

C.2.01. - Appendix one**Purpose of Modification**

Personnel Hygiene Services Ltd (PHS), currently hold a waste management licence, EAWML30052 licence ref. 91/08 [mod 2], for a clinical and healthcare waste transfer station at Unit 49, Portmanmoor Road Industrial Estate, Cardiff, as shown in red on drawing 1. This site has also been used for non-waste management activities operated by PHS, such as the storage of washroom supplies and facility management supplies. PHS have recently reorganised their operations in the Cardiff area, and as a consequence, have sold the site in its entirety. As part of the sale, PHS, have leased back one of the two buildings, along with the associated yard and access road, delineated in green on drawing number 2. This area is referred to as area 'A' within this modification and in the submitted working plan. Area 'B' is the remaining area subject to the conditions of the waste management licence, which is no longer owned by PHS, nor is it under their control.

As area 'B' is no longer under the direct control of PHS, and because it is not possible to partially surrender a waste management licence (at the present, although this will be possible under the new Environmental Permitting Regulations), we wish to modify the existing waste management licence, so that the current conditions apply only to activities within area 'A'. Area 'B' will be deconditioned, which means that whilst still being covered by the waste management licence, it may not be used for waste management activities.

In addition to this division of the waste management licensed area into two parts, PHS are also applying for a paragraph 50 exemption within area A for the storage of WEEE on site prior to its recovery or repair elsewhere. These operations will primarily be the collection of non-working items from washroom servicing and the storage of fluorescent tubes and lights. All materials stored under the exemption will be visually different from those stored under the waste management licence, due to their nature and as such will not require separate labelling whilst on site. All storage will be in accordance with the requirements of the exemption.

Incidental Modification.

There is an additional waste management activity listed in this modification application, which is D14 'repackaging prior to submission of any of the operations number D1 to D13'. This activity has previously not been separately identified on the waste management licence. However, the previously agreed working plan (dated September 2001), clearly shows this activity taking place on site in section 1.3, 2.11, 6.7, and 9.2 - 9.5. It is also covered in table 1.1 of the waste management licence, where it states 'this may include physical mixing of wastes from different containers of the same type of waste where appropriate'. This activity is listed within the fixed licence conditions for a clinical waste transfer station and is not deemed as a treatment process. This is not a new activity, merely an identification of an existing activity on the site. As such there is no increased risk of harm to human health or the environment, nor is there any increase in either WAMITAB requirements, or subsistence fee.

Modification Details

Drawing 2 clearly shows the boundary of the two areas within the waste management licence. Area A is now enclosed within a separate fence and has its own security gate as illustrated in drawing 3, which also shows the area drainage layout. This means that the changes have led to an increase in security for area A. Site access is still from the same location on the industrial estate. The installation of this new fence and gate will necessitate the moving of the site identification board, to the fence adjacent to the new security gate.

The current waste management licence is in a generic format, agreed in 2002 with the Environment Agency, which applies to all of the facilities PHS operates under waste management licensing. This licence was used as the template for the shell waste management licence for clinical waste transfer stations by the EA. With the replacement of the shell waste management licences, it may be advantageous to change this existing format into that given in the fixed waste management licence, although the site is not eligible to be a fixed licence, due to the presence of two areas of the site one a waste management area and an area where no such activities may take place.

There are also additional wastes on the current waste management licence list of acceptable wastes, which are not in the fixed licence. These relate to pest control, carried out as part of the company's other facility management activities. One new waste code has also been added to the list of acceptable waste under the terms of the waste management licence. This relates to photochemicals, primarily originating from x-ray development at dental surgeries. As such this waste stream may be classified as clinical type wastes, although the waste code is from chapter 20 of the EWC. Other additional EWC codes are covered by the paragraph 50 exemption applied for. The addition of this one waste type to the list of acceptable wastes does

not affect the overall tonnages allowed under the licence. Nor does it increase the range of hazards present on site, due to pharmaceutical wastes with similar properties already being present on site.

Working Plan

The current working plan for the facility was agreed with the Environment Agency in 2001. There have been a number of legislative and operational changes since this date, so as part of the modification of the waste management licence; a revised working plan has been submitted. The legislative changes include the hazardous waste regulations and PPC regulations. This working plan is based on a generic template used by PHS at all 21 of their transfer stations in England and Wales. Hence much of the site specific information is located in appendices.

There are a number of changes to the wording of this document, including references to the paragraph 50 exemption and appendix B has been extensively reworked. The document now covers both areas A and B separately due to the differing nature of the operations in these two areas. Although the waste types handled at the site have remained largely unchanged, there are now daily limits set on quantities, separated into hazardous and non-hazardous wastes, to ensure the site falls outside the PPC regime. The daily limit for wastes destined for disposal are hazardous wastes 9.9 tonnes and non-hazardous 49.9 tonnes. In addition there may be further wastes stored for recovery or recycling off-site under the waste management licence. The overall annual tonnage of 4 999 tonnes remains the same as at present, whether the waste is destined for disposal or recovery.

Financial Provision

Because there is no increase in obligations due to the waste quantities remaining the same and only a minor change in waste types, there is no need to provide financial provision for this modification.

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