

Salutation

Re: dioxin emissions from the SELCHP incinerator

I am writing to draw your attention to information that has recently come to light regarding dioxin emissions from the SELCHP incinerator in South East London. I also want to ask you for a statement of support for a safer means of waste management.

The SELCHP incinerator is a major source of dioxin to air in London, even using its own reported figures. However we believe that dioxin emissions from the incinerator are consistently under-reported and that it emits much more dioxin than Londoners are told.

A recent inspection of the Environment Agency public register revealed a letter dated 3rd May 2001, which states that the legal level for dioxin emissions to air had been exceeded. Other documents on the register show that this was revealed by measurements taken on 31st January 2001.

This corroborates our view that significantly more dioxin is emitted from SELCHP and other incinerators than the current monitoring regime reveals. It is very likely that breaches of legal limits regularly go undetected because of the sporadic and infrequent nature of dioxin measurements at incinerators, which take place only for a few hours, four or five times a year.

Further evidence that higher levels of dioxin are emitted than reported is provided by emissions of the few gases that are continuously monitored by computers. These measurements show that SELCHP exceeded its permitted hourly concentrations for hydrogen chloride 10 times between October 2000 and February 2001, and six times between May and September 2001. At all these times it is likely that higher levels of dioxin were being emitted but not measured.

The emission of dioxin is an extremely serious matter. Dioxin is classified as a group 1, known human carcinogen.ⁱ The Government recently recommended a five-fold cut in the safety limit for intake of dioxin, bringing the UK into line with international opinion.ⁱⁱ However 30% of all people in the UK,ⁱⁱⁱ and 50% of toddlers^{iv} currently exceed this safety limit.

Using SELCHP's own emissions figures and the Government's recommended safety limit, the SELCHP incinerator emits enough dioxin every day to give 1 million people their maximum daily dose. One study has found that 30 – 50 times more dioxin may actually be released by incinerators than is reported by UK measuring methods.^v

Adding to the concerns expressed above, a second note on the public register, dated 1 May 2001, refers to particulate emissions during the period 28th & 29th of November 2000 also exceeding the legal limit. Particulate matter (or fine dust) from incinerators tends to have dioxins, heavy metals and other toxic matter adsorbed to it. This makes it extremely toxic as well as a health hazard in its own right because of the very fine nature of the particles involved.

It is also worrying that the Environment Agency inspector chose to dismiss these incidents because of "uncertainty" in the measurements. He also describes the breach as "slightly in excess" of the limit even it was 40% over. Greenpeace and others have raised questions over the way the Environment Agency regulates incinerators and the above incidents raise these questions again.

In view of the above it is our firm belief that that the SELCHP incinerator must close.

I would like to ask you for a statement of concern regarding pollution from London's incinerators and to support the alternative means of waste management outlined in the enclosed report.

I look forward to hearing from you on this important matter.

Yours faithfully

Mark Strutt
Head of Toxics Campaign

Enc. “How to comply with the Landfill Directive without incineration: a Greenpeace Blueprint”

ⁱ TCDD, the most toxic and best studied of the dioxin group, is classified as a Group 1 known human carcinogen by the International Agency for Research on Cancer (Part of the World Health Organisation). Emissions from incinerators are reported in units of toxic equivalence to TCDD.

ⁱⁱ Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment, COT/2001/07
October 2001

ⁱⁱⁱ Food Standards Agency, news release 16th Nov 2001 <http://www.food.gov.uk/news/newsarchive/dioxindiet>

^{iv} Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment. Statement on dietary exposure to dioxins and dioxin-like PCB's. COT Statement 2000/03. August 2000

^v R. De Fre, M Weavers (1998) Underestimation in dioxin emission inventories. Organohalogen Compounds
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