



Pyrolysis Incinerator & Power Plant at Waterloo Industrial Estate

Baracud Energy Ltd have applied for planning permission for a pyrolysis incinerator and power plant burning refinery oily sludge and waste (filter cake). The proposed plant is to be sited at Waterloo Industrial Estate close to the Prince's Trust Watersports Centre and within the town of Pembroke Dock. The plant will generate 6mw of power. Supporters argue that it is a clean technology making use of a by-product of oil refining and creating jobs but we believe it is the wrong technology in the wrong place.

- **THE FUEL** Oily Sludge is a very dirty fuel containing high concentrations of hazardous constituents, including heavy metals (1) and naturally occurring radioactive material (2), that may be resistant to combustion. **It is generated in a refinery, why isn't it processed there?** If in future the petroleum industry contracts local supplies of oily sludge and refinery waste may become insufficient to keep the plant operating, leaving a toxic legacy.
- **TRANSPORT** All the material to be burnt will have to be brought in by road tanker through parts of Pembroke Dock or via the Haven. It is not clear how the toxic ash and scrubber sludge will be processed, we believe the only repository is many miles away in England, requiring further hazardous road traffic to remove it.
- **JOBS** After the construction phase is complete there will be just 12 unsustainable jobs. It may also deter other developments which have the potential to create many more jobs.
- **THE SITE** The proposed site is just above sea level and on the flood plane. It was previously used (1940-60) as a refuse tip and as such is reclaimed land with polluted soils. The buildings in the area are all low rise and there is housing and the watersports centre within 600m of the site.
- **HEALTH** The towns of Pembroke, Pembroke Dock, Neyland, Milford, Johnson & Haverfordwest lie within a 12 mile radius of the site, while the only monitoring station is 16 miles away in Narberth. Haverfordwest and Pembroke already have pollution problems due to nitrogen dioxide. (3) Of particular concern for health are the smaller particles, PM 2.5 or less and these are not currently monitored at all. (4) East Williamston and Cosherston, with its primary school just 3m above the elevation of the stack, are both downwind of the site. There are already 50 flue stacks & flares as well as the emissions from shipping and lorries. The cumulative effects of this pollution on health must be taken into account. (5)
- **CLIMATE CHANGE** It is now widely accepted that the world must move to renewables and away from fossil fuels which must be left in the ground unburnt. (6) We believe the ground is the only safe place for this toxic by-product and the future of Pembrokeshire is in renewables. (7)
- **THE ENVIRONMENTAL IMPACT** Pembroke Dock Town Council unanimously opposed this development, stating that there was not enough information in the EIS to make a decision. Milford Haven is a SSSI and there are 4 further SSSI's within 10km. The site is part of a world class Coastal National Park and natural harbour attracting visitors from throughout the UK and the world. We are its custodians.

We call on the PCC to reject this application and protect our children and their heritage

References

1. Journal of Hazardous Materials, 15/10/13 <http://www.sciencedirect.com/science/article/pii/S0304389413005487>
2. Norm Waste Strategy Consultation, January 2014 <http://www.scotland.gov.uk/resource/0044/00443257.pdf>
3. Air quality progress report 2014 http://www.pembrokeshire.gov.org/content.asp?nav=1626,110,935&parent_directory_id=646&id=5634
4. <http://www.welshairquality.co.uk>
5. EC Science for Environment Policy Air Pollution, Deadly Effects of Particulate matter (PM) shown in French study. <http://ec.europa.eu/environment/integration/research/newsalert/archive/air-pollution.htm>
6. <http://www.climatecentral.org/news/the-last-time-co2-was-this-high-humans-didnt-exist-15938>
7. <http://www.renewableenergyworld.com/rea/news/article/2015/01/us-solar-jobs-climb-22-percent-as-clean-power-aids-economic-recovery?cmpid=WNL-Friday-January16-2015>