

Permitting Decisions- Environment Agency Initiated Variation

We have issued an Environment Agency initiated variation for CP Buildings BCC Waste Transfer Station, Kings Weston Lane, Bristol, Avon, BS11 0YS; operated by Clinipower Avonmouth LLP, following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/FB3506SJ/V004.

We consider in reaching this 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.

Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits.

We have reviewed the permit for this activity and varied the notice to make a number of changes to reflect relevant standards and best practice. These changes principally relate to the implementation of our technical guidance [Healthcare waste: appropriate measures for permitted facilities](#).

In this decision document, we set out the reasoning for the variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator against our technical guidance.

As well as considering the review of the operating techniques used by the operator, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template. We have also updated the waste codes permitted, to include those previously accepted under waste exemptions and regulatory position statements.

Purpose of this document

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

- explains how the Environment Agency initiated variation has been determined;
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account;

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.

Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

On 13 July 2020, Healthcare waste: appropriate measures for permitted facilities guidance was published on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to treat or transfer healthcare waste, providing relevant standards (appropriate measures) for those sites.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 07/12/2021 requiring the operator to provide information to confirm that the operation of their facility meets, or how it will subsequently meet, the standards described in our technical guidance.

The notice required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance

The standards described in our technical guidance are split into 7 chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC – Not Compliant

The Regulation 61 notice also asked the operator to confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016) and whether they had considered how their operations could be affected by climate changes (e.g. through a climate change adaptation plan).

Our assessment of the responses received from the operator medium combustion plant and specified generators and consideration of climate change are also summarised in Table 1.

The Regulation 61 notice response from the Operator was received on 04/07/2022.

We considered that the response did not contain sufficient information for us to commence determination of the permit review and we needed further information to complete the permit review assessment. Note: Only include if an RFI was sent to the operator.

We sent a request for further information (RFI) by email to the operator on the 14/11/2024, 09/06/2025, 22/08/2025, 18/11/2025, and 05/12/2025. We received their response on the 05/12/2024, 07/07/2025, 03/10/2025, 25/11/2025 and 16/12/2025.

These responses are available on our public register.

Table 1 – Summary of our assessment of the operator's Reg 61 response

Appropriate measures	Compliance status	Assessment of the installation's compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
General management appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section.
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section
Waste storage, segregation and handling appropriate measures	CC	The operator confirmed that they currently meet the requirements of all appropriate measures in this section.
Waste treatment appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Treatment activities are currently mothballed, with a pre-operational condition in place (PO2) to allow the recommencement of AR1 treatment activities if approval from the Environment Agency has been given prior.
Emissions control appropriate measures	CC	The operator confirmed that they currently meet the requirements of the appropriate measures in this section
Emissions monitoring and limits appropriate measures	FC	The operator has agreed that they will review the appropriate measures guidance with respect to emissions to water and sewer from when bin washing activities recommence. A pre-operational condition has been included in the permit (PO1).
Process efficiency appropriate measures	N/A	This section is not relevant to waste operations.
Reg 61 requirement		Assessment of response received
Medium combustion plant and specified generators	N/A	
Climate change	The operator confirmed that the site location is currently a low-risk area for flooding from rivers or sea, and mains water is used for site operations and fire prevention. Potential impacts of climate change on permitted processes are routinely monitored. Any further action on climate change adaption measures will be through the management system condition of the varied permit.	
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
Change	Reason for change	
Restricted EWC Waste Codes	We have restricted the permitted waste types accepted at the facility to bring them in line with how we permit these waste types within the healthcare waste sector, and in line with the Healthcare Waste appropriate measures.	

<p>Pre-operational condition for the 'Recommendation of Bin Washing Activities' (PO1)</p>	<p>We have set a pre-operational measure which states the operator must submit a written report to the Environment Agency and must obtain the Environment Agency's written approval to it. In accordance with the Healthcare Waste: appropriate measures for permitted sites guidance, the report must detail:</p> <ul style="list-style-type: none"> • How the bin washing process and associated equipment prevents fugitive emissions to air. • Where the bin washing equipment is located and how it enclosed within a designated area of your site • How the self-contained drainage system is designed to collect and contain all wash waters, including any spray. • How staff are trained to operate and regularly inspect and maintain the bin washing equipment.
<p>Pre-operational condition for the 'Recommendation of AR1 treatment activities and its associated monitoring' (PO2)</p>	<p>We have set a pre-operational measure which states that prior to the recommencement of AR1 treatment activities and its associated monitoring, the operator shall submit a written site commissioning validation report to the Environment Agency for approval, that demonstrates and confirms:</p> <ol style="list-style-type: none"> a. the treatment efficacy of the permitted treatment plant, in accordance with the Waste treatment appropriate measures of technical guidance Healthcare waste: appropriate measures for permitted facilities, dated 8 December 2021; b. the proposals for routine monitoring of treatment efficacy comply with the Waste treatment appropriate measures of technical guidance Healthcare waste: appropriate measures for permitted facilities, dated 8 December 2021; c. the installation's emissions, in accordance with the Emissions monitoring and limits appropriate measures of technical guidance Healthcare waste: appropriate measures for permitted facilities, dated 8 December 2021; and d. the proposals for routine monitoring of emissions comply with the Emissions monitoring an limits appropriate measures of technical guidance Healthcare waste: appropriate measures for permitted facilities, dated 8 December 2021. <p>The treatment efficacy tests must take into account the range of waste types that the plant is permitted to treat. AR1 treatment activities and its associated monitoring shall not be made operational until the Environment Agency has given prior written approval under this condition.</p>