plans we have seen look very much like the old ones, so it is hard to see how their performance in relation to dust and odour would improve if almost double the activity is allowed on the site, given also that residents have complained about dust and odour well almost identical plans have been operational. It seems the applicant is allowed to keep using theoretical desktop modelling and assumptions to show there will be no issues, while the actual measured results for dust from the site over a 22-month period is being excluded and or suppressed. This seems unfair to us as it may indicate that the dust issue has not been managed effectively, we know there were big exceedances in 2022. Is there any way for officers to ask for actual dust measurements to be included/provided, given they know that they are available from the site as part of the EA permit and planning permission?

End of press release.