

Body of e-mail sent to Dr Tim du Feu, Acting Assistant Director, Environmental Protection,  
Planning and Environment Department  
DATE: 28th August 2010

A number of residents, fishermen and others who have 'suddenly' noticed EfW have contacted me on the subject of EfW, both on safety and environmental aspects. I recently examined the area (including the elevated angled horizontal exposed flue pipes ) with a visiting fire officer who attended Buncefield and who enlightened me with his professional expertise. So over and above the questions that I mailed Greg on 23rd August (so some questions may overlap ) here is what we would like to know:

## PROTOCOL

1: Could you let us know if you have yet given your permission, (or if Willie Peggie did so) regarding the dry commissioning that was mentioned in Will Gardiner's letter, dated 5th March 2010 addressed to Willie Peggie, then Assistant Director of Environmental Protection, attached to the Waste Management Licence, and if so can you publish it?

2: Can you let us know what the process exactly entails and why TTS left it so late to apply for the licence?

2: In response to our earlier mail on the subject of safety, Constable Mike Jackson has responded, and kindly copied me into an email from Will Gardiner (11th August) to the effect that TTS *"have a specific risk assessment agreed with all Regulators"*. We are keen to know what the wording of this agreement is, and if it has been published. If so, can we have a copy?

## SITE SAFETY

I: Richard Glover (Acting Assistant Director Performance & Operations) has confirmed that Condition 8 of the outline permission PP/2007/0050 (for EfW) makes a reference to a 'Major Incident Strategy'. Has this been replaced by the Draft Emergency Plan (15th August 2008) which was accepted on 16th October 2008 by the SOJ Fire Service?

**NOTE:** The report identifies several on site fire and gas hazards within the EfW complex, many of a common nature (i.e. fires in the bunker area; explosions in EfW boilers arising from contaminated wastes) Also identified as process risks are gas oil fire from the supply fed from the JEC alongside the hot flue pipes, steam leaks, release of poisonous flue gases, fire or explosion in flue gas cleaning system, and other toxic gases and chemicals stored and use within the compound.

Regarding off site hazards, the report highlights the proximity of Jersey Gas, the Fuel Consortium and the JEC. The Fuel consortium holding 13.630 tonnes of flammable oil, and talks *"...of the potential for an incident at any one of the neighbouring sites to initiate a major accident (i.e there could be a 'domino effect')"*. *Measures to control the risk associated with the fuel consortium establishment have been reviewed in the light of recommendations arising from the Buncefield enquiry. An incident at one of these establishments could impact on the EfW site, particularly if wind direction were to be westerly and northerly. "*

2: Why was it considered safe to site the plant where it has been? There is no positive recommendation in the Draft Emergency Plan and doubts are also cast on the emergency road in the Fire Service Report dated 16th October 2008. The report suggests that not fit for purpose now and won't be even when widened (see below).

The Fire Service Report dated 16th October 2008, (from M. Maquire, Director Safer Communities) says: *"It should be made clear that the proposed emergency access road leading from Harve (sic) des Pas is acceptable to this department only as an agreed interim measure to enable the development of the EfW plant."*

*It should be made clear that a full two way access and egress road leading from Harve des Pas (sic) passing to the east of the ash mound will be required for any further developments to be supported on the La Collette 11 site by this department."*

contd:

Our questions here are as follows:

**3:** If the proposed development road is only suitable as an interim measure to enable the development of EfW, does that mean it is sufficient when the plant is operational?

**4:** If not, then will a new two way road be necessary before EfW is fully operational, and if not, how can EfW be operated with an emergency escape road that the Fire Service deem is only agreed as an interim measure?

**5:** Given the above, are you satisfied with the safety aspects as identified and happy for the plant to be operated where it is?

## **THE MARINE ENVIRONMENT (RAMSAR AREA)**

As you know we still await answers to our submissions on the Water Discharge Permit applications dated 14th June 2010, addressed to you as (then) Head of Water Resources. Can you tell us when these questions are likely to be fully addressed? But pressinglly:

**1:** Are you satisfied that there will be no detrimental effect or change in character to the Ramsar Area at Havre des Pas, by the discharge of so much preheated treated water, especially at low tide? If so, what model/data do you have to back this up, given the lack of a proper EIA , and if you don't have either, how can you approve the licence?

**2:** Can you tell us why the JEC's application for continued use of biocide to treat cooling water wasn't addressed (the JEC just continued on) Why was there no examination of current practices and what will happen when EU regulations come into force?

**3:** Are you happy that the letter from Mr Tobias Salathé dated 30th March 2010 has still not been acknowledged and is apparently only now being dealt with by DEFRA and Planning?

**4:** Would you not agree that Mr Salathé as Senior Adviser to the Ramsar Directorate deserved at the very least an early response?

**5:** Would you support his request for a report under Article 3.2 or not? (NOTE: Please do not point us at DEFRA! - we are asking for your opinion!)

Kind Regards

Dave  
Co-ordinator  
Save Our Shoreline