

Permitting decisions

Bespoke permit

We have decided to grant the permit for Stericycle Telford Healthcare Waste Treatment Plant and Transfer Station operated by SRCL Limited.

The permit number is EPR/MP3303SQ.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#).

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

Key issues of the decision

Site description

The installation comprises of the following activities:

- Section 5.3 Part A(1)(a)(ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment;
- Section 5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes.

And directly associated activities:

- Steam generation;
- Storage of residues from the treatment process;
- Container washing.

The following waste operations are also carried out:

- Physico-chemical treatment non-hazardous healthcare waste (blood products);
- Mechanical shredding of offensive waste;
- Repackaging of offensive waste – light compaction;
- Storage of non-hazardous waste.

The hazardous waste treatment plant consists of a shredder, a single chamber steam auger and pollution abatement equipment. Waste is shredded under negative pressure before transfer to the auger chamber where a combination of heat, moisture and residence time is sufficient to disinfect the waste to produce an inactivated waste flock. Steam is supplied to the auger from the gas fired steam raising plant.

There is a separate shredder (the cold shred line) for mechanical re-processing of non-hazardous healthcare wastes. Waste is shredded under negative pressure and is then transferred through an enclosed transportation screw. This meets the inactivated flock from the treatment process (post auger) before being discharged into a walking floor trailer where it is stored prior to transfer off-site.

Off-gases from the auger are cooled in a condenser with the resulting water being discharged to foul sewer. Any residual gases are transferred through the abatement system with the off-gases from the shredder system.

The abatement system comprises a high efficiency particulate air (HEPA) filter and carbon filters serving each shredder. A coalescing vessel and a carbon filter serve the steam auger. These are designed to remove any infectious bio-aerosols, excess moisture and any residual organic compounds and odours from the off-gases before their release to atmosphere.

There is a single emission point to air from the treatment processes where the final off-gases are released, and a further associated emission point to air from the gas-fired steam raising plant. There is also an emission point to foul sewer for effluent arising from the treatment process condensate and for effluent arising from the container washing process. There are no emissions to surface water arising from the activities at the site.

The shredded and treated residue is stored on site pending transfer off-site for disposal to landfill or for recovery and use as a refuse derived fuel.

The thermal waste treatment process and mechanical treatment of offensive waste is undertaken wholly within the process building with no treatment activities being undertaken outside the building. Light compaction of offensive waste is the only activity which occurs externally however this will be under a canopy enclosed on three sides. Waste is stored in designated storage areas inside the building and in a designated trailer holding area outside of the building. All designated storage areas have impermeable surfaces with sealed drainage and all waste is stored in fully enclosed, leak-proof containers.

The site is located on at the end of Stafford Park 18 Industrial Estate. All adjacent property and land is in commercial/industrial use and the site is less than two miles from Junction 4 of the M54 motorway. The nearest built up residential area to the site is the Hollinswood Estate approximately 580 m to the West. The site is located within flood zone 1 with a low probability of flooding and the nearest watercourse is Wesley Brook, 1.3 km to the North East.

Emission to Air

Emissions to Air were assessed using our H1 methodology for the emissions from the small (<1 MWth) gas fired boiler (emission point A2) and NO₂ emissions were screened against the criteria set out in screen out in our guidance *Air emissions risk assessment for your environmental permit* as shown in the table below.

Table 1 – Predicted impacts								
Pollutant	Environmental Quality Standard (EQS) (µg/m ³)	Process Contribution (PC) (µg/m ³)	% of EQS	Screened Out	Background (µg/m ³)	Predicted Environmental Concentration (PEC) µg/m ³	% of EQS	Screened Out
NO ₂ annual mean	40	1.24	3.1	No	15.98	17.22	43.1	Yes
NO ₂ hourly mean	200	11.9	5.94	Yes	-	-	-	-

We have not set emission limits or monitoring for this small boiler (<1 MW thermal) as the overall emissions are low and monitoring requirements would be disproportionate.

Emissions from the treatment plant abatement system (emission point A1) serving the shredders and the heat treatment plant have not been assessed as the abatement is for the removal of bioaerosols and odour, via a combination of coalescing filter, high efficiency particulate air (HEPA) filters and carbon abatement. The proposed abatement plant is considered BAT for the process emissions. Efficacy testing of the treatment process in accordance with our guidance on Clinical Waste EPR5.07 is required, using known concentrations of bacillus spores added to the treatment process. A limit of 1000 colony forming units (cfu) per cubic metre is set for A1, in accordance with EPR5.07.

Emission to Sewer

The site has an emission point to sewer (S1) for site treatment process effluent from the heat treatment process, container washing and site housekeeping requirements. External hardstanding surface areas of the site will also drain to sewer. There are considered to be no hazardous pollutants in the process effluent or washings. Efficacy testing of the treatment process in accordance with our guidance on Clinical Waste EPR5.07 is required, using known concentrations of bacillus spores added to the treatment process. A limit of 300 colony forming units (cfu) per litre is set for S1, in accordance with EPR5.07. Pre-operational condition PO2 is our standard pre-operational measure for validation of the treatment process to ensure that the treated waste is rendered safe. This also includes details of routine ongoing monitoring of the efficacy of the treatment process and emissions, in accordance with EPR5.07.

Pre-operational conditions

Pre-operational condition PO1 concerns the discharge to sewer and requires the operator to submit the following for approval prior to discharging any effluent to sewer:

- a) a copy of the Trade Effluent Discharge Consent for the site – the operator has not yet obtained consent from the sewerage undertaker
- b) written confirmation that the works required for the Drainage and Fire Water Retention Strategies are completed. Any changes made during construction shall be submitted.

Pre-operational condition PO2 is our standard pre-operational measure for validation of the treatment process to ensure that the treated waste is rendered safe. This also includes details of routine ongoing monitoring of the efficacy of the treatment process and emissions, in accordance with EPR5.07.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made. The decision was taken in accordance with our guidance on confidentiality.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: Food Standards Agency Local Authority – Planning Local Authority – Environmental Health Health and Safety Executive Director of Public Health/Public Health England Shropshire Fire & Rescue Service Sewerage Undertaker (Severn Trent Water) The comments and our responses are summarised in the consultation section .
Operator	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	We considered the extent and nature of the facilities at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation'. The extent of the facilities are defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit. The site comprises the following: An installation with the following listed activities and directly associated activities (DAAs): <ul style="list-style-type: none"> • Section 5.3 Part A(1)(a)(ii) Disposal or recovery of hazardous waste

Aspect considered	Decision
	<p>with a capacity exceeding 10 tonnes per day involving physico-chemical treatment (D9, R3)</p> <ul style="list-style-type: none"> • Section 5.6 A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes (D15, R13) • Steam raising boiler (DAA) • Raw material handling and storage (DAA) • Bin washing (DAA) • Waste storage (DAA) <p>And the following waste operations:</p> <ul style="list-style-type: none"> • Physico-chemical treatment of non-hazardous waste by thermal treatment, shredding (D9, R3) • Repackaging of non-hazardous waste by light compaction (D14, R12) • Storage of non-hazardous waste (D15, R13)
The site	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
Environmental risk assessment	
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be categorised as environmentally insignificant. See Key Issues Section.</p>

Aspect considered	Decision
Climate change adaptation	We have assessed the climate change adaptation risk assessment. We consider the climate change adaptation risk assessment is satisfactory.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.
Operating techniques for emissions that screen out as insignificant	Emissions of NO ₂ have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation. We consider that the emission limits included in the installation permit reflect the BAT for the sector.
Odour management	We have reviewed the odour management plan in accordance with our guidance on odour management. We consider that the odour management plan is satisfactory.
Permit conditions	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. We are satisfied that the operator can accept these wastes for the following reasons: <ul style="list-style-type: none"> • they are suitable for the proposed activities; • the proposed infrastructure is appropriate; • the environmental risk assessment is acceptable. We made these decisions with respect to waste types in accordance with our guidance on Clinical Waste EPR5.07.
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. See Key Issues section.
Emission limits	We have decided that emission limits are required in the permit. See Key Issues section.
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. These monitoring requirements have been imposed in order to comply with the requirements of our guidance on Clinical Waste EPR5.07. This guidance specifies appropriate standards and measures for assessing the performance

Aspect considered	Decision
	<p>of treatment plants to ensure that the waste is rendered safe. See Key Issues section.</p> <p>We made these decisions in accordance with our guidance on Clinical Waste EPR5.07.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	<p>We have specified reporting in the permit.</p> <p>These reporting requirements have been imposed in order to comply with the requirements of our guidance on Clinical Waste EPR5.07.</p> <p>Reporting of results is required for the monitoring set out above for emission points A1 and S1. In addition the treatment efficacy monitoring and ambient air monitoring is also required.</p> <p>Reporting is required on an annual basis, other than for Treatment efficacy, which is to be agreed as part of pre-operational condition PO2.</p> <p>Standard IED reporting requirements are also imposed for annual treatment and performance parameters (water usage, energy usage, raw material usage).</p> <p>We made these decisions in accordance with our guidance on Clinical Waste EPR5.07.</p>
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Technical competence	<p>Technical competence is required for activities permitted. The operator is a member of an agreed scheme.</p> <p>We are satisfied that the operator is technically competent.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p>

Aspect considered	Decision
	<p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations and our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Shropshire Fire & Rescue Service
Brief summary of issues raised
No issues raised
Summary of actions taken or show how this has been covered
No actions required.

No other comments received.