

Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2010

Personnel Hygiene Services Limited

PHS North Wales
Plot B
Pinfold Lane
Catheralls Industrial Estate
Buckley
Flintshire
CH7 3PS

Variation application number
EPR/KP3294FW/V009

Permit number
EPR/KP3294FW

PHS North Wales

Permit number EPR/KP3294FW

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 is a normal (non-consolidating) variation to a Tier 3 bespoke clinical waste transfer and treatment activity.

The variation allows for the compaction of already permitted human hygiene and healthcare wastes to take place on site. All compaction must take place in suitable, low pressure, sealed compaction units referred to as roll-on-roll-off (Ro-Ro) compactors. The compactors must be operated on impermeable surface with sealed drainage to foul sewer – as per current permit conditions.

The compactors may be operated outside the building, providing approved measures – as incorporated in table 1.2 of the amended permit - are in place. The variation also allows the compactors to be operated inside the building should future operations allow room for this.

Clinical waste cannot be compacted. Measures specified by the operator to ensure clinical waste does not enter the compactor, have been incorporated into the permit – table 1.2. The activity must be operated in line with the measures.

Relevant conditions in the existing permit have been amended to reflect the new treatment process. Standard environmental permitting (modern) conditions to control potential ‘fugitive’ aerial emissions and noise from the new process have been added to address the risks inherent to the new process.

The variation has also added the ability for waste to be treated for the purpose of recovery (elsewhere), as well as disposal.

There has not been any change to the permitted waste types or annual throughput quantities.

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
Licence issued (reference 172/92)	13/12/93	Original waste disposal licence for a clinical waste transfer station issued to Personnel Hygiene Services Limited.
Modification determined	13/12/93	
Modification determined	24/10/94	
Modification determined	17/02/98	Conditions regarding notifications and special waste added.
Modification determined	21/05/99	Condition requiring provisions of waste returns added.
Modification determined	17/04/02	All previous conditions deleted and replaced with new, modern permit.
Modification determined	24/04/02	All previous conditions deleted and replaced with new, modern permit.
Modification determined	08/12/03	Removal of condition requiring financial provision to be maintained.
Variation application EPR/KP3294FW/V009 (formerly EAWML 37087)	Duly made 30/09/13	Application to vary the permit to allow compaction of human hygiene and healthcare wastes using a roll-on-roll-off (Ro-Ro) compactor.
Additional information in response to Schedule 5 notice sent on 21/11/13	06/12/13	Information consisting of: site specific environmental risk assessment, updated sections of the 'shell working plan' and measures to show only suitable waste enters the compactor.
Additional information in response to Schedule 5 notice sent on 13/12/13	19/12/13	Information consisting of: updated sections of the 'shell working plan' and updated risk assessment.
Response to draft variation notice sent on 14/01/14	14/01/14	Operator request to add the ability to treat for recovery (R3 code) to the permit, as part of the variation application.
Additional information in response to request for information sent by email on 17/01/14	24/01/14	Information relating to noise control measures to be used on site.
Variation determined EPR/KP3294FW	20/02/14	Varied permit to allow compaction of specified waste and treatment of waste for recovery (elsewhere) issued.

End of introductory note

Notice of variation

Environmental Permitting (England and Wales) Regulations 2010

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 2010 varies

Permit number
EPR/KP3294FW

issued to:
Personnel Hygiene Services Limited (“the operator”)

whose registered office is
c/o c/o PHS Group Plc
Block B
Western Industrial Estate
Lon-y-Llyn
Caerphilly
Mid Glamorgan
CF83 1XH

company registration number **00770813**

to operate a regulated facility at
Plot B
Pinfold Lane
Catheralls Industrial Estate
Buckley
Flintshire
CH7 3PS

to the extent set out in the schedules.

The notice shall take effect from 20/02/2014.

Name	Date
Holly Noble	20/02/14

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:

Condition 1.1.1 Specified waste management operations, in the ‘General considerations’ section

1.1 Specified waste management operations

1.1.1 No waste management operations shall be authorised by this licence unless:

- a. specified in and undertaken in accordance with the limitations in sections WP 1.5, 1.6, 8.7 - 8.9, 9.1 - 9.6, 9.12 - 9.15 , Appendix E of the working plan, table 1.1 and table 1.2; or
- b. otherwise required by the conditions of this licence as being an integral part of those operations, and
- c. if notified by Natural Resources Wales that the activities are giving rise to pollution, the operator shall submit to Natural Resources Wales for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in table 1.2 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 Natural Resources Wales.

Table 1.1 ‘Specified waste management operations’, in the ‘General considerations’ section

Table 1.1 Specified waste management operations		
Specified Waste Management Operation	Permitted Waste Types which may be subject to the Specified Operation	Limits on Specified Waste Management Operations
Storage pending disposal or recovery. <i>(This may include physical mixing of waste from different containers of the same type of waste where appropriate.)</i>	All	Maximum storage capacity for the specified activities shall be in accordance with those shown in Appendix B of the working plan. The specified operations can only take place within areas of impermeable pavement with sealed drainage provided in accordance with condition 2.1.2.
R13 - Storage of wastes pending any of the operations numbered R01 to R12 (excluding temporary storage pending collection on the site		Maximum storage times for the keeping of waste shall be in accordance with those shown in condition 4.6 and Table 4.6a.

Table continued overleaf

where it is produced).

D15 - Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced).

All containers used to store waste outside the building shall be fully sealed to prevent ingress or egress of liquid.

Treatment of waste	Low risk healthcare waste also known as group E clinical waste and non clinical human hygiene waste.	Treatment consisting only of:
D14 - Repackaging prior to submission to any of the operations numbered D01 to D13		<ul style="list-style-type: none"> Physical mixing of waste from different containers of the same type of waste Low pressure compaction in a suitable, well maintained roll-on-roll-off (Ro-Ro) compactor which prevents, or where not possible, minimises emissions to air
D09 - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12		<p>There shall be no compaction of clinical wastes.</p> <p>Roll-on-roll-off (Ro-Ro) compactors shall be considered 'mobile containers' and subject to all relevant standards for mobile containers as set out in this permit.</p>
R03 - Recycling/ reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)		<p>All repackaging must take place within a building.</p> <p>Compaction may take place within the building or outside in the yard area.</p> <p>The specified treatment operations can only take place on an area of impermeable pavement with sealed drainage provided in accordance with condition 2.1.2.</p> <p>The physico-chemical treatment of non-hazardous waste for the purpose of disposal (D9) at the site shall be limited to 50 tonnes per day in total.</p>

Condition 2.1.3, Table 2.1 Site containment and drainage standards

Table 2.1 Site containment and drainage standards

Type of Site Surface and Drainage	Minimum Specified Standards of Design, construction and Maintenance
a) Impermeable pavement, building and sills	<ul style="list-style-type: none"> i) Areas of impermeable pavement, bunding and sills shall be constructed and maintained so as to prevent fluids running off the pavement and the transmission of fluids through the pavement or joints. ii) Surfaces where healthcare waste is stored, handled or treated should be constructed in order that they are durable, smooth, impermeable and washable.
b) Sealed drainage systems	i) Drainage to areas of impermeable pavement shall be provided by discharge to foul sewer unless otherwise agreed in writing with

c) Covered buildings or roofed areas	i) All buildings shall be designed, constructed and maintained to prevent ingress of rain and surface water.
d) Storage skips, drums, compactors (roll-on roll-off) and other mobile tanks and containers	i) All skips, drums, compactors (roll-on roll-off) and other mobile tanks and containers which are used for the storage and treatment of wastes shall be constructed and maintained so that they do not leak any liquids contained in them.

Condition 1.3.1, Table 1.3 Conditions for which changes to the working plan require prior written consent of Natural Resources Wales

Table 1.3 Conditions for which changes to the working plan require prior written consent of Natural Resources Wales		
Condition	Subject	Working plan section or document reference
1.1	Specified waste management operations	Working Plan: 1.5, 1.6, 8.7, 8.8, 8.9, 8.10, 9.1-9.6, 9.12-9.15 and Appendix E Incorporated management/process documents: - Q1 – Site Specific Risk Assessment: Table 2 – Site Specific Screening Risk Assessment - Responses and referenced site plan submitted by email on 24/01/14 as set out in table 1.2
1.2	Permitted wastes	Appendix B of Working plan.

Condition 4.7.1 of section 4.7 ‘Treatment process’

47.1 Any treatment of waste on site shall be limited to simple physical treatment for bulking up purposes only and be carried out on the site in accordance with sections 9.2 – 9.6 and 9.12 – 9.14 of the working plan.

Schedule 3 – conditions to be added

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

Table 1.2 Operating techniques, is added to section 1 ‘General considerations’ (as referenced in amended condition 1.1.1)

Table 1.2 Operating techniques		
Description	Parts	Date Received
Guidance note ‘How to comply with your environmental permit’ (version 6)	All relevant parts as set out in the document	N/A
How to comply with your environmental permit - Additional guidance for: Clinical waste (EPR 5.07) (version 1.1)	All relevant parts, as set out in the document	N/A

Table 1.2 Operating techniques		
Description	Parts	Date Received
Department of Health Technical Memorandum 07-01: Safe management of healthcare waste (published 20 March 2013)	All relevant parts, as set out in the document	N/A
Information submitted in response to Schedule 5 information notice dated 13/12/2013	Q1 – Site Specific Risk Assessment - Table 2 – Site Specific Screening Risk Assessment	19/12/13
Information submitted in response to request for information sent by email on 17/01/2014	Email containing responses to queries made: - 1) The addition of the R3 code - 2)(i) actual hours during which the compactors will be used - 2)(ii) frequency with which the compaction mechanism itself is used - 2)(iii) will there be a need for successive/multiple compaction actions? - 2)(iv) will there be multiple compactors on site? - 2)(v) location of the compactor – including referenced plan 'Buckley Site Plan NW.pdf' - 2)(vi) contingencies for not being able to compact - 2)(vii) what measures will you use to ensure your measures work, to review measures if they're no longer suitable and to deal with complaints: the details relating to dealing with complaints only	24/01/14

New Condition 1.11 added to section 6 'General considerations'

1.11 Improvement programme

1.11.1 The operator shall complete the improvements specified in table 1.4 by the date specified in that table unless otherwise agreed in writing by Natural Resources Wales.

1.11.2 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 1.4 Improvement programme requirements		
Reference	Requirement	Date
IP1	The operator shall submit written details of monitoring to be carried out in order to demonstrate that management processes, techniques and abatement measures in place at the site to control noise are effective, and appropriate. The monitoring plan must, at a minimum, consider all relevant techniques, issues and methods set out in horizontal guidance note 'H3 Noise', and specify when the monitoring will be carried out and any subsequent measures that may be taken once results are obtained.	20/05/14 or as otherwise agreed in writing with Natural Resources Wales

Table 1.4 Improvement programme requirements

Reference	Requirement	Date
IP2	The operator shall update their management system (working plan or any other relevant document) to detail how maintenance of the 'Ro-Ro' compactors will be undertaken, and shall submit the updated information in writing to Natural Resources Wales.	20/05/14 or as otherwise agreed in writing with Natural Resources Wales

New Condition 6.4 added to section 6 'Amenity management and reporting'**6.4 Emissions of substances not controlled by emission limits**

6.4.1 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.

6.4.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales 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 Natural Resources Wales.

New Condition 6.5 added to section 6 'Amenity management and reporting'**6.5 Noise and vibration**

6.5.1 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 Natural Resources Wales, 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.

6.5.2 The operator shall:

- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales 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 Natural Resources Wales.

Addition to section 8 ‘Interpretation’

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“low pressure compaction” means a compaction system with a manufactured capability of exerting a pressure no greater than 30 tonnes.