

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Tradebe Healthcare National Limited
Rochester Clinical Waste Treatment Facility
Medway City Estate
Enterprise Close
Rochester
Kent
ME2 4LY

Variation application number

EPR/WP3036ZR/V006

Permit number

EPR/WP3036ZR

Rochester Clinical Waste Treatment Facility

Permit number EPR/WP3036ZR

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made.

This variation permits the replacement of the autoclave on site with a steam auger and also allows the treatment of waste type 18 01 04 (wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers). This waste type will be treated through the steam auger followed by light compaction, following the submission and approval under Pre-Operational Conditions.

In addition an increase to the limit in the annually treated throughput tonnage from 16,000 tpa to 24,000 tpa is permitted, with no overall increase in the waste quantities currently permitted for storage at the site.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Waste disposal licence P/3/31	01/04/1993	Original licence granted to Parkerdell Refining Limited.
Licence issued under the powers of the Environment Agency WML 19395	01/04/1996	
Licence modified	09/03/1999	
Licence modified	02/06/2006	
Application EPR/EP3793SK/T001 (WML 101185) Partial transfer of permit EPR/TP3798HJ/T004 (WML 101185)	Duly made 20/10/2009	
Partial transfer determined EPR/EP3793SK/T001	05/02/2010	Polkacrest Limited - EPR/EP3793SK Parkerdell Refining Limited - EPR/TP3798HJ
Application EPR/EP3793SK/V002, variation of permit EPR/ EP3793SK (WML 101185)	Duly made 20/10/09	
Additional information received	16/03/2010	
Variation determined EPR/EP3793SK	07/05/2010	Variation issued.
Transfer application EPR/UP3131HE/T001 (full transfer of permit EPR/EP3793SK)	Duly made 17/02/2011	From Polkacrest Limited to SITA UK Limited.

Status log of the permit		
Description	Date	Comments
Transfer determined EPR/UP3131HE	21/03/2011	Full transfer of permit complete.
Transfer application EPR/WP3036ZR/T001 (full transfer of permit EPR/UP3131HE)	04/02/2013	From SITA UK Limited to Polkacrest Limited.
Transfer determined EPR/WP3036ZR	20/02/2013	Full transfer of permit complete.
Variation application EPR/WP3036ZR/V002	Duly made 19/03/2013	Variation to amend name of legal entity from Polkacrest Limited to SITA Healthcare Limited.
Variation determined EPR/WP3036ZR/V002	09/04/2013	Variation issued to SITA Healthcare Limited.
Agency variation determined EPR/WP3036ZR/V003	20/12/2013	Agency variation to implement the changes introduced by Industrial Emissions Directive (IED).
Variation application EPR/WP3036ZR/V004	Duly made 13/10/2014	Application to vary the permit to treat waste codes 18 01 02 and 18 01 04.
Additional information received	03/12/2014	Request to change operator name from SITA Healthcare Limited to Tradebe Healthcare National Limited.
Variation determined EPR/WP3036ZR/V004	08/12/2014	Varied permit issued.
Variation Application EPR/WP3036ZR/V005	Duly made 05/06/2015	Application to extend the permitted boundary for additional storage space.
Additional information	05/06/2015	Revised site plans outlining division between waste types, Revised H1 risk assessment. Permit boundary overlap agreement.
Additional information	04/06/2015	Confirmed containers designed to prevent water ingress. Confirmed clinical waste containers stored on vehicles are inside sealed articulated units. Confirmed flock stored inside enclosed compactor skips.
Variation determined EPR/WP3036ZR/V005 (Billing Ref: LP3435AZ)	15/09/2015	Varied permit issued.
Application EPR/WP3036ZR/V006 (variation and consolidation)	10/01/2019	Application to vary and update the permit to change treatment from autoclave to steam auger and allow treatment and compaction of single waste code. An increase in quantity of site throughput of treated wastes was also permitted.
Variation determined EPR/WP3036ZR (Billing Ref: GP3434QJ)	23/05/2019	Varied and consolidated permit issued.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/WP3036ZR

Issued to

Tradebe Healthcare National Limited (“the operator”)

whose registered office is

**Atlas House
Third Avenue
Globe Park
Marlow
Buckinghamshire
SL7 1EY**

company registration number **03882534**

to operate a regulated facility at

**Rochester Clinical Waste Treatment Facility
Medway City Estate
Enterprise Close
Rochester
Kent
ME2 4LY**

to the extent set out in the schedules.

The notice shall take effect from 23/05/2019

Name	Date
Philip Lamb	23/05/2019

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/WP3036ZR

This is the consolidated permit referred to in the variation and consolidation notice for application **EPR/WP3036ZR/V006** authorising,

Tradebe Healthcare National Limited (“the operator”)

whose registered office is

**Atlas House
Third Avenue
Globe Park
Marlow
Buckinghamshire
SL7 1EY**

company registration number **03882534**

to operate a regulated facility at

**Rochester Clinical Waste Treatment Facility
Medway City Estate
Enterprise Close
Rochester
Kent
ME2 4LY**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Philip Lamb	23/05/2019

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme or other approval issued by the Environment Agency.

1.2 Accident management plan

- 1.2.1 The operator shall:
- (a) maintain and implement an accident management plan;
 - (b) review and record at least every 4 years or as soon as practicable after an accident, (whichever is the earlier) whether changes to the plan should be made;
 - (c) make any appropriate changes to the plan identified by a review.

1.3 Energy efficiency

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) the operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.4 Efficient use of raw materials

- 1.4.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) the operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.5 Avoidance, recovery and disposal of wastes produced by the activities

- 1.5.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.5.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site location plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2 and S2.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;

- (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.
- 2.3.7 Measures shall be implemented and maintained throughout the operational life of the installation to monitor and control the presence of pests on the installation. Such measures shall prevent pests being attracted to the installation in numbers that are likely to:
- (a) cause harm to human health or the quality of the environment,
 - (b) cause offence to any human senses,
 - (c) result in damage to material property, or
 - (d) impair or interfere with amenities and other legitimate uses of the environment.
- 2.3.8 Measures shall be implemented and maintained throughout the operational life of the installation to control and monitor the presence of scavenging birds and other scavengers on the installation. Such measures shall prevent scavenging birds and other scavengers from gathering on operational areas or scavenging wastes in a manner likely to:
- (a) cause harm to human health or the quality of the environment,
 - (b) cause offence to any human senses,
 - (c) result in damage to material property, or
 - (d) impair or interfere with amenities and other legitimate uses of the environment.
- 2.3.9 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational conditions

- 2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4A have been completed.
- 2.5.2 The operations specified in schedule 1 table S1.4B shall not commence until the measures specified in that table have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2;
 - (b) process monitoring as specified in table S3.3; and
 - (c) ambient air monitoring specified in table S3.4.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Fire prevention

- 3.6.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
 - (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR5) a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data; and
 - (b) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.3; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.3 A(1)(a)(ii)	D9 – Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds of mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.	The D9 treatment of hazardous waste shall include both the thermal/chemical disinfection and shredding/maceration. There shall be no mixing of hazardous waste. The hazardous waste types permitted for treatment set out in table S2.2.
AR2	S5.6 A(1)(a)	D15 – Storage of wastes pending any of the operations numbered D1 to D14 and R13 (excluding temporary storage, pending collection, on the site where it is produced).	The hazardous waste types permitted for storage set out in table S2.3.
Directly Associated Activity			
AR3	Storage of raw materials		Raw materials limited to those listed in table S2.1 only
AR4	Bin washing		Washing of waste containers used to bring waste to the site only
AR5	Steam generation		On site generation of steam for use in steam auger only
Activity reference	Description of activities for waste operations		Limits of activities
AR6	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced) D14: Repackaging of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced). D15: Storage of wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).		Waste storage/transfer operations shall be limited to: Non-hazardous waste types as specified in table S2.3.
AR7	D14: Repackaging prior to submission to any of the operations numbered D1 to D13; R12: Exchange of waste for submission to any of the operations numbered R1 to R11.		Light compaction of non-hazardous offensive waste. The maximum treatment capacity shall not exceed 50 tonnes/day. The non-hazardous waste type, 18 01 04, permitted for treatment set out in table S2.3.

Table S1.1 activities		
AR8	D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12.	<p>Thermal treatment (including pre-shredding) in stream auger and subsequent maceration of non-hazardous waste.</p> <p>Treatment shall only take place within the treatment building shown on plan attached at Schedule 7.</p> <p>The maximum treatment for disposal (D9) capacity for non-hazardous waste on site shall not exceed 45 tonnes/day.</p> <p>The non-hazardous waste types permitted for treatment set out in table S2.2.</p>

Table S1.2 Operating techniques		
Description	Parts	Date Received
Variation Application EPR/WP3036ZR/V002	All	28/08/2009
Further information EPR/WP3036ZR/V002	Response to Schedule 5 Notice	30/03/2010
Response to Not Duly Made additional information request	<p>Supporting information V2 May 2015 - Waste types and maximum weights</p> <p>Assessment against EPR 5.07 – storage of waste appropriate measures document</p> <p>Response to questions 1, 4, 7, 8, 9 and 10 regarding Clinical and healthcare wastes stored in additional area for transfer only</p> <p>Operating techniques</p> <p>Revised site plans outlining division between waste types.</p> <p>Revised H1 risk assessment</p> <p>Permit boundary overlap agreement</p>	29/05/2015
Response to request for additional information	<p>Confirmed containers designed to prevent water ingress</p> <p>Confirmed clinical waste containers stored on vehicles are inside sealed articulated units.</p> <p>Confirmed treated flock stored inside enclosed compactor skips.</p>	04/06/2015
Variation application EPR/WP3036ZR/V006	<p>Responses to Part C2 and C3 of the Application Form – Variation Report (Final) and Appendices</p> <p>Odour Management Plan, Part C, Appendix 11 (470293) dated November 2018</p>	10/01/2019
Response to request for additional information	Information in provide in response to the request made by the Environment Agency related to an updated H1 Risk Assessment.	21/03/2019

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>A written report on raw material usage shall be submitted to the Environment Agency for approval. The report shall include:</p> <ul style="list-style-type: none"> a review of the first year's raw material consumption 	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> a raw materials minimisation plan identifying all areas for improvement with targets for reduced raw material consumption 	
IC2	<p>A written report on energy efficiency shall be submitted to the Environment Agency for approval. The report shall include:</p> <ul style="list-style-type: none"> a review of the first year's energy consumption an energy efficiency plan identifying all areas for improvement with targets for improved energy efficiency 	Complete
IC3	<p>A written report on the predicted discharges to sewer shall be submitted to the Environment Agency for approval. The report shall include:</p> <ul style="list-style-type: none"> the probability of sewer bypass, via storm/emergency overflows or at intermediate sewage pumping stations the percentage of the time the Wastewater Treatment Works is bypassed; an estimate of the increased annual load of metals and persistent substances which will result from bypassing; a summary of action plans in the event of bypass such as knowing when bypass is occurring, or shutting down, or justification if there is to be no action taken; summary of the events that could cause a release which could adversely effect the sewage treatment works and what actions (e.g. holding tanks, monitoring, batch release etc.) and actions taken to prevent this; details of the treatment provided at the wastewater treatment works and how this compares to that which would be achieved if the effluent were treated on-site, based on reduction of load (not concentration) of each substance to the receiving water; and any improvements identified, where appropriate the report shall contain different dates for implementing different measures. <p>The notification requirements of condition 2.4.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>Any improvements shall be implemented by the Operator from the date of approval by the Environment Agency in writing.</p>	Complete
IC4	<p>A written risk assessment considering the risk of fugitive emissions from the installation and the need to undertake ambient air and surface monitoring should be provided to the Environment Agency. The report shall include:</p> <ul style="list-style-type: none"> necessary preventative measures for fugitive emissions; a recommendation about undertaking ambient air and surface monitoring; a scale drawing showing any proposed monitoring locations any proposed sampling frequency any proposed trigger levels for the parameters monitored action plan that identifies actions to be taken should trigger levels be exceeded if monitoring is proposed. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.</p> <p>Any proposed preventative measures and monitoring shall be implemented from the date of approval by the Environment Agency.</p>	Complete
IC5	<p>The operator shall undertake testing to characterise the emissions from the steam auger treatment process (including the pre-shedder). This shall include, but shall not be limited to, particulate matter, ammonia, total volatile organic compounds (TVOCs). A monitoring and assessment plan shall be submitted to the Environment Agency for approval prior to commencing testing.</p> <p>The operator shall provide a written report to the Environment Agency that provides full details of the characterisation testing undertaken and the results.</p> <p>The written report should set out any on-going point source air emissions monitoring to be required under Table S3.1.</p>	Within 6 months of the issue of this permit, testing should be complete and a report submitted and approved in writing with

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
		the Environment Agency within 3 months
IC6	<p>The operator shall submit a written report to the Environment Agency for approval that includes the results of a reassessment of the impact of hazardous pollutants on the emissions of sewer from the site using the Environment Agency's 'H1 Environmental Risk Assessment' tool (or equivalent as agreed with the Environment Agency).</p> <p>A monitoring and assessment plan shall be submitted to the Environment Agency for approval prior to commencing testing.</p>	Within 12 months of the issue of this Permit

Table S1.4A Pre-operational measures		
Reference	Pre-operational measures	Completion
1	<p>A written waste pre-acceptance procedure shall be submitted to the Environment Agency for approval. The procedure shall take account of the principles specified in Section A6 - 2.1.1 of Appendix 6 of Sector Guidance Note IPPC 5.06 dated December 2004 for wastes classified wholly or partly under one or more of the following list of waste codes 18 01 01, 18 01 02, 18 01 03*, 18 01 04, 18 01 08*, 18 01 09, 18 01 10*, 18 02 01, 18 02 02*, 18 02 03, 18 02 07, and 18 02 08*:</p> <ul style="list-style-type: none"> • ensure that only waste suitable for treatment is accepted for treatment at the installation; • provide detail of the waste producer and process that produced the waste; • include the quantity and type of each waste; and • include a reliable audit of the waste, prior to acceptance, at the site that shows that waste has been appropriately segregated and identified. <p>You must implement the procedure as approved, and from the date stipulated by the Environment Agency.</p>	Complete
2	<p>A written waste acceptance procedure shall be submitted to the Environment Agency for approval. The procedure shall take account of the principles specified in section 2.1.2 of Sector Guidance Note IPPC 5.06 dated December 2004 for wastes classified wholly or partly under one or more of the following list of waste codes 18 01 01, 18 01 02, 18 01 03*, 18 01 04, 18 01 08*, 18 01 09, 18 01 10*, 18 02 01, 18 02 02*, 18 02 03, 18 02 07, and 18 02 08*:</p> <ul style="list-style-type: none"> • a record of the inspection regime for each load and justification for the selection of this option; • visual inspection before offloading where safety is not compromised. • identification and safe management of waste transported in a vehicles or packaged in a manner that does not meet the requirements for the carriage of that waste. This should include prevention of further occurrences, and reporting of the details of each load to the Environment Agency. <p>You must implement the procedure as approved, and from the date stipulated by the Environment Agency.</p>	Complete
3	<p>A written waste acceptance procedure for relevant wastes listed in Table S3.3 shall be submitted to the Environment Agency for approval. The procedure shall take account of the principles specified in section 2.1.1 of</p>	Ongoing

Table S1.4A Pre-operational measures		
Reference	Pre-operational measures	Completion
	<p>Sector Guidance Note IPPC 5.06 dated December 2004. As a minimum the procedure shall:</p> <ul style="list-style-type: none"> • ensure that only waste suitable for transfer is accepted for transfer at the installation; • provide detail of the waste producer and process that produced the waste; • include the quantity and type of each waste; and • include a reliable audit of the waste, prior to acceptance, at the site that shows that waste has been appropriately segregated and identified. <p>You must implement the procedure as approved, and from the date stipulated by the Environment Agency.</p>	
4	<p>A written validation report of the new plant operation should be provided to the Environment Agency having regards to the requirements of Sector Guidance Note IPPC S5.06, including Appendix 6 Supplementary Guidance for clinical wastes. The report shall include:</p> <ul style="list-style-type: none"> • a microbial efficacy analysis, that demonstrates that the choice of test organisms, the method of introduction to the plant, the choice of organism carrier, and the analytical method are adequate to demonstrate STAATT level III criteria for a worst case scenario challenge load; • evidence that the parametric controls, and procedures for real-time monitoring and assessment of outputs, are in place with respect to any waste treated; • evidence that the parametric control data relates to microbial efficacy so that waste can therefore be considered to be treated satisfactorily on the basis of parametric control alone; • an environmental monitoring assessment of the site that addresses process emissions; and • an assessment of any improvements identified. <p>The treatment activities referenced in schedule 1, table S1.1 (A1) shall not be brought into operation until the operator receives written confirmation from the Environment Agency that the validation report has been agreed.</p>	Complete
5	<p>The treatment (shredding only) of 18 01 04 shall not be brought into operation until the operator has submitted detailed plans to the Environment Agency regarding operational procedures, management system and infrastructure changes and agreement to these plans has been received in writing from the Environment Agency.</p>	No longer required

Table S1.4B Pre-operational measures for future development		
Reference	Operation	Pre-operational measures
1	<p>Treatment (by shredding and steam auger) of waste coded as 18 01 04 in Table S2.2.</p>	<p>A written justification for the treatment (by steam auger) of waste coded as 18 01 04 in table S2.2 of this permit, shall be submitted to the Environment Agency for approval. As a minimum, the justification shall take into account the principles specified in the sector guidance note for Clinical Waste EPR 5.07. The justification should address whether the treatment of 18 01 04 is effective, including validation of the process using worst case scenarios;</p>

Table S1.4B Pre-operational measures for future development		
Reference	Operation	Pre-operational measures
		<ul style="list-style-type: none"> • is an efficient use of energy and raw materials; • impedes waste recovery or recycling; • compromises the treatment of any hazardous waste; • has an effect on emissions from the activity. <p>No waste coded as 18 01 04 in Table S2.2 shall be accepted for treatment (by shredding and steam auger) unless the Environment Agency has given prior written approval under this condition.</p>
2	Pre-operational measure for future development to justify the compaction of 18 01 04	The treatment (compaction) of 18 01 04 shall not be brought into operation until the operator has submitted detailed plans to the Environment Agency regarding operational procedures, management system and infrastructure changes and agreement to these plans has been received in writing from the Environment Agency.
3	Treatment of all waste codes in Table S2.2 by steam auger.	<p>The operator shall submit a written commissioning validation report for the steam auger to the Environment Agency for approval, that demonstrates:</p> <ul style="list-style-type: none"> (i) the treatment efficacy of the waste facility, in accordance with the appropriate measures in Sections 2.1, 2.3 and Annex 1 of the sector guidance note EPR S5.07 on clinical wastes; (ii) the proposals for routine monitoring of treatment efficacy comply with the appropriate measures in section 3.2 and Annex 2 of the sector guidance note EPR S5.07 on clinical wastes; (iii) the installation's emissions, in accordance with the appropriate measures in Section 3.3 and Annex 3 of the sector guidance note EPR S5.07 on clinical wastes; (iv) the proposals for routine monitoring of emissions comply with the appropriate measures in section 3.3 and Annex 3 of the sector guidance note EPR S5.07 on clinical wastes. <p>The steam auger shall not be made operational until the Environment Agency has given prior written approval under this condition.</p>

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Water	For bin washing and steam generation only
Oil	Lubricating oil only
Detergent	For bin washing only

Table S2.2 Permitted waste types and quantities for treatment (D9)	
Maximum quantity	45 tonnes at any one time and a maximum of 24,000 tonnes per annum
Waste code	Description
18 01 02	blood bags and blood preserves only (except 18 01 03)
18 01 03* ¹	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)
18 02 02* ¹	wastes whose collection and disposal is subject to special requirements in order to prevent infection
20 01 99 ¹	other fractions not otherwise specified (comprising only of separately collected fractions of municipal clinical waste (not arising from healthcare and/or related research i.e. not including waste from natal care, diagnosis, treatment or prevention of disease) which is subject to special requirements in order to prevent infection)
<p>¹ The following wastes are specifically excluded from waste treatment activities from this waste code:</p> <p>(i) Any waste containing waste medicines and chemicals, waste contaminated with cytotoxic and cytostatic medicines, anatomical waste (identifiable human or animal tissue arising from healthcare), or Dental amalgam;</p> <p>(ii) Sharps boxes containing any of the excluded wastes from (i) and (iii) or Sharps that are contaminated with pharmaceuticals in any quantity (including syringes that are fully discharged, partially discharged or undischarged).</p> <p>(iii) Biohazard waste: Any waste known or likely to contain ACDP Hazard Group 4 biological agents; Any waste from a containment level 3 laboratory: and all Microbiological cultures from any source, and, any potentially infected waste from pathology departments and other clinical or research laboratories (Unless steam auger treated before leaving the site of production).</p>	

Table S2.3 Permitted waste types and quantities for storage (D15/R13) and repackaging (D14)	
Maximum quantity	50 tonnes at any one time
Waste code	Description
07 02 13 ²	waste plastic
07 02 17 ²	wastes containing silicones other than those mentioned in 07 02 16
08 01 11* ²	waste paint and varnish containing organic solvents or other dangerous substances
08 01 12 ²	waste paint and varnish other than those mentioned in 08 01 11
08 01 13* ²	sludges from paint or varnish containing organic solvents or other dangerous substances
08 01 14	sludges from paint or varnish other than those mentioned in 08 01 13
08 01 15* ²	aqueous sludges containing paint or varnish containing organic solvents or other dangerous substances
08 01 16 ²	aqueous sludges containing paint or varnish other than those mentioned in 08 01 15
08 01 17* ²	wastes from paint or varnish removal containing organic solvents or other dangerous substances
08 01 18 ²	wastes from paint or varnish removal other than those mentioned in 08 01 17
08 01 19* ²	aqueous suspensions containing paint or varnish containing organic solvents or other dangerous substances
08 01 20 ²	aqueous suspensions containing paint or varnish other than those mentioned in 08 01 19
08 01 21* ²	waste paint or varnish remover
08 02 01 ²	waste coating powders
08 03 07 ²	aqueous sludges containing ink
08 03 08 ²	aqueous liquid waste containing ink
08 03 12* ²	waste ink containing dangerous substances
08 03 13 ²	waste ink other than those mentioned in 08 03 12
08 03 14* ²	ink sludges containing dangerous substances
08 03 15 ²	ink sludges other than those mentioned in 08 03 14
08 03 16* ²	waste etching solutions
08 03 17* ²	waste printing toner containing dangerous substances
08 03 18 ²	waste printing toner other than those mentioned in 08 03 17
08 03 19* ²	disperse oil
08 04 09* ²	waste adhesives and sealants containing organic solvents or other dangerous substances
08 04 10 ²	waste adhesives and sealants other than those mentioned in 08 04 09
08 04 11* ²	adhesive and sealant sludges containing organic solvents or other dangerous substances
08 04 12 ²	adhesive and sealant sludges other than those mentioned in 08 04 11
08 04 13* ²	aqueous sludges containing adhesives or sealants containing organic solvents or other dangerous substances
08 04 14 ²	aqueous sludges containing adhesives or sealants other than those mentioned in 08 04 13
08 04 15* ²	aqueous liquid waste containing adhesives or sealants containing organic solvents or other dangerous substances
08 04 16 ²	aqueous liquid waste containing adhesives or sealants other than those mentioned in 08 04 15

Table S2.3 Permitted waste types and quantities for storage (D15/R13) and repackaging (D14)	
Maximum quantity	50 tonnes at any one time
Waste code	Description
09 01 01*2	water-based developer and activator solutions
09 01 02*2	water-based offset plate developer solutions
09 01 03*2	solvent-based developer solutions
09 01 04*2	fixer solutions
09 01 05*2	bleach solutions and bleach fixer solutions
09 01 06*2	wastes containing silver from on-site treatment of photographic wastes
09 01 07 ²	photographic film and paper containing silver or silver compounds
09 01 08 ²	photographic film and paper free of silver or silver compounds
09 01 13*2	aqueous liquid waste from on-site reclamation of silver other than those mentioned in 09 01 06
13 01 10*2	mineral based non-chlorinated hydraulic oils
13 01 11*2	synthetic hydraulic oils
13 01 12*2	readily biodegradable hydraulic oils
13 01 13*2	other hydraulic oils
13 02 05*2	mineral-based non-chlorinated engine, gear and lubricating oils
13 02 06*2	synthetic engine, gear and lubricating oils
13 02 07*2	readily biodegradable engine, gear and lubricating oils
13 02 08*2	other engine, gear and lubricating oils
15 01 01 ²	paper and cardboard packaging
15 01 02 ²	plastic packaging
15 01 03 ²	wooden packaging
15 01 04 ²	metallic packaging
15 01 05 ²	composite packaging
15 01 06 ²	mixed packaging
15 01 07 ²	glass packaging
15 01 09 ²	textile packaging
15 01 10*2	packaging containing residues of or contaminated by dangerous substances
15 02 02*2	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances
15 02 03 ²	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16 01 15 ²	antifreeze fluids other than those mentioned in 16 01 14
18 01 01	sharps (except 18 01 03)
18 01 02	Body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection

Table S2.3 Permitted waste types and quantities for storage (D15/R13) and repackaging (D14)	
Maximum quantity	50 tonnes at any one time
Waste code	Description
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers) (This is limited to non-clinical human offensive/hygiene waste and autoclaved waste from laboratories only)
18 01 06*	chemicals consisting of or containing dangerous substances (excluding X-ray photochemicals)
18 01 07	chemicals other than those mentioned in 18 01 06 (excluding X-ray photochemicals)
18 01 08*	cytotoxic and cytostatic medicines
18 01 09	medicines other than those mentioned in 18 01 08
18 01 10 ²	amalgam waste from dental care
18 02 01	sharps (except 18 02 02)
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection. (This is limited to non-clinical animal offensive/hygiene waste and autoclaved waste from laboratories only)
18 02 05*	chemicals consisting of or containing dangerous substances (excluding X-ray photochemicals)
18 02 06	chemicals other than those mentioned in 18 02 05 (excluding X-ray photochemicals)
18 02 07*	cytotoxic and cytostatic medicines
18 02 08	medicines other than those mentioned in 18 02 07
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20 01 01 ²	paper and cardboard
20 01 21* ²	fluorescent tubes and other mercury-containing waste
20 01 40 ²	Metals
20 01 99	other fractions not otherwise specified (comprising only of non-clinical human and animal offensive/hygiene waste (not arising from healthcare and/or related research i.e. not including waste from natal care, diagnosis, treatment or prevention of disease) which is not subject to special requirements in order to prevent infection)
¹ This is limited to wastes of this type arising from medical practices or associated research activities. ² The acceptance of these wastes is restricted subject to agreement with the Environment Agency under pre-operational condition reference 3.	

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (inc. unit)	Reference period	Monitoring frequency	Monitoring standard or method
Air extraction point from shredder A1 [as referenced in plan on Schedule 7 of this Permit]	Shredder extraction vent	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3
Steam Auger A2, [as referenced in plan on Schedule 7 of this Permit]	Steam auger vent	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3	To be agreed in accordance with IC5 in Table S1.3
Boiler Stack A3	Boiler ventilation point	No parameters set	No limits set	-	-	-

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 Waste Water	Effluent discharge	Bacillus Spores (spiked organisms)	300 cfu/litre Note ¹	-	Annually	In accordance with the sector guidance note for Clinical Waste EPR 5.07.
Note ¹ : These benchmarks are indicative only, are based on a specific input dose, and will be reviewed periodically						

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Steam treatment of waste	Treatment efficacy (routine monitoring)	-	-	In accordance with guidance in Annex 2 of the sector guidance note for Clinical Waste EPR 5.07.

Table S3.4 Ambient air monitoring requirements / Fugitive bioaerosol emissions monitoring (spiked organisms)					
Location or description of point of measurement	Parameter	Limit (cfu)	Monitoring frequency	Monitoring standard or method	Other specifications
Air – sample points <10m from the treatment plant	Bacillus spores	1,000 ^{Note2} cfu per cubic metre ^{Note1}	Annually	In accordance with the sector guidance note for Clinical Waste EPR 5.07.	-
Air – sample points >10m from the treatment plant	Bacillus spores	300 ^{Note2} cfu per cubic metre ^{Note1}	Annually	In accordance with the sector guidance note for Clinical Waste EPR 5.07.	-
Surface – sample points <10m from the treatment plant	Bacillus spores	20,000 ^{Note2} cfu per square metre per hour ^{Note1}	Annually	In accordance with the sector guidance note for Clinical Waste EPR 5.07.	-
Surface – sample points >10m from the treatment plant	Bacillus spores	5,000 ^{Note2} cfu per square metre per hour ^{Note1}	Annually	In accordance with the sector guidance note for Clinical Waste EPR 5.07.	-
<p>Note¹ These Units relate to the overall monitoring period so the cfu benchmark applies to:</p> <ul style="list-style-type: none"> • Each individual sample of air taken, with a calculation made to report the result per cubic metre. • For each individual settle plate (this is not an average)– a calculation made to adjust for surface area of a settle plate and exposure time (for example if settle plates are deployed for only 15 minutes of every hour then the result must be multiplied by 4). • Each individual sample of water taken, with a calculation made to report the result per litre. <p>Note² These benchmarks are indicative only, are based on a specific input dose, and will be reviewed periodically.</p>					

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1 and A2	To be agreed in accordance with IC5 in Table S1.3	1 January
Emissions to sewer Parameters as required by condition 3.5.1	S1	Annually	1 January
Ambient air monitoring Parameters as required by condition 3.5.1		Annually	1 January
Efficacy monitoring as required by condition 3.5.1	Steam Auger as installed	Every 3 months	1 January

Table S4.2 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S4.3 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency	03/04/3019
Sewer	Form sewer 1 or other form as agreed in writing by the Environment Agency	03/04/3019
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	03/04/3019
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	03/04/3019
Raw material usage	Form performance 1 or other form as agreed in writing by the Environment Agency	03/04/3019

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“clinical waste” means waste from a healthcare activity (including veterinary healthcare) that:

- contains viable micro-organisms or their toxins which are known or reliably believed to cause disease in humans or other living organisms;
- contains or is contaminated with a medicine that contains a biologically active pharmaceutical agent; or
- is a sharp, or a body fluid or other biological material (including human and animal tissue) containing or contaminated with a hazardous substance;

and waste of a similar nature from a non-healthcare activity.

“cytotoxic and cytostatic medicines” are medicinal products that possess one or more of the hazardous properties toxic, carcinogenic, mutagenic or toxic for reproduction. Cytotoxic and cytostatic waste is the fraction of waste medicines, as described below for “medicines”, that contains or is contaminated with cytotoxic and cytostatic medicines.

“D” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

“Healthcare waste” means a waste classified under Chapter 18 of the List of Wastes, that is both:

- produced by human and animal healthcare and/or related activities; and

- is of a type specifically associated with such activities.

“Impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term “sealed drainage system” below.

“Industrial Emissions Directive” means Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medicines” are “medicinal products” as defined in Regulation 130 of Part VIII of the Medicines Act 1968. Waste medicines (or pharmaceutical waste) include:

- expired, unused, spilt and contaminated medical products that are no longer required and need to be disposed of appropriately;
- discarded items contaminated with medicines such as bottles or boxes with residues, gloves, masks, connecting tubing, syringe bodies and drug vials.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants.

“notify/notified without delay” means that a telephone call can be used, whereas all other reports and notifications must be supplied in writing, either electronically or on paper.

“offensive waste” means waste that:

- is not clinical waste;
- contains body fluids, secretions or excretions; and
- falls within the description of code 18 01 04, 18 02 03 or 20 01 99 in the list of wastes.

“pollution” includes pollution of the environment, harm to human health and serious detriment to the amenities of the locality, resulting from the permitted activities.

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“sealed container” for the purposes of this permit, means a container which is fully enclosed, weather proof, does not allow any solid or liquid content to escape and is lockable.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- (a) no liquid will run off the surface otherwise than via the system;
- (b) except where they may lawfully be discharged, all liquids entering the system are collected in a sealed sump.

"Sharps" means items that could cause cuts or puncture wounds. They include needles, hypodermic needles, scalpels and other blades, knives, infusion sets, saws, broken glass, and nails.

"Waste code" means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

"Waste Framework Directive" or "WFD" means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

"year" means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

"year" means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table 2.2 for that table/those tables they have the meaning given below:

'hazardous substance' means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

'heavy metal' means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances.

'PCBs' means:

- polychlorinated biphenyls;
- polychlorinated terphenyls;
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane;
- any mixture containing any of the above mentioned substances in a total of more than 0.005% by weight.

'transition metals' means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

'stabilisation' means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

'solidification' means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

'partly stabilised wastes' means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

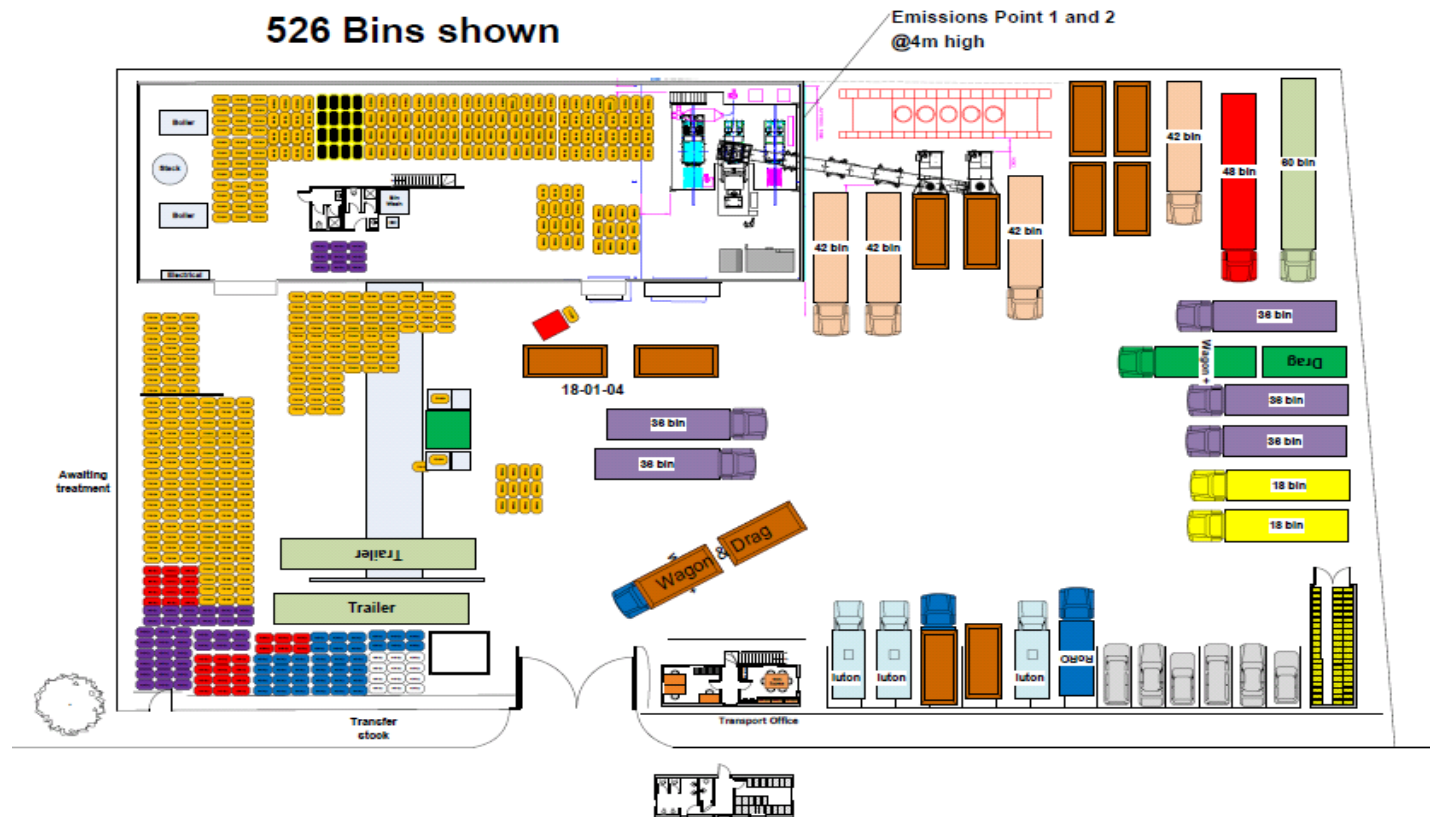
Schedule 7 – Site plan

Site layout plan



Upstairs facilities

TRADEBE HEALTHCARE ROCHESTER – steam auger



Site location plan – Showing installation boundary.



END OF PERMIT

Permit number
EPR/WP3036ZR

Permit Number: EPR/WP3036ZR

Operator: Tradebe Healthcare National Limited

Facility: Rochester Clinical Waste Treatment and Transfer Station

Form Number: Air1/ 03/04/2019

Reporting of emissions to air for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]

1. The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
2. Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Environment Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
3. For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
4. The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed
(Authorised to sign as representative of Operator)

Date

Permit Number: EPR/WP3036ZR

Operator: Tradebe Healthcare National Limited

Facility: Rochester Clinical Waste Treatment and Transfer Station

Form Number: Sewer1 / 03/04/2019

Reporting of emissions to sewer for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]
Waste water - sewer	Bacillus spores (spiked organisms)						

1. The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
2. Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Environment Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
3. For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
4. The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed
(Authorised to sign as representative of Operator)

Date

Permit Number: EPR/WP3036ZR

Operator: Tradebe Healthcare National Limited

Facility: Rochester Clinical Waste Treatment and Transfer Station

Form Number: Water Usage1 / 03/04/2019

Reporting of Water Usage for the year

Water Source	Usage (m ³ /year)	Specific Usage (m ³ /unit output)
Mains water		
Site borehole		
River abstraction		
TOTAL WATER USAGE		

Operator's comments:

Signed
(authorised to sign as representative of Operator)

Date

Permit Number: EPR/WP3036ZR

Operator: Tradebe Healthcare National Limited

Facility: Rochester Clinical Waste Treatment and Transfer Station

Form Number: Energy1 / 03/04/2019

Reporting of Energy Usage for the year

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh		
Natural Gas	MWh		
Gas Oil	tonnes		
Recovered Fuel Oil	tonnes		
TOTAL	-		

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments:

Signed
(Authorised to sign as representative of Operator)

Date

Permit Number: EPR/WP3036ZR

Operator: Tradebe Healthcare National Limited

Facility: Rochester Clinical Waste Treatment and Transfer Station

Form Number: Performance1 / 03/04/2019

Reporting of other performance indicators for the period DD/MM/YYYY to DD/MM/YYYY

Parameter	Units
Water usage	tonnes
Energy usage	MWh
Total raw material used	tonnes

Operator's comments:

Signed
(Authorised to sign as representative of Operator)

Date