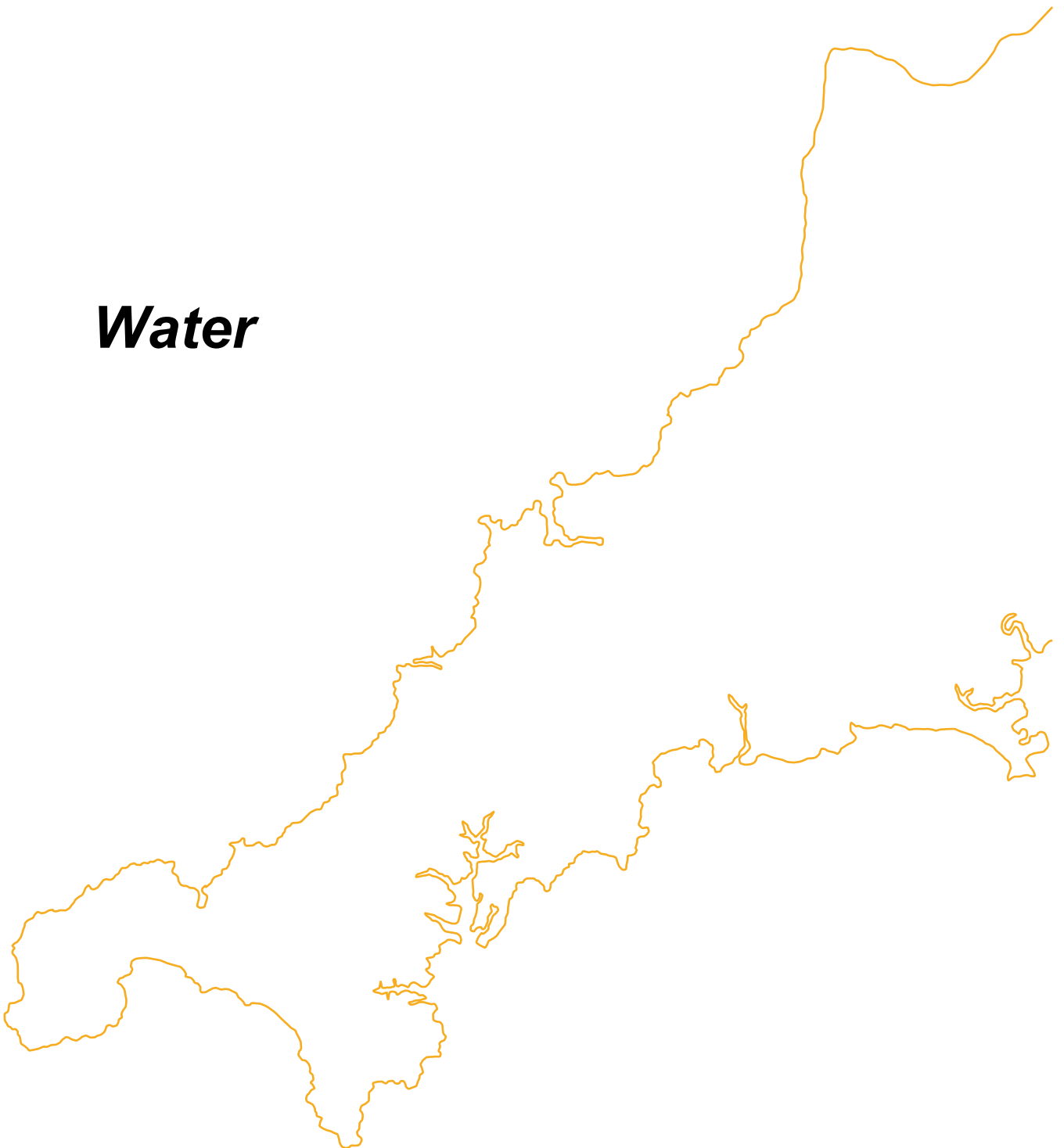




# Consultee Response to CERC Environmental Permit Application

**Consultee**  
St.Dennis Anti Incinerator Group (S.T.I.G.)

***Water***



**Water**

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## Water

# KEY FAILURES

SITA's application to the Environment Agency for a permit to operate a mass burn incinerator is fundamentally flawed and therefore a permit should not be issued.

The key failure areas of the application within this section are:

- How 33,000,000 gallons per annum will be sourced.
- Security of supply.
- Adequacy of supply.
- Adequacy of water supply infrastructure.
- Effects of major works necessary to augment water supply infrastructure.
- Costs liability and water supply/maintenance.
- Possible droughts and effects on rainwater collection.
- Sites for borehole abstraction.
- Pipeline delivery routes for water.
- Disruption caused by pipeline installation.
- Environmental consequences of massive groundwater abstraction.
- How mitigation can be achieved.
- Existing ph levels of local watercourses.
- Contamination of local water courses from incineration process.
- Combined effects of ph levels and contamination.
- Quenching of bottom ash and contaminated run-off.
- Effects of accidental discharges to Bodella brook.
- Effects of leaching from concrete waste bunkers.
- Adequacy/sufficiency of water toxicity testing.
- Adequacy of regulations regarding discharge consents.
- Best available techniques.
- Cleaner, greener, safer waste treatment technologies.

## Water

### INTRODUCTION

The proposed Mass Burn Incinerator is estimated to require **33 MILLION GALLONS** of water for every year of operation.

That is a total of **990,000,000** gallons if operational to 2042.

SITA seem unclear as to where or how they will obtain this vast quantity of water.

In their planning application, SITA mention mains water from a "town network", rainwater collection and groundwater sources. Utilizing any or all of these options have implications.

### QUESTIONS TO THE EA PERMITTING OFFICER

Which "town network" are they referring to?

Is the supply secure and adequate to cope with such an increase in demand?

How will the water be delivered to the site?

Will major works be required on the water supply infrastructure?

How much disruption and inconvenience will be inflicted on the human and ecological environments by any major works?

Who is liable for the cost and on-going maintenance resulting from any major works?

Will rainwater collection provide an adequate and consistent source of supply?

In times of low rainfall or drought how will the loss of this source of water be supplemented?

Will rainwater collection serve to divert water from the 'mitigating' landscape planting at the site?

Where will the borehole for groundwater abstraction be situated?

How will the water be 'delivered' to the site?

How will groundwater abstraction effect the ecological environments of SAC's/SSSI's/Wetland habitats etc.?

How invasive will the works associated with water abstraction by this method be?

How will any subsidence caused by the abstraction be mitigated?

With regards to water contamination, how will it be assured that **NO** contamination of local water sources occurs? It should be noted that the natural drain off from the site is into the River Fal, a distance of less than one mile. Any pollution from the site will have adverse effects on the Oyster farms in the Fal Estuary.

Watercourses around St.Dennis **ALREADY** show "significant failures" regarding their ph levels. No doubt due to pre-existing pollutants in the environment. Would it not be an abrogation of the duty of care we should have for our environment, to subject it to any further increase in environmental degradation?

## Water

Will it be ensured that water used for quenching Bottom Ash will not be discharged, even accidentally, into Bodella Brook?

There is a significant risk of contaminated water leaching from the concrete waste bunkers and therefore causing environmental damage. How can this be mitigated?

SITA will not undertake a water efficiency audit until 2 years of the Incinerator being operational. Any number of environmentally devastating incidents could occur during this time period. Potentially causing irreversible damage to the human and ecological environment and severely impacting the viability of the working farms in the immediate vicinity.

**Can any regulations or mitigation be considered sufficient to protect the vulnerable nature of the proposed site and its environs?**

SITA appears to have considered BAT options only in relation to the choice of **components** to be used in its Mass Burn Incinerator. They have not considered alternative technologies for waste treatment. Why?

There are many viable waste treatment technologies, other than Incineration. These alternatives are cleaner, greener and safer and have minimal environmental consequences.

In this day and age, with mounting pressure to do all we can to protect the environment from degradation and the effects of Climate Change, Incineration is **not** the **Best Available Technology**.