

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Tradebe Healthcare (South West) Limited

Tradebe Healthcare (South West) Limited

Units C & D

203 Burcott Road

Avonmouth

Bristol

BS11 8AP

Variation application number

EPR/GP3698EM/V003

Permit number

EPR/GP3698EM

Tradebe Healthcare (South West) Limited

Permit number EPR/GP3698EM

Introductory note

This introductory note does not form a part of the notice.

Under the Environmental Permitting (England & Wales) Regulations 2010 (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. All the conditions of the permit have been varied and are subject to the right of appeal.

The permit allows the treatment of clinical waste to render the waste safe and the storage and transfer of hazardous and non-hazardous clinical and healthcare waste. Hazardous and non-hazardous clinical waste is brought to the site in 770 litre bins and treated at the site using a hot oil auger in order to render the clinical waste safe. Once the 770 litre bins have been off-loaded they are stored in designated areas within the site for processing. The waste is then shredded and processed through the heat treatment process. The non-hazardous wastes approved for treatment are used as flock material suitable for Refuse Derived Fuel (RDF) once treated.

This variation is to increase the waste treatment and storage capacity of the site. The hazardous waste treatment capacity is increased from 10 to 18 tonnes per day (tpd) while the storage capacity is increased from 10 to 25 tonnes. The non-hazardous treatment capacity is reduced from 50 tpd to 18 tpd while the storage capacity is increased to 50 tonnes at any one time. Wastes will be stored in designated areas to ensure different waste types are kept separate. A quarantine area is provided for non-confirming waste. All waste containers are locked when in storage or transport.

The overall annual waste throughput is reduced from 25,000 tonnes to 7,000 tonnes.

As a result of these changes the fixed condition licence is varied to installation and waste operation permits.

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
Application received	Duly made 28/01/08	Application for Clinical Waste and Healthcare Waste Treatment and Transfer Station.
Permit determined EAWML 100334	04/07/08	Original permit issued to Ecowaste South West Limited
Variation application received EPR/GP3698EM/V002	28/01/13	Change of Company name and Registered address
Variation determined EPR/GP3698EM	18/02/2013	Varied permit issued
Application EPR/GP3698EM/V003 (variation and consolidation)	Duly made 07/01/15	Application to vary and update the permit to modern conditions.

Status log of the permit		
Description	Date	Comments
Additional information	16/02/15	Confirmation of annual waste tonnage and storage for recovery.
	20/02/15	Response to question on treatment of non-hazardous wastes.
	25/02/15	<ul style="list-style-type: none"> • Revised site plan received. • Response to question on the waste code 19 02 99. • Request to add waste code 19 02 10 received.
	27/02/15	Technical detail on boiler unit received.
Variation determined EPR/GP3698EM (Billing ref. LP3934WR)	26/03/15	Varied and consolidated permit issued in modern condition format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2010

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010 varies and consolidates

Permit number

EPR/GP3698EM

Issued to

Tradebe Healthcare (South West) Limited ("the operator")

whose registered office is

**The Ca'd'oro
45 Gordon Street
Glasgow
G1 3PE**

company registration number SC302160

to operate regulated facilities at

**Tradebe Healthcare (South West) Limited
Units C & D
203 Burcott Road
Avonmouth
Bristol
BS11 8AP**

to the extent set out in the schedules.

The notice shall take effect from 26/03/2015

Name	Date
Claire Roberts	26/03/2015

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 2010

Permit number

EPR/GP3698EM

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/GP3698EM/V003 authorising,

Tradebe Healthcare (South West) Limited (“the operator”),

whose registered office is

The Ca'd'oro
45 Gordon Street
Glasgow
G1 3PE

company registration number SC302160

to operate an installation at

Tradebe Healthcare (South West) Limited

Units C & D
203 Burcott Road
Avonmouth
Bristol
BS11 8AP

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

Name	Date
Claire Roberts	26/03/2015

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.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (A1, A3, A4 and A5) 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.

1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (A1, A3, A4 and A5) 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.

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

- 1.4.1 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.
- 1.4.2 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 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 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 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3, S2.4, S2.5, S2.6; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.4 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.
- 2.3.5 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.

Hazardous waste storage and treatment

- 2.3.6 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.

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.
- 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;
- (b) bioaerosol monitoring specified in table S3.2
- (c) efficacy monitoring specified in table S3.3.

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 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
- (b) implement the pests management 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 (A1, A3, A5 and A6) 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;
- (b) the annual production /treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 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 S4.4 ; 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 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, 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
A1	5.3A(1)(a)(ii)	<p>Treatment in a hot oil auger for the purpose of</p> <p>D9: Disposal of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment of clinical waste or</p> <p>R3: Recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment of clinical waste</p>	<p>Treatment operations shall be limited to shredding/maceration and thermal treatment by means of hot oil auger.</p> <p>The maximum quantity of hazardous clinical waste treated shall not exceed 18 tonnes per day.</p> <p>The hazardous waste types permitted for treatment are specified in table S2.2.</p>
Directly Associated Activity			
A2	Storage of hazardous clinical waste	<p>D15: Storage of waste pending physico-chemical treatment for disposal.</p> <p>R13: Storage of hazardous waste pending physico-chemical treatment for recovery.</p>	<p>No more than 25 tonnes of hazardous waste shall be stored on site at any one time.</p> <p>Waste types as specified in Tables S2.2 and S2.3.</p>
A3	Bin washing	Operation of bin washer for the washing and disinfection of mobile containers (waste bins and carts).	Washing and disinfection of mobile containers shall take place on areas of impermeable surface with sealed drainage system.
A4	Waste compactor	Compaction of waste following treatment.	Compaction shall be limited to treated (disinfected) wastes only.
A5	Gas fuelled heater	Operation of 470 kW Thermal Fluid Heater burning natural gas with thermal input capacity of 598.5 kW for oil heating.	<p>From receipt of gas fuel, to release of combustion products to air.</p> <p>The use of gas heater is limited to the heating oil used in the hot oil auger.</p>
Activity reference	Description of activities for waste operations		Limits of activities

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
A6	<p>R3: Recycling/reclamation of non-hazardous waste (organic substances).</p> <p>D15: Storage pending offsite disposal.</p> <p>R13: Storage of non-hazardous waste pending recovery.</p> <p>D14: Repackaging prior to offsite transfer.</p>		<p>Treatment operations shall be limited to shredding/maceration, compaction, thermal treatment by means of hot oil auger and repackaging.</p> <p>Compaction shall be limited to treated wastes.</p> <p>The treatment of non-hazardous waste for recovery shall not exceed 18 tonnes per day.</p> <p>The maximum quantity of non-hazardous stored at the site at any one time shall not exceed 50 tonnes.</p> <p>The non-hazardous waste types permitted for treatment for use as Refuse Derived Fuel (RDF) are specified in table S2.4.</p> <p>The waste types permitted for storage (D15 and R13) are specified in table S2.5.</p> <p>The waste types permitted for repackaging (D14) are as specified in table S2.6.</p>

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	<p>All waste treatment activities shall only take place within a building with an impermeable surface with sealed drainage.</p> <p>Compaction shall be limited to treated wastes.</p> <p>All permitted waste shall either be stored:</p> <ul style="list-style-type: none"> • within a building provided with an impermeable surface with sealed drainage; or • within sealed containers located on an impermeable surface with sealed drainage. Sealed containers shall be kept locked when not being loaded or unloaded. <p>Rigid containers for the storage of waste shall be of a design that:</p> <ul style="list-style-type: none"> • will prevent the escape of any liquid; • has a lockable lid or other means of securing the container. <p>Waste containing or contaminated with cytotoxic and cytostatic medicines shall be kept separate from other wastes.</p> <p>Waste medicines, amalgam and sharps should be kept separate from each other and other wastes and stored in a secure place.</p> <p>Body parts and organs shall be stored in designated</p>	Duly Made 28/01/08

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<p>refrigerated units within a building.</p> <p>Wastes which arrive in bags or other non-rigid containers shall be transferred into rigid containers immediately</p> <p>The transfer of waste from vehicles or containers into other containers shall only take place on areas with an impermeable surface with sealed drainage.</p> <p>Washing and disinfection of mobile containers must take place on areas of impermeable surface with sealed drainage.</p>	
Application EPR/GP3698EM/V003	<p>Appendix 1 –Variation Application Supporting Information in response to section 5c – non-technical summary of your application, part C2 of the application form.</p> <p>Avonmouth Environmental Risk Assessment in response to section 6 - Environmental risk assessment, part C2 of the application form.</p> <p>Response to Table 3 – Technical standards, part C3 of the application form and referenced technical guidance notes.</p> <p>Monthly Efficacy monitoring- 7.8.3- Efficacy testing in response to section 4a - measures for monitoring emissions, part C3 of the application form.</p> <p>Response to Appendix 4 – Specific questions for the clinical waste sector, part C3 of the application form and referenced waste pre-acceptance and acceptance documents.</p> <p>Response to Appendix 1 – Specific questions for waste facilities that accept clinical waste, part C4 of the application form and referenced validation document.</p>	07/01/15
Additional information	Response to questions on annual waste tonnage, efficacy monitoring requirements and storage for recovery.	16/02/15
	Response to question on treatment of non-hazardous wastes.	20/02/15

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

Table S2.2 Permitted waste types and quantities for hazardous clinical waste treatment	
Maximum quantity	The total quantity of wastes listed in tables S2.2, S2.3, S2.4, S2.5 and S2.6 accepted at the site shall not exceed 7,000 tonnes per year.
Exclusions	Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics: <ul style="list-style-type: none"> • Wastes that are not: <ul style="list-style-type: none"> i) bagged; or ii) sealed in UN approved packaging; or iii) in other appropriate packaging. • Wastes that are in a form that is sludge, gas or powder.
Waste code	Description
18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 03 ^{*1}	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 02 ^{*1}	wastes whose collection and disposal is subject to special requirements in order to prevent infection
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
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).

¹ In addition, the following wastes are specifically excluded from waste treatment activities:

(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;

(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).

(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 autoclaved before leaving the site of production).

Table S2.3 Permitted waste types and quantities for hazardous clinical waste storage and transfer	
Maximum quantity	The total quantity of wastes listed in tables S2.2, S2.3, S2.4, S2.5 and S2.6 accepted at the site shall not exceed 7,000 tonnes per year.
Exclusions	Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics: <ul style="list-style-type: none"> • Wastes that are not: <ol style="list-style-type: none"> i) bagged; or ii) sealed in UN approved packaging; or iii) in other appropriate packaging. • Wastes that are in a form that is sludge, gas or powder.
Waste code	Description
18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 01 06*	chemicals consisting of or containing dangerous substances
18 01 08*	cytotoxic and cytostatic medicines
18 01 10*	amalgam waste from dental care
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 05*	chemicals consisting of or containing dangerous substances
18 02 07*	cytotoxic and cytostatic medicines
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 31*	cytotoxic and cytostatic medicines

Table S2.4 Permitted waste types and quantities for non-hazardous clinical waste treatment	
Maximum quantity	The total quantity of wastes listed in tables S2.2, S2.3, S2.4, S2.5 and S2.6 accepted at the site shall not exceed 7,000 tonnes per year.
Exclusions	Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics: <ul style="list-style-type: none"> • Wastes that are not: <ol style="list-style-type: none"> i) bagged; or ii) sealed in UN approved packaging; or iii) in other appropriate packaging. • Wastes that are in a form that is sludge, gas or powder.
Waste code	Description

18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	sharps (except 18 01 03) ¹
18 01 02	plasma bags only ¹
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)(Non-clinical human and offensive waste only) ¹
¹ These entries are limited to those wastes that are not described, packaged, labelled or transported as infectious or clinical wastes.	

Table S2.5 Permitted waste types and quantities for non-hazardous clinical waste storage and transfer	
Maximum quantity	The total quantity of wastes listed in tables S2.2, S2.3, S2.4, S2.5 and S2.6 accepted at the site shall not exceed 7,000 tonnes per year.
Exclusions	Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics: <ul style="list-style-type: none"> • Wastes that are not: <ol style="list-style-type: none"> i) bagged; or ii) sealed in UN approved packaging; or iii) in other appropriate packaging. • Wastes that are in a form that is sludge, gas or powder.
Waste code	Description
18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	sharps (except 18 01 03) ²
18 01 02	body parts and organs including blood bags and blood preserves (except 18 01 03) ¹
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)(Non-clinical human and offensive waste only) ¹
18 01 07	chemicals other than those mentioned in 18 01 06
18 01 09	medicines other than those mentioned in 18 01 08
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	sharps (except 18 02 02) ¹
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (Non-clinical animal hygiene and offensive waste only) ¹
18 02 06	chemicals other than those mentioned in 18 02 05
18 02 08	medicines other than those mentioned in 18 02 07
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE

19 02	wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 32	medicines other than those mentioned in 20 01 31
20 01 99	other fractions not otherwise specified (comprising only of human and animal 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
¹ These entries are limited to those wastes that are not described, packaged, labelled or transported as infectious or clinical wastes.	

Table S2.6 Permitted waste types and quantities for non-hazardous clinical waste repackaging	
Maximum quantity	The total quantity of wastes listed in tables S2.2, S2.3, S2.4, S2.5 and S2.6 accepted at the site shall not exceed 7,000 tonnes per year.
Exclusions	Notwithstanding the specification of waste types below, wastes shall not be accepted at the site which have any of the following characteristics: <ul style="list-style-type: none"> • Wastes that are not: <ol style="list-style-type: none"> i) bagged; or ii) sealed in UN approved packaging; or iii) in other appropriate packaging. • Wastes that are in a form that is sludge, gas or powder.
Waste code	Description
18	WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (EXCEPT KITCHEN AND RESTAURANT WASTES NOT ARISING FROM IMMEDIATE HEALTH CARE)
18 01	wastes from natal care, diagnosis, treatment or prevention of disease in humans
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)(Non-clinical human and offensive waste only) ¹
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (Non-clinical animal hygiene and offensive waste only) ¹
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 99	other fractions not otherwise specified (comprising only of human and animal 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
¹ These entries are limited to those wastes that are not described, packaged, labelled or transported as infectious or clinical wastes.	

Schedule 3 – Emissions and monitoring

Emission point ref. & location	Parameter	Limit (including unit)	Monitoring frequency	Monitoring standard or method
Emission point 1 - Point source process emissions to air from Hot oil auger shown on the site plan in schedule 7	Bacillus spores	1000cfu ⁽²⁾ /m ³⁽¹⁾	Annually	As specified in Sector Guidance Note EPR S5.07 – How to comply with your environmental permit - additional guidance for clinical waste, Version 1.1 January 2011.
	Chemicals	To be agreed with the Agency	To be agreed with the Agency	
Emission point 2: Emissions from gas heater as shown on the site plan in schedule 7	-	-	-	
Waste water	Bacillus spores	300cfu ⁽²⁾ /litre ⁽¹⁾	Annually	

(1): These units relate to the overall monitoring period so the cfu benchmark applies to each individual sample of air or water taken, with a calculation made to report the result per cubic metre or litre. These are based on a seeding dose of 1 x 10⁶ spores per gram of waste load, and would need to be adjusted if the seed dose were higher or lower.

(2): These benchmarks are indicative only, and will be reviewed periodically.

Monitoring Location	Parameter	Monitoring frequencies	Limit (including unit)	Monitoring standard and method
Air – sample points <10m from the treatment plant.	Bacillus spores	Annually	1000 cfu/m ³⁽¹⁾	As specified in Sector Guidance Note EPR S5.07 – How to comply with your environmental permit - additional guidance for clinical waste, Version 1.1 January 2011.
Air – sample points >10m from the treatment plant	Bacillus spores	Annually	300 cfu/m ³⁽¹⁾	
Surface – sample point < 10m from the treatment plant	Bacillus spores	Annually	20000 ⁽²⁾ cfu/m ² /hr ⁽¹⁾	
Surface – sample points > 10 m from the treatment plant.	Bacillus spores	Annually	5000 ⁽²⁾ cfu/m ² /hr ⁽¹⁾	

(1): These Units relate to the overall monitoring period so the cfu benchmark applies to

- 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.

(2): These benchmarks are indicative only, and will be reviewed periodically.

Table S3.3 Process monitoring requirements				
Emission point ref. & location	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Efficacy monitoring of hot oil auger as installed	Spore testing to demonstrate whether STAATT Level III Criteria for microbial inactivation has been achieved	Monthly	In accordance with Annex 2 of Sector Guidance Note EPR S5.07 – How to comply with your environmental permit - additional guidance for clinical waste, Version 1.1 January 2011.	-

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
Point source emissions Parameters as required by condition 3.5.1.	Point source process emissions to air and waste water	Every 12 months	1 January
Fugitive bioaerosol emissions monitoring Parameters as required by condition 3.5.1	Air sample points <10m from the treatment plant. Air sample points >10m from the treatment plant Surface sample point < 10m from the treatment plant Surface ample points > 10 m from the treatment plant	Every 12 months	1 January
Efficacy monitoring Parameters as required by condition 3.5.1	Hot oil auger as installed	Every 3 months	1 January, 1 April, 1 July, 1 October

Table S4.2: Annual production/treatment	
Parameter	Units
Quantity of hazardous waste treated in the Hot Oil Auger per year	tonnes
Quantity of non-hazardous waste treated in the Hot Oil Auger per year	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency	26/03/15
Waste water	Form waste water 1 or other form as agreed in writing by the Environment Agency	26/03/15
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	26/03/15
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	26/03/15
Other performance	Form performance 1 or other form as agreed in writing	26/03/15

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
indicators	by the Environment Agency	
Efficacy	As agreed in writing by the Environment Agency	26/03/15

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	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measured value and uncertainty	
Date and time of monitoring	
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 Tradebe Healthcare (South West) Limited

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.

“*clinical waste*”, Clinical Waste is defined in the Controlled Waste Regulations 1992 as:

- i) any waste which consists wholly or partly of human or animal tissue, blood or other body fluids, excretions, drugs or other pharmaceutical products, swabs or dressings, or syringes, needles or other sharp instruments, being waste which unless rendered safe may prove hazardous to any person coming into contact with it; and
- ii) any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it..

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

“*cytotoxic and cytostatic medicines*” means any medicinal product that possesses one or more of the hazardous properties H6 Toxic, H7 Carcinogenic, H10 Toxic for Reproduction and H11 Mutagenic.

“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.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 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 given in Schedule 3 of the Hazardous Waste (England and Wales) Regulations 2005 No.894 and the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138).

“*healthcare waste*” means a waste classified under Chapter 18 of the List of Wastes, which is waste from Human and Animal Health Care and/or Related Research.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

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

Pests” means Birds, Vermin and Insects.

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

“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.

"*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 (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, 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

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.

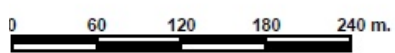
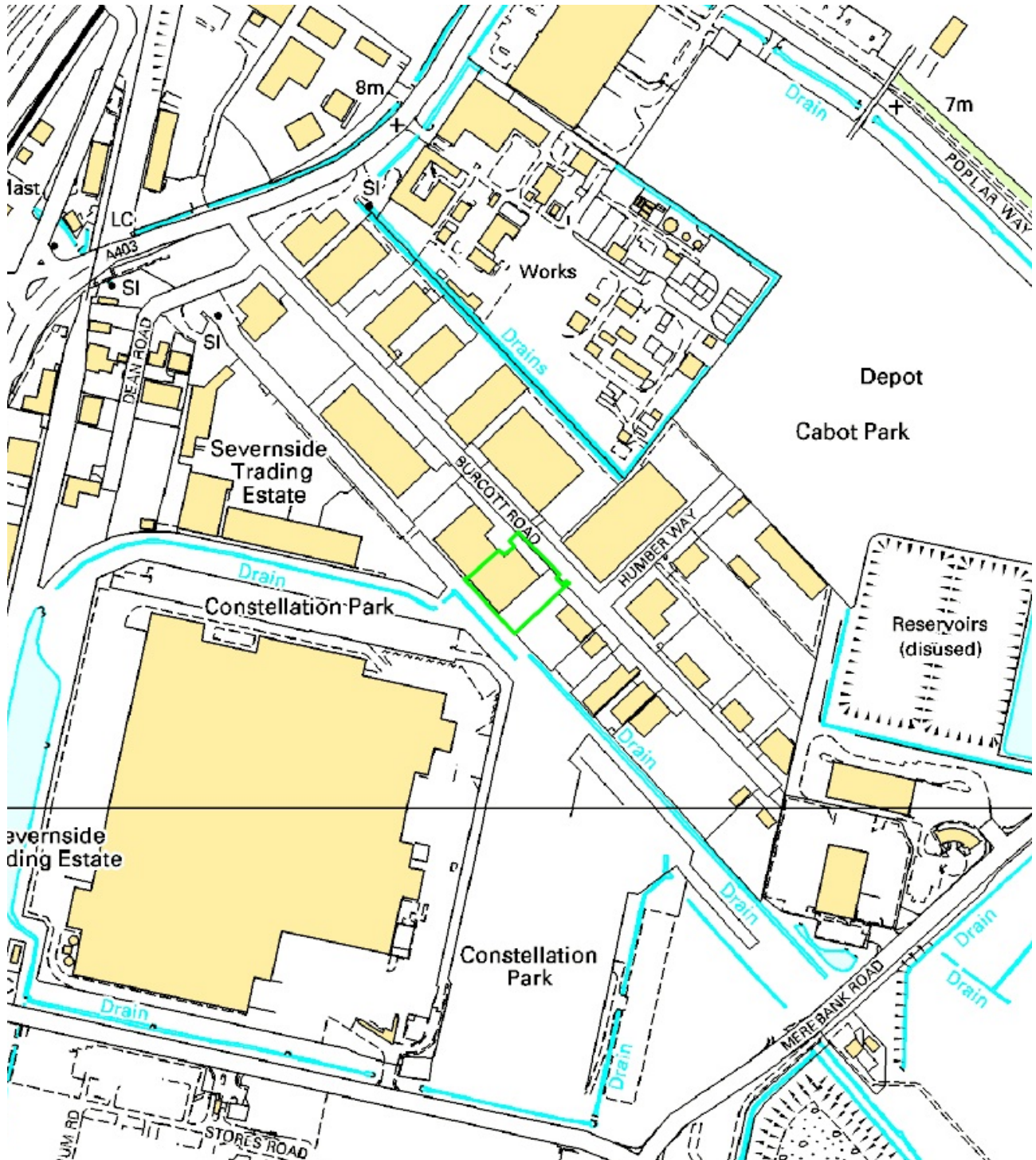
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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.

Schedule 7 – Site plan

Site location



— Permit Boundary



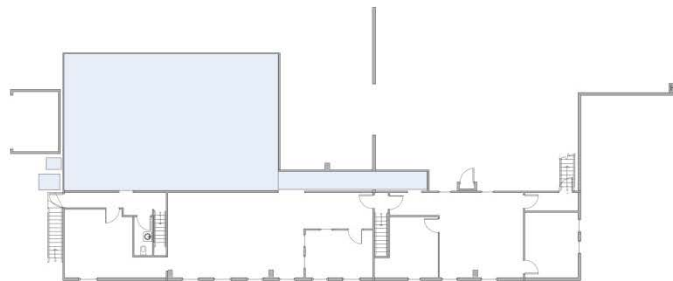
“©Crown Copyright. All rights reserved. Environment Agency, 100026380, 2015.”

Permit number
EPR/GP3698EM

Site Layout Plan



GROUND FLOOR



FIRST FLOOR

END OF PERMIT

Permit Number: EPR/GP3698EM Operator: Tradebe Healthcare (South West) Limited
Facility: Tradebe Healthcare (South West) Limited Form Number: Air1 / DD/MM/YY

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 Date.....

(Authorised to sign as representative of Tradebe Healthcare (South West) Limited)

Permit Number: EPR/GP3698EM Operator: Tradebe Healthcare (South West) Limited
Facility: Tradebe Healthcare (South West) Limited Form Number: Air1 / DD/MM/YY

Reporting of emissions to waste water 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]

5. 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.
6. 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.
7. 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.
8. The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed Date.....

(Authorised to sign as representative of Tradebe Healthcare (South West) Limited)

Permit Number: EPR/GP3698EM

Operator: Tradebe Healthcare (South West) Limited

Facility: Tradebe Healthcare (South West) Limited

Form Number: WaterUsage1 / DD/MM/YY

Reporting of Water Usage for the year YYYY

Water Source	Usage (m³/year)	Specific Usage (m³/unit output)
Mains water		
Site borehole		
River abstraction		
TOTAL WATER USAGE		

Operator's comments:

Signed Date.....

(Authorised to sign as representative of Tradebe Healthcare (South West) Limited)

Permit Number: **EPR/GP3698EM**

Facility: **Tradebe Healthcare
(South West) Limited**

Operator: **Tradebe Healthcare
(South West) Limited**

Form Number: **Energy1 / DD/MM/YY**

Reporting of Energy Usage for the year YYYY

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

Date.....

(Authorised to sign as representative of Operator)

Permit Number: **EPR/GP3698EM** **Operator:** **Tradebe Healthcare
(South West) Limited**

Facility: **Tradebe Healthcare
(South West) Limited** **Form Number:** **Performance1 / DD/MM/YY**

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

Parameter	Units
Quantity of hazardous waste treated in the Hot Oil Auger per year	tonnes
Quantity of non-hazardous waste treated in the Hot Oil Auger per year	tonnes

Operator's comments:

Signed Date.....

(Authorised to sign as representative of Tradebe Healthcare (South West) Limited)