

Permitting Decisions- Variation

We have decided to grant the variation for Rainham Clinical Treatment Centre operated by Sharpsmart Limited

The variation number is EPR/PP3707BB/V005.

The permit was issued on 26/06/2024

The variation is for:

- Add a second shredder, increasing the shredding capacity to 70 tonnes per day.
- Replace the rotoclaves with single larger autoclave increasing capacity to 70 tonnes per day. The new autoclave will have filtered local exhaust ventilation (LEV) around the loading area.
- Increase capacity of Sharps bin wash plant, repackaging/bulking of emptied sharps to 50 tonnes per day
- Increase in storage capacity of non-hazardous waste to 75 tonnes.

We consider in reaching that decision we have taken all relevant considerations and legal requirements into account 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

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision considerations](#) section to show how the main 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 and the variation notice.

Key issues of the decision

Abatement

The permit was reviewed as part of the healthcare waste permit review, with a varied permit (V004) issued on 14/12/2022, an improvement condition was set requiring a review of abatement for the autoclaves.

Under this variation (V005), the operator is replacing the rotoclaves with a single new autoclave. The new autoclave will have local exhaust ventilation (LEV) that will capture air from around the autoclave doors during loading. This is in line with the Healthcare Waste: Appropriate Measures guidance. The new autoclave will achieve STAATT level III.

The changes at the site will result in the following being abated via HEPA filter and carbon filters and emitted through a combined emission point.

- Autoclave LEV
- Existing and the new shredder
- LEV over the indoor floc compactor unit

The combined emission point is identified on the 'waste storage plan & emission points' plan which was part of this variation application.

Capacity changes

The variation has changed storage and throughputs as follows:

Shredding of infectious waste and thermal treatment via autoclave increased from 20 tonnes per day to 70 tonnes per day.

Sharps bin wash plant, repackaging (bulking) plant increased from 11 tonnes per day to 50 tonnes per day.

Shredded offensive waste and treated autoclave waste (floc) is increasing from 40 to 70 tonnes. The skips will still be sealed and stored in a dedicated area of the external yard.

Total waste throughput has been increased to 60,000 tonnes per year. Comprised of 30,000 tonnes per year for treatment (max of 20,000 tonnes per year hazardous waste), 30,000 tonnes per year for transfer. The hazardous waste storage amount is still limited to 55 tonnes at any one time.

Autoclave condensate that cannot be discharged to sewer is currently stored in IBCs. This will be replaced by a new 12,000 litre bunded tank.

Risk assessment

The operator updated their risk assessment, the key points are summarised below.

- Receipt of waste, storage and repackaging are carried out in the building.
- Point sources are abated with HEPA and carbon filters. The filters are subject to regular maintenance and regularly replaced.
- Storage in line with healthcare waste appropriate measures guidance.
- Noise levels controlled by equipment within fully enclosed building. Plant does not exceed 80dBA 1m from noise source. Our view is that the risk from noise is low, residential receptors are 700m away and the other side of the A13

Odour

The odour management plan was updated to include the plant changes.

Decision considerations

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

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The comments and our responses are summarised in the [consultation responses](#) section.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- The London Borough of Havering
- Thames Water
- Health & Safety Executive
- UK Health Security Agency
- Director of public Health

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified. The

changes brought in through this variation do not have the potential to increase impacts at any site.

We have not consulted Natural England. The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

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. See key issues section for further details.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit. We updated table S1.2 as a result of this variation.

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 and we approve this plan.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques S1.2.

Emission limits and monitoring

The permit includes emissions limits and monitoring for LEV emissions from the autoclave and shredders. We have updated the permit so that these limits and monitoring apply from the new combined LEV emission point. The key issues section described the combined emission point in more detail.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Growth duty

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 variation.

Paragraph 1.3 of the guidance says:

“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.”

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.

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.

Consultation Responses

The following summarises the responses to consultation with other organisations, 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

No responses were received.

Representations from community and other organisations

Response received from: Cadent Gas

Brief summary of issues raised: The response was about a planning application and related to the location of pipelines.

Summary of actions taken: We replied to Cadent Gas to let them know that our consultation did not relate to a planning application. No further action was required.