

To Vivre

10 July 2014

For Publishing in Vivre, France Newsletter

From: Dr Ron Laurence McDowall

I am responding to the information continued in the Vivre web site Newslette and in the interests of providing balance to citizens who seek information on this issue, I would appreciate you displaying this response on your website.

As I indicated in my introduction to the community meeting in the 18th June, I am an International Consultant to UN-FAO in Rome. I have been a permanent consultant to FAO for more than ten years. Before (previous 30 years) that I was an international Consultant to several sections of the UN, namely UNEP Basel Convention and the Stockholm Conventions, UNDP and UNIDO. In addition I have consulted as Scientist to the World Bank and other international agencies.

When Tredi SA was owned by the Government of France I consulted to the Department of Environment for hazardous waste and worked with the waste department. Since Tredi was privatised some ten years ago I have not contracted my services to that company. In addition I have never contracted my consulting services to ORICA of Australia.

I object to your assertion that I am some sort of advocate for incineration companies or for Tredi. Quite the reverse is true. I travel all over the world on behalf of FAO dealing with large stockpiles of hazardous and toxic waste. Often it is possible to use non incineration technology but in the main for high chlorinated POPs it is the only technology we can use. In Vietnam I was able to recommend two non incineration technologies for soil contaminated with Agent Orange dioxins.

I was the author of the main piece of research work on promising emerging non incineration technologies for POPs referenced below. In that work it was clear that many of the technologies referenced could deal with low concentrations of POPs e.g. BCD technology for low concentration PCB. Generally, however, we find that the waste is high chlorine levels and high concentrations that they must be incinerated. There was reference to the GPCR technology in your piece. Yes, when GPCR was working it could theoretically deal with HCB. However there are no commercial GPCR plants left running in the world. The one in Australia was decommissioned some ten years ago. The other issue is that none of the technologies listed in the work cited below could deal with HCB contaminated material like drums, pallets, concrete, pipes etc. The incineration plant in Salaise obviously can.

I write a lot of documents for the UN and in particular I write Technical Guidelines. These can be found on the Basel.int web site. These documents usually offer several destruction technologies that can be used around the world. In the main however the reality is for high strength POPs, High Temperature Incineration (HTI) is the only feasible option and I make no apologies for that.

All the technologies that exist in Australia are infeasible for a variety of reasons, including length of time of development, lack of capability to destroy HCB waste, issues with obtaining permits and the significant development and pilot testing that would be required. Most of the technologies in Australia are very small scale and all of them would have significant issues upscaling and developing for instance new types of HCB desorbers and the like.

In terms of accepting the HCB waste at the Tredi Salaise plant it should be noted that the total tonnage (9000 tonne) will be treated over five years as the HCB waste must be blended into the facility's general waste stream. Over the period of five years the plant will dispose of

more than 1.5 million tonne of hazardous waste. The contribution of the Orica HCB is therefore very small.

You can find all the reports and Technical Guidelines I have written for the UNEP over many years along with project reports for FAO on my web site www.mcdowall.ac.nz

Ref: UNEP-STAP Report 2004

REVIEW OF EMERGING, INNOVATIVE TECHNOLOGIES FOR THE DESTRUCTION AND DECONTAMINATION OF POPS AND THE IDENTIFICATION OF PROMISING TECHNOLOGIES FOR USE IN DEVELOPING COUNTRIES

http://archive.basel.int/techmatters/review_pop_feb04.pdf

Kind regards

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