

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2016

Natural UK Ltd

Natural UK Ltd Healthcare Management
Facility

Unit 3

Capel Hendre Industrial Estate

Capel Hendre

Ammanford

Carmarthenshire

SA18 3SJ

Variation application number

EPR/DB3231RX/V007

Permit number

EPR/DB3231RX

Natural UK Ltd Healthcare Management Facility

Introductory note

This introductory note does not form a part of the notice

The following notice gives notice of the variation of an environmental permit.

This variation makes the following amendments to the permit as a result of an application from the operator:

- Adding a waste sterilisation process to treat infectious clinical waste (18 01 03* and 18 02 02*) as well as non-hazardous waste absorbent hygiene products (20 01 99).
- Adding the waste code 19 08 01 (sewage screenings) to the list of permitted wastes.
- Extending the permit boundary.

This variation also implements the following changes as a result of a regulator led variation:

- Adding conditions 2.5 (Improvement Programme), 3.5 (Fire), and Table S1.3 (Improvement programme requirements).

The schedules specify the changes made to the original 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
Permit determined EPR/DB3231RX	17/11/11	Permit granted for SR2008No25 _ 75kte – clinical waste & healthcare waste treatment and transfer station.
Variation application EPR/DB3231RX/V002	06/12/12	Application to vary the permit received from the operator.
Variation application EPR/DB3231RX/V002	10/12/12	Application to vary the permit withdrawn by the operator.
Variation application EPR/DB3231RX/V003	20/02/13	Application to vary the permit received from the operator.
Variation application EPR/DB3231RX/V003	20/02/13	Application to vary the permit returned not duly made.
Permit variation issued EPR/DB3231RX/V004	20/09/13	Varied Tier 3 bespoke clinical waste & healthcare waste treatment and transfer station with treatment permit issued to Natural UK Ltd.
Permit variation issued EPR/DB3231RX/V005	26/09/13	Regulator led variation to add the 10 tonne per day limit for hazardous waste treatment – table S1.1 – and to include additional description of site activities in the permit introductory note.
Permit variation issued EPR/DB3231RX/V006	18/03/20	Regulator led variation to: <ul style="list-style-type: none"> add a single waste code (15 02 02*) into the permitted waste table. This change was required for COVID 19 contingencies. Varied permit issued to Natural UK Ltd.
Application EPR/DB3231RX/V007	Duly made 11/04/22	Application to: <ul style="list-style-type: none"> Adding a waste sterilisation process to treat infectious clinical waste (18 01 03* and 18 02 02*) as well as non-hazardous waste absorbent hygiene products (20 01 99) Adding the waste code 19 08 01 (sewage screenings) to the list of permitted wastes. Extending the permit boundary.
Response to Schedule 5 Notice dated 24/05/22	Received 09/06/22	Confirmation of: <ul style="list-style-type: none"> management measures in place to ensure the processes do not exceed the relevant IED limits. Intention to treat the following waste types in the waste sterilisation process: 20 01 99(1) and 20 01 99 (2)

Response to Schedule 5 Notice dated 24/06/22	Received 030/06/22	Providing: <ul style="list-style-type: none"> • Updated Environmental Management System (NU1000 05.R2). • Indicative Operational Layout (NU1000/06/03 R1) • Updated Part C4 Application Form
Variation determined EPR/DB3231RX	21/07/2022	Varied permit issued.

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2016

The Natural Resources Body for Wales (“Natural Resources Wales”) in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/DB3231RX

issued to:

Natural UK Ltd (“the operator”)

whose registered office is

Unit 3 Capel Hendre Industrial Estate

Capel Hendre

Ammanford

Carmarthenshire

SA18 3SJ

company registration number 04722956

to operate a regulated facility at

Natural UK Ltd Healthcare Management Facility

Unit 3 Capel Hendre Industrial Estate

Capel Hendre

Ammanford

Carmarthenshire

SA18 3SJ

to the extent set out in the schedules.

The notice shall take effect from 21/07/2022

Name	Date
Huw Davies	21/07/2022

Authorised on behalf of Natural Resources Wales

Schedule 1 – conditions to be deleted

None

Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator

Table S1.1 as referred to by conditions 2.1 and condition 2.4.2 has been amended and now reads as follows:

Table S1.1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A1 - Clinical waste transfer station with treatment	D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	All storage and treatment activities shall take place within a building on an impermeable surface with sealed drainage. This is limited to being undertaken in areas C, D, E, F, G and 1 of the onsite building as per drawing: NU1000/06/03 as listed in Table S1.2.
	D14: Repackaging prior to submission to any of the operations numbered D01 to D13.	Treatment operations shall be limited to manual and/or mechanical: <ul style="list-style-type: none">- sorting- washing- separation- screening- baling- shredding of permitted wastes for the purposes of recovery or disposal.
	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).	Mechanical treatment may include the use of bespoke equipment to wash and shred waste to aid physical separation and recovery.
	D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12.	Treatment of permitted waste under activity R3 (using wash plant) shall be limited to the treatment of waste types 18 01 04 and 20 01 99 only.
	R3: Recycling/ reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes).	The following waste types 18 01 03*, 18 02 02* and 20 01 99 are permitted to be treated via sterilisation (microwave and / or steam sterilisation). The following waste types accepted under EWC codes 18 01 03*, 18 02 02 and 20 01 99(1) are specifically excluded from all waste treatment activities: <ul style="list-style-type: none">(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); and(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 sources, and, any potentially infected waste from pathology departments and other clinical or research laboratories (Unless autoclaved before leaving the site of

R5: Recycling/
reclamation of other
inorganic materials.

production).

Pre-treatment of waste for incineration or co-incineration shall not exceed 75 tonnes per day under the R3 and/or R5 activities.

Pre-treatment of waste for incineration or co-incineration for disposal shall not exceed 50 tonnes per day under the D9 activity.

The maximum quantity of hazardous waste received, treated or repackaged for disposal shall not exceed, individually or aggregated, 10 tonnes per day.

No more than 50 tonnes of hazardous waste shall be stored at the site at any one time for recovery and/or disposal.

Waste types as specified in Table S2.1.

Table S1.2 as referred to by condition 2.3.1 has been amended and now reads as follows:

Table S1.2 Operating techniques

Description	Parts	Date Received
Technical Guidance Note: How to comply with your environmental permit.	All.	n/a
EPR 5.07, Additional guidance for: Clinical waste (Version 1.1 January 2011), based on EU BAT Reference (BREF) Notes for Waste Treatment Industries and Waste Incineration.	All.	n/a
Sector Technical Guidance Note: Sector Guidance IPPC S5.06 - Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste.	All.	n/a
Application	NATUKLTD - ACC PREP PLAN – 003 JH Odour Management – All parts.	24/05/13
Email (dated 09/06/22) entitled ' <i>RE: PAN 015849 – Schedule 5 Notice</i> ' from Rhiannon Chapple of the Sirius Group in response the Schedule 5 Notice issued 24/05/22	Response to Question 1 which outlines the management strategies implemented on site to ensure the IED threshold limits are not exceeded.	09/06/22
Response to Schedule 5 Notice (dated: 24/06/2022) received 30/06/2022	<p>Environmental Permit Variation Application Supporting Statement, Document Reference: NU1000/05.R2. June2022.</p> <p>Sections:</p> <ul style="list-style-type: none"> • 2.4 Waste Acceptance Procedure • 2.5 Waste Storage, Handling and Dispatch. • 2.6 Point Source Emissions to Air • Appendix 15: EMS 02 Waste Pre-Acceptance Procedures V1 29/10/20 • Appendix 16: EMS 03 Nappicycle Process Absorbent Hygiene Product (AHP) Waste – Waste Acceptance Procedures. V1, 29/10/20. • Appendix 17: EMS 04 Clinical Waste Transfer Station (CWTS) Waste acceptance & Transfer Procedure. V1, 29/10/2020. • Appendix 18: EMS 10 Nappicycle Process Sampling & Testing Procedures 	30/06/22

	Indicative Operational Layout; Drawing Number: NU1000/06/03, Revision 1, Dated 18/02/2021.	30/06/22
	All	
Fire prevention and mitigation plan guidance - Waste Management	All relevant sections	N/A
Fire prevention and mitigation plan	All relevant sections	In line with IPC 1

Table S2.1 as referred to by condition 2.3.2 has been amended and now reads as follows:

Table S2.1 Permitted waste types and quantities for clinical waste transfer station with treatment	
Maximum quantity	The maximum quantity of waste to be accepted at the site shall not exceed 40,040 tonnes per annum.
Exclusions	Notwithstanding the Waste types permitted, wastes which have any of the following characteristics shall not be accepted: <ul style="list-style-type: none"> - hazardous waste - wastes which are odour producing or likely to be odorous - wastes in liquid form
Waste code	Description
09	WASTES FROM THE PHOTOGRAPHIC INDUSTRY
09 01	Wastes from the photographic industry
09 01 01*	water-based developer and activator solutions ¹
09 01 02*	water-based offset plate developer solutions ¹
09 01 03*	solvent based developer solutions ¹
09 01 04*	fixer solutions ¹
09 01 05*	bleach and bleach fixer solutions ¹
09 01 07	photographic film and paper containing silver or silver compounds ¹
09 01 08	photographic film and paper free of silver or silver compounds ¹
¹ Waste accepted under this EWC is limited to wastes of this type arising from medical practices or associated research activities.	
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 02	Absorbents, filter materials, wiping cloths and protective clothing
15 02 02*	Absorbents, filter material (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances (infectious only)
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	sharp (except 18 01 03)
18 01 02	body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection.
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers). (This is limited to non-clinical human offensive/hygiene waste and autoclaved waste from laboratories only)

18 01 06*	chemicals consisting of or containing dangerous substances (excluding X-ray photochemicals)
18 01 07	chemicals other than those mentioned in 18 01 06 (excluding X-ray photochemicals)
18 01 08*	cytotoxic and cytostatic medicines
18 01 09	medicines other than those mentioned in 18 01 08
18 01 10*	amalgam waste from dental care
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01	sharps (except 18 02 02)
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection. (consisting of non-clinical animal offensive/hygiene waste and autoclaved waste from laboratories only)
18 02 05*	chemicals consisting of or containing dangerous substances (excluding X-ray photochemicals)
18 02 06	chemicals other than those mentioned in 18 02 05 (excluding X-ray photochemicals)
18 02 07*	cytotoxic and cytostatic medicines
18 02 08	medicines other than those mentioned in 18 02 07
19	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 08	wastes from waste water treatment plants not otherwise specified
19 08 01	sewage screenings
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
20 01 32	medicines other than those mentioned in 20 01 31
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 dental care, diagnosis, treatment or prevention of disease) which is subject to special requirements in order to prevent infection)
20 01 99(2)	other fractions not otherwise specified (comprising only of non-clinical human and animal offensive/hygiene waste (not arising from healthcare and/or related research i.e. not including waste from dental care, diagnosis, treatment or prevention of disease) which is not subject to special requirements in order to prevent infection)

Schedule 2 – conditions to be added

The following conditions are added as a result of a Natural Resources Wales led variation:

2.5 Improvement programme

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

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IPC1	The operator shall submit a written Fire prevention and mitigation plan to Natural Resources Wales. The Fire prevention and mitigation plan must be produced in line with the standards set out in Fire prevention and mitigation plan guidance – Waste.	3 months after permit issue of EPR/DB3231RX/V007 or otherwise agreed in writing with Natural Resources Wales

3.5 Fire

- 3.5.1 The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention and mitigation plan guidance.
- 3.5.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities could cause a fire risk, submit to Natural Resources Wales a fire prevention and mitigation plan which identifies and minimises the risks of fire;
 - (b) Operate the activity in accordance with the fire prevention and mitigation plan, from the date of submission, unless otherwise agreed in writing by Natural Resources Wales.

Schedule 4 – amended plan

Amended plan attached



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