

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Tradebe Healthcare National Limited

**Wrexham Clinical Waste Treatment
Facility (HDU & TS)
Marlborough Road
Wrexham Industrial Estate
Wrexham
LL13 9RJ**

Variation number

EPR/WP3636ZG/V005

Permit number

EPR/WP3636ZG

Wrexham Clinical Waste Treatment Facility (HDU & TS)

Permit number EPR/WP3636ZG

Introductory note

This introductory note does not form a part of the notice.

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

This is a permit variation following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) Waste Treatment. The associated BAT conclusions to this document were published on the 17th August 2018 in the Official Journal of the European Union.

This variation incorporates the changes required by the Industrial Emissions Directive following a statutory review of permits in the Waste Treatment sector. These include the amendment of the wording of several permit conditions relating to notifications, changes to emission limits and monitoring requirements. The interpretation section of the permit has also been updated and the opportunity has been taken to consolidate the original permit and subsequent variations.

We are satisfied that the operator will be compliant with the published BAT conclusions which will apply from 17th August 2022.

The rest of the installation is unchanged and continues to be operated as follows:

The installation accepts hazardous and non-hazardous waste which consist mainly of clinical wastes. The Operator either treats the waste in a Heat Disinfecting Unit (HDU) or transfers it to a suitably permitted facility.

The HDU consists of a shredder, a waste treatment chamber and abatement equipment. The waste is shredded under negative pressure to prevent the release of dust, odours and pathogens. The collected gases are passed through a three-stage HEPA filter before being released to the atmosphere. The shredded material is heated in the treatment chamber and the off-gases, including water vapour, are cooled in a condenser. Condensed water is discharged to foul sewer and the gases are passed through a scrubber and biofilters to abate odours before being released to the atmosphere.

The schedules specify the changes made to the permit. Schedule 1 of the notice specifies the conditions that have been varied and Schedule 2 comprises a consolidated permit which reflects the changes being made.

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
Application RP3237SZ (EPR/RP3237SZ/A001)	Duly Made 31/08/05	
Additional Information Schedule 4 notice	03/03/06	20/03/06, 28/03/06, 31/03/06 and 11/04/06
Request to extend determination period	02/03/06	10/03/06
Permit determined RP3237SZ (EPR/RP3237SZ/A001)	23/06/06	
Variation application EPR/RP3237SZ/V002	Received 23/05/11	Withdrawn 31/05/11
Variation application EPR/RP3237SZ/V003	Duly Made 07/06/11	Variation and Consolidation with EAWML 37223
Variation determined EPR/RP3237SZ/V003 (varied and consolidated permit issued)	27/10/11	
Application EPR/UP3137FB/T001 (full transfer of permit) EPR/RP3237SZ	Received 02/11/11	Application to transfer the permit in full to SITA UK Limited.
Transfer determined EPR/UP3137FB	4/11/11	Full transfer of permit complete.
Application EPR/WP3636ZG/T001 (full transfer of permit EPR/UP3137FB)	Duly Made 04/02/13	Application to transfer the permit in full to Polkacrest Limited.
Transfer determined EPR/WP3636ZG/T001	04/03/13	Full transfer of permit complete.
Agency variation determined EPR/WP3636ZG/V002	25/03/13	Agency variation to implement the changes introduced by IED
Notified of change of company name	17/12/14	Name changed to Tradebe Healthcare National Limited
Variation issued EPR/WP3636ZG/V003	14/01/14	Varied permit issued to Tradebe Healthcare National Limited
NRW initiated variation issued EPR/WP3636ZG/V004	19/03/20	NRW initiated variation to include a single waste code 15 02 02*

Regulation 61 Notice sent to the Operator	05/04/19	Issue of a Notice under Regulation 61(1) of the EPR. Natural Resources Wales initiated review and variation to vary the permit following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment.
Regulation 61 Notice response	03/12/19	Response received from the operator.
Additional information received	20/08/20	
Variation determined EPR/WP3636ZG/V005	28/06/21	

End of introductory note

Notice of variation and consolidation

The 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 and consolidates

Permit number
EPR/WP3636ZG

issued to

Tradebe Healthcare National Limited (“the operator”)

whose registered office is

**Atlas House Third Avenue
Globe Park
Marlow
Buckinghamshire
SL7 1EY**

company registration number 03882534

to operate an installation at

**Wrexham Clinical Waste Treatment Facility (HDU & TS)
Marlborough Road
Wrexham Industrial Estate
Wrexham
LL13 9RJ**

to the extent set out in the schedules.

The notice shall take effect from 28/06/21

Signed

Date

Holly Noble	28/06/2021
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Authorised on behalf of Natural Resources Wales

Schedule 1

All conditions have been varied by the consolidated permit as a result of a Natural Resources Wales initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Tradebe Healthcare National Limited

**Wrexham Clinical Waste Treatment
Facility (HDU & TS)
Marlborough Road
Wrexham Industrial Estate
Wrexham
LL13 9RJ**

Permit number

EPR/WP3636ZG

Wrexham Clinical Waste Treatment Facility (HDU & TS)

Permit number **EPR/WP3636ZG**

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The installation accepts hazardous and non-hazardous waste which consist mainly of clinical wastes. The Operator either treats the waste in a Heat Disinfecting Unit (HDU) or transfers it to a suitably permitted facility.

The HDU consists of a shredder, a waste treatment chamber and abatement equipment. The waste is shred under negative pressure to prevent the release of dust, odours and pathogens. The collected gases are passed through a three-stage HEPA filter before being released to the atmosphere. The shredded material is heated in the treatment chamber and the off-gases, including water vapour, are cooled in a condenser. Condensed water is discharged to foul sewer and the gases are passed through a scrubber and biofilters to abate odours before being released to the atmosphere.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
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Application RP3237SZ (EPR/RP3237SZ/A001)	Duly Made 31/08/05	
Additional Information Schedule 4 notice	03/03/06	20/03/06, 28/03/06, 31/03/06 and 11/04/06
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Status log of the permit

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Transfer determined EPR/UP3137FB	4/11/11	Full transfer of permit complete.
Application EPR/WP3636ZG/T001 (full transfer of permit EPR/UP3137FB)	Duly Made 04/02/13	Application to transfer the permit in full to Polkacrest Limited.
Transfer determined EPR/WP3636ZG/T001	04/03/13	Full transfer of permit complete.
Agency variation determined EPR/WP3636ZG/V002	25/03/13	Agency variation to implement the changes introduced by IED
Notified of change of company name	17/12/14	Name changed to Tradebe Healthcare National Limited
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NRW initiated variation issued EPR/WP3636ZG/V004	19/03/20	NRW initiated variation to include a single waste code 15 02 02*
Regulation 61 Notice sent to the Operator	05/04/19	Issue of a Notice under Regulation 61(1) of the EPR. Natural Resources Wales initiated review and variation to vary the permit following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment.
Regulation 61 (1) Notice response	03/12/19	Response received from the operator.
Additional information received	20/08/20	Information received for Items 6 and 7 of the Regulation 61 (1) Notice and further details on items such as the installations Environmental Management System.
Natural Resources Wales variation determined EPR/WP3636ZG/V005	28/06/21	Updated and consolidated permit issued to Tradebe Healthcare National Limited.

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number
EPR/WP3636ZG

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/WP3636ZG/V005 authorising,

Tradebe Healthcare National Limited (“the operator”),
whose registered office is

**Atlas House Third Avenue
Globe Park
Marlow
Buckinghamshire
SL7 1EY**

company registration number 03882534

to operate an installation waste operations at

**Wrexham Clinical Waste Treatment Facility (HDU & TS)
Marlborough Road
Wrexham Industrial Estate
Wrexham
LL13 9RJ**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Holly Noble	28/06/2021

Authorised on behalf of Natural Resources Wales

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

1.2.1 For the following activities referenced in schedule 1, table S1.1 (A1 and A2). The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 For the following activities referenced in schedule 1, table S1.1 (A1 and A2). The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 For the following activities referenced in schedule 1, table S1.1 (A1 and A2). Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 (a) For the following activities referenced in schedule 1, table S1.1 (A1 and A2). The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by Natural Resources Wales.
- (b) 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 schedule 1, table S1.2 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.
- 2.3.2 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.3 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table(s) S2.2 and S2.3; and

- (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
 - (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Technical requirements

Hazardous waste storage and treatment

- 2.4.1 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

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.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 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.
- 3.2.2 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.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour 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 odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to odour, submit to Natural Resources Wales for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by Natural Resources Wales.

3.4 Noise and vibration

- 3.4.1 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.
- 3.4.2 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.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by Natural Resources Wales, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1, S3.2 and S3.3;
 - (b) process monitoring specified in table S3.4.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by Natural Resources Wales.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by Natural Resources Wales.

3.6 Pests

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by Natural Resources Wales, submit to Natural Resources Wales for approval within the period specified, a pest's management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
 - (b) implement the pest's management plan, from the date of approval, unless otherwise agreed in writing by Natural resources Wales

3.7 Fire

- 3.7.1 The operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention plan guidance.
- 3.7.2 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 plan which identifies and minimises the risks of fire;
 - (b) Operate the activity in accordance with the fire prevention plan, from the date of submission, unless otherwise agreed in writing by Natural Resources Wales.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by Natural Resources Wales, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by Natural Resources Wales.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to Natural Resources Wales using the contact details supplied in writing by Natural Resources Wales.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (A1 and A2). A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production / treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by Natural Resources Wales, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to Natural Resources Wales, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 For the following activities referenced in schedule 1, table S1.1, A1 and A2. Within 1 month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

- 4.3.1 For the following activities referenced in schedule 1, table S1.1 (A1 and A2).
- (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform Natural Resources Wales,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) in the event of a breach of any permit condition the operator must immediately—
 - (i) inform Natural Resources Wales, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 For the following activities referenced in schedule 1, table S1.1 (A7) Natural Resources Wales shall be notified without delay following the detection of:
- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
 - (b) the breach of a limit specified in the permit; or
 - (c) any significant adverse environmental effects.
- 4.3.4 Any information provided under condition 4.3.3 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.5 Where Natural Resources Wales has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform Natural Resources Wales when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to Natural Resources Wales at least 14 days before the date the monitoring is to be undertaken.

4.3.6 Natural Resources Wales shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.7 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) Natural Resources Wales shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.8 Natural Resources Wales shall be given at least 14 day's notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
A1	S5.3 A(1)(a)(ii): Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.	D9: Physico-chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by means of any operations numbered D1 to D12 (in the Heat Disinfecting Unit).	Waste types as specified in table S2.2.
A2	S5.3 A(1)(a)(ii): Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.	D15: Storage of hazardous waste.	Waste types as specified in table S2.3.
Directly Associated Activity			
A3	Disposal of non-hazardous waste.	D9: Physico-chemical treatment not specified elsewhere in this Annex which results in final compounds or mixtures which are discarded by means of any operations numbered D1 to D12 (in the Heat Disinfecting Unit).	Waste types as specified in table S2.2.
A4	Disposal of non-hazardous waste.	D15: Storage of non-hazardous waste.	Waste types as specified in table S2.2.
A5	Washing of clinical waste containers.	Washing of containers used for clinical waste storage.	No limit on capacity.
A6	Combustion plant	Gas fired boiler <0.5 MW	From receipt of fuel to emission of combustion gases.
Description of activities for waste operations		Limits of activities	
A7	<p>D15: Temporary storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).</p> <p>R13: Temporary storage of waste pending any other operation (excluding temporary storage, pending collection, on the site where it is produced).</p>	Waste types as specified in tables S2.2 and S2.3.	

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	The response to questions 2.1.4 to 2.1.10, 2.1.12 to 2.1.14, 2.1.17 to 2.1.24 and 2.2 of the application, (excluding answers to question 2.2.9) and excluding attachment 5 parts 8(2) and 9.	31/08/05
Response to Schedule 4 Notice Request dated 03/03/06	Answers to points 5,9-12, 14-27 only.	20/03/06, 28/03/06, 31/03/06, 11/04/06
Email from Stuart Budd, Sterile Technologies, dated 08/12/05	All.	08/12/05
Email from Stuart Budd, Sterile Technologies, dated 25/01/06	Hazardous and non-hazardous waste storage for Wrexham Plant only.	25/01/06
Email from Colm Harkin, Sterile Technologies, dated 15/06/06	Storage quantities for Wrexham facility only and description of wastes to be included.	15/06/06
Response to regulation 61(1) Notice – request for information dated 04/05/2019 detailing how the Operator will comply with the BAT conclusions for Waste Treatment, under Directive 2010/75/EU of the European Parliament and of the Council		03/12/19
Additional information for regulation 61(1) Notice		20/08/20
Fire prevention and mitigation plan guidance – Waste Management	All relevant sections	N/A
Fire prevention and mitigation plan	All relevant sections	In line with IC29

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC1	The Operator shall revise and re-submit the plan which details air emissions to ensure that it has an accurate scale.	Completed
IC2	The Operator shall implement procedures to ensure that waste is stored in bins with closed lids except during loading and unloading. The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedures. Any proposed improvement shall be implemented from the date of approval by the Agency in writing.	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC3	The Operator shall repair the oil leak on the screw conveyor. The Operator shall submit a validation report to the Agency for approval.	Completed
IC4	The Operator shall revise and re-submit the plan which details site drainage to ensure that it has an accurate scale and clearly references all surface water discharge point(s) on site as W1, W2 etc.	Completed
IC5	<p>A written justification for the treatment of non-hazardous waste listed in tables S1.1 and S3.2 of this permit, shall be submitted to the Agency for approval. As a minimum, the justification shall take into account the principles specified in section 2.1.1 of Sector Guidance Note IPPC 5.06 dated December 2004. The justification should address whether the treatment of each non-hazardous waste listed in tables S1.1 and S3.2:</p> <ul style="list-style-type: none"> • Is an efficient use of energy; • Impedes waste recovery or recycling; and • Compromises the treatment of any hazardous waste. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the justification.</p> <p>Following review of the justification by the Agency, only those non-hazardous wastes approved shall be accepted for treatment at the installation.</p>	Completed
IC6	<p>A written plant efficacy testing procedure shall be submitted to the Agency for approval. As a minimum the procedure shall include:</p> <ul style="list-style-type: none"> • The frequency of sampling; • Minimum number of spore strips or sub-samples to be used; • Number of control strips; • Details of the indicator strips and/or multipoint data loggers to be used; • The quantitative and qualitative success criteria; and • An action plan that details actions to be taken if the success criteria are exceeded. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The efficacy testing procedure shall be implemented from the date of approval by the Agency in writing. Until such time that the written procedure for efficacy testing is approved by the Agency, the minimum frequency for efficacy testing to demonstrate microbial inactivation shall be weekly.</p>	Completed
IC7	<p>The Operator shall review the storage of waste and the site surfacing at the facility in accordance with section 2.1.3 of Sector Guidance Note IPPC S5.06, dated December 2004. Once the review has been conducted the Operator shall submit their findings to the Agency in writing and a timetable of remediation works if required.</p> <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the review.</p> <p>Any proposed improvements shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC8	<p>The Operator shall review the bunding at the facility in the vicinity of the scrubbing tower and the oil storage facility in zone 12 and ensure that it meets the requirements of section 2.2.5 of the Agency Sector Guidance Note, dated December 2004.</p> <p>The Operator shall submit a written timetable of repairs to be undertaken to the Agency for approval.</p>	Completed
IC9	<p>The Operator shall develop a written Site Closure Plan with regard to the requirements set out in section 2.11 of Sector Guidance Note IPPC S5.06, dated December 2004. Upon completion of the plan, a summary of the documents shall be submitted to the Agency for approval in writing.</p>	Completed
IC10	<p>A written assessment of the Volatile Organic Compounds (VOCs) emitted from the process shall be submitted to the Agency. The written assessment shall include, but need not be restricted to:</p> <ul style="list-style-type: none">• A scale drawing showing location of the emission points monitored;• Sampling of the emission and comparison against the benchmark values listed in section 3.11 of the Sector Guidance Note IPPC S5.06, dated December 2004, to assess their significance;• Proposal of any necessary modelling of the emission; and• Details of how any emissions are to be prevented during the operation of the facility. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the written assessment.</p> <p>The proposals for modelling and emission prevention shall be implemented by the Operator, from the date of approval by the Agency in writing.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC11	<p>A written report considering discharges to sewer shall be submitted to the Agency for approval. The report shall include, but need not be restricted to:</p> <ul style="list-style-type: none"> • The probability of sewer bypass, via storm/emergency overflows or at intermediate sewage pumping stations; • The percentage of the time the Wastewater Treatment Works is bypassed; • An estimate of the increased annual load of metals and persistent substances which will result from bypassing; • A summary of action plans in the event of bypass such as knowing when bypass is occurring, or shutting down, or justification if there is to be no action taken; • Summary of the events that could cause a release which could adversely effect the sewage treatment works and what actions (e.g. holding tanks, monitoring, batch release etc.) and actions taken to prevent this; • Details of the treatment provided at the wastewater treatment works and how this compares to that which would be achieved if the effluent were treated on site, based on reduction of load (not concentrated) of each substance to the receiving water; and • Any improvements identified, where appropriate the report shall contain different dates for implementing different measures. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.</p> <p>Any improvements shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC12	<p>The Operator shall undertake a waste minimisation audit in accordance with section 2.4.2 of the Sector Guidance Note IPPC S5.06, date December 2004.</p> <p>The audit shall be submitted to the Agency in writing with a timetable of improvements to be undertaken, for approval by the Agency.</p>	Completed
IC13	<p>The Operator shall undertake an energy use audit in accordance with section 2.7.2 of the Sector Guidance Note IPPC S5.06, date December 2004.</p> <p>The audit shall be submitted to the Agency in writing with a timetable of improvements to be undertaken, for approval by the Agency.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC14	<p>A written report considering the cleaning and disinfecting of all clinical waste re-usable containers that have been delivered to and emptied at the installation should be provided to the Agency. The report shall include but need not be restricted to:</p> <ul style="list-style-type: none">• The type and frequency of cleaning and disinfecting necessary to prevent fugitive emissions of odour and biological contaminants;• A scale drawing showing location of the cleaning and disinfecting;• Details of the disinfectant to be used, including strength and contact time;• Details of the disposal of wash water or waste arisings; and• Details of how any fugitive emissions are to be prevented during the cleaning and disinfecting activity. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the report.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC15	<p>A written waste pre-acceptance procedure shall be submitted to the Agency for approval. The procedure shall take into account of the principles specified in section 2.1.1 of Sector Guidance Note IPPC S5.06 dated December 2004. As a minimum the procedure shall:</p> <ul style="list-style-type: none">• Ensure that only waste suitable for treatment is accepted for treatment at the installation;• Provide details of the waste producer and process that produce the waste;• Include the quantity and type of each waste; and• Include a reliable audit of the waste, prior to acceptance, at the site that shows that waste has been appropriately segregated and identified. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC16	<p>A written waste acceptance procedure shall be submitted to the Agency for approval. The procedure shall take into account of the principals specified in section 2.1.2 of Sector Guidance Note IPPC S5.06 dated December 2004. As a minimum the procedure shall include:</p> <ul style="list-style-type: none">• A record of the inspection regime for each load and justification for the selection of this option; and• Visual inspection before offloading where safety is not compromised. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC17	<p>A written validation report of the existing plant operation should be provided to the Agency. The report shall include, but need not be restricted to:</p> <ul style="list-style-type: none">• A microbial efficacy analysis, that demonstrates that the choice of test organisms, the method of introduction to the plant, the choice of organism carrier, and the analytical method are adequate to demonstrate STAATT level III criteria for a worst case scenario challenge load;• Evidence that the parametric controls, and procedures for real-time monitoring and assessment of outputs, are in place with respect to any waste treated;• Evidence that the parametric control data relate to microbial destruction efficacy so that waste can therefore be considered to be treated satisfactory on the basis of parametric control alone; and• An environmental monitoring assessment of the site that addresses process emissions; and• An assessment of any improvements identified. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC18	<p>A written risk assessment considering the risk of fugitive emissions from the installation and the need to undertake ambient air monitoring should be provided to the Agency. The report shall include but need not be restricted to:</p> <ul style="list-style-type: none">• Necessary preventative measures for fugitive emissions;• A recommendation about undertaking ambient air monitoring including monitoring in the vicinity of the HDU maintenance/access points;• A scale drawing showing any proposed monitoring locations;• Any proposed sampling frequencies;• Any proposed trigger levels for the parameters monitored; and• An action plan that identifies actions to be taken should trigger levels be exceeded if monitoring is propose. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC19	<p>The Operator shall consider the subsurface structures present at the site in relation to their potential to cause fugitive emissions to surface and ground water. The assessment will take into account the requirements of section 2.2.5 of the Sector Guidance Note IPPC S5.06 dated December 2004. A written report summarising the findings shall be submitted to the Agency. A timescale for implementation of any improvements shall be submitted to the Agency for approval in writing.</p> <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC20	<p>The Operator shall submit a written procedure for approval by the Agency, in conjunction with the site pre-acceptance and acceptance criteria, to ensure that none of the following are present in the sharps boxes accepted for treatment:</p> <ul style="list-style-type: none"> • Syringes contaminated with any quantity of pharmaceutical waste; • Other pharmaceutical waste; • Cytotoxic and cytostatic contaminated wastes; and • And other excluded wastes. <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The procedure shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed
IC21	<p>The Operator shall provide a report in writing to the Agency detailing the current monitoring method used to determine effluent flow at S1 and having regard to EN, ISO and BS standards. The monitoring method shall be agreed in writing with the Agency.</p>	Completed
IC22	<p>The Operator shall undertake a water use audit in accordance with section 2.4.3 of the Sector Guidance Note IPPC S5.06, dated December 2004.</p> <p>The audit shall be submitted to the Agency in writing with a timetable of improvements to be undertaken for approval by the Agency.</p>	Completed
IC23	<p>The Operator shall ensure that a maintenance and inspection programme of impervious surfaces and containment kerbs is established in accordance with section 2.2.5 of the Sector Guidance Note IPPC S5.06, dated December 2004.</p>	Completed
IC24	<p>The Operator shall assess the method for effluent flow as agreed in IC21 with the requirements given in MCERTS standard 'Minimum requirements for self-monitoring effluent flow' version 1 August 2004. A written report shall be provided to the Agency detailing how this standard is to be achieved and shall include timescales for implementation.</p> <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the procedure.</p> <p>The standard shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	Completed

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC25	<p>The Operator shall submit to Natural Resources Wales for written approval information to evidence compliance with the following BAT requirements in accordance with the requirements specified within the BAT Conclusions of the Waste Treatment BREF Document (EU 2018) in relation to:</p> <ul style="list-style-type: none">• BAT 1 – confirmation that all requirements, such as sector specific (sectoral benchmarking, residues management etc.) requirements are included within the installations Environmental Management System (EMS).	17 February 2022 or otherwise agreed in writing with Natural Resources Wales

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC26	<p>The Operator shall submit to Natural Resources Wales for written approval information to evidence compliance with the following BAT requirements in accordance with the requirements specified within the BAT Conclusions of the Waste Treatment BREF Document (EU 2018) in relation to:</p> <ul style="list-style-type: none"> • BAT 3 - in order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the Environmental Management System, that incorporates all of the following features: <ul style="list-style-type: none"> ○ Information about the characteristics of the waste to be treated and the waste treatment processes; ○ Information about the characteristics of the waste water streams; and ○ Information about the characteristics of the waste gas streams. • BAT 6 – for relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the point where the emission leaves the installation). BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality. • BAT 7 – is to monitor emissions to water with at least the frequency given within the table of BAT 7 and the relevant treatment type, in accordance with EN standards. • BAT 8 – is to monitor emissions to air with at least the frequency given within the table of BAT 8 and the relevant treatment type, in accordance with EN standards. • BAT 20 – in order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques described within the table of BAT 20. • BAT 41 – in order to reduce emissions to air of dust, organic compounds and NH₃, BAT is to apply BAT 14d and to use one or a combination of the techniques listed within the table of BAT 41. BAT-AELs for channelled emissions of dust to air should comply with table 6.8 of BAT 41. 	17 February 2022 or otherwise agreed in writing with Natural Resources Wales
	<p>Information resulting from these improvement conditions will be used to assess the relevance of the BAT-AELs and monitoring requirements as set in Schedule 3 and 4 of this permit.</p>	
	<p>The Operator shall submit for written approval a methodology for meeting the relevant process parameters listed in Schedule 3b Table S3.1 and S3.3, following completion of BAT 3 and the other applicable items listed. The methodology shall identify each of the relevant process parameters and detail the frequency and techniques in place to record the data. Where a process parameter cannot be monitored justification should be provided and/or a suitable alternative proposed. The methodology should include trigger levels for each of the relevant parameters identified with associated procedures in place if trigger levels are exceeded.</p>	

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC27	<p>The Operator shall submit to Natural Resources Wales for written approval information to evidence compliance with the following BAT requirements in accordance with the requirements specified within the BAT Conclusions of the Waste Treatment BREF Document (EU 2018) in relation to:</p> <ul style="list-style-type: none">• BAT 4 – details of how adequate storage capacity is provided and maintained at the site.• BAT 14 – details of the techniques to prevent, or where practicable reduce diffuse emissions to air, in particular of dust, organic compounds and odour. This is in reference to items (a) to (d) of the applicable table within BAT 14.	17 February 2022 or otherwise agreed in writing with Natural Resources Wales
IC28	<p>The Operator shall complete and submit for approval a Phase 1 screening test report for priority hazardous pollutants and any other relevant priority hazardous substances discharged to sewer. For any substance which is not screened out by the screening tests, further modelling (as described in the risk assessment guidance "Surface water pollution risk assessment for your environmental permit") should be undertaken, and the results of the modelling submitted to NRW for approval.</p>	17 February 2022 or otherwise agreed in writing with Natural Resources Wales
IC29	<p>The operator shall submit a written Fire prevention and mitigation plan to Natural Resources Wales.</p> <p>The Fire prevention and mitigation plan must be produced in line with the standards set out in Fire prevention and mitigation plan guidance – Waste.</p>	3 months after permit issue or otherwise agreed in writing with Natural Resources Wales

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels

Raw materials and fuel description	Specification
None set	

Table S2.2 Permitted waste types and quantities for Activity Reference A1, A3, A4 and A7 – Heat Disinfection Unit

Maximum quantity	24 tonnes per day of hazardous and non-hazardous waste
Waste code	Description
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
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)
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02*
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	Sharps (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 ¹
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 and disposable clothing, diapers)
18 01 07	Chemicals other than those mentioned in 18 01 06*
18 01 09	Medicines other than those mentioned in 18 01 08*
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

¹ Excluding: pharmaceutical waste in any form or containers; anatomical waste (identifiable human or animal tissue); carcasses; any waste known or likely to contain ACDP Hazard Group 4 biological agents; any waste from a containment level 3 laboratory; other microbial cultures unless an appropriate treatment methodology has been submitted and agreed by NRW that demonstrates adequate containment and disinfection procedures; cytotoxic and cytostatic contaminated waste; medically contaminated sharps.

Table S2.2 Permitted waste types and quantities for Activity Reference A1, A3, A4 and A7 – Heat Disinfection Unit

Maximum quantity	24 tonnes per day of hazardous and non-hazardous waste
Waste code	Description
18 02 06	Chemicals other than those mentioned in 18 02 05*
18 02 08	Medicines other than those mentioned in 18 02 07*
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 01	Paper and cardboard
20 01 10	Clothes
20 01 32	Medicines other than those mentioned in 20 01 31*
20 01 99	Municipal sharps collection; substances and goods seized/confiscated by police and customs; soiled surgical dressings, swabs, nappies, feminine hygiene, incontinence pads and other similar soiled wastes collected from households, institutions and commercial and industrial premises; drugs related litter

Table S2.3 Permitted waste types and quantities for Activity Reference A2 and A7 Storage of Hazardous Waste

Maximum quantity	Maximum storage of 91.25 tonnes at any one time as follows: <ul style="list-style-type: none"> - Area in front of the HDU: 125 x 770 litre carts = 6.25 tonnes - Yard Area: 25 x 1500 litre carts = 2.5 tonnes - Yard Area: 450 x 770 litre carts = 22.5 tonnes - Yard Area: 15 trailers = 60 tonnes
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 ²
09 01 02*	Water-based offset plate developer solutions ³
09 01 03*	Solvent based developer solutions ³
09 01 04*	Fixer solutions ³
09 01 05*	Bleach and bleach fixer solutions ³
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 materials (including oil filters not otherwise specified), wiping cloths and 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

² This is limited to wastes of this type arising from medical practices or associated research activities.

Table S2.3 Permitted waste types and quantities for Activity Reference A2 and A7 Storage of Hazardous Waste

Maximum quantity	Maximum storage of 91.25 tonnes at any one time as follows: <ul style="list-style-type: none"> - Area in front of the HDU: 125 x 770 litre carts = 6.25 tonnes - Yard Area: 25 x 1500 litre carts = 2.5 tonnes - Yard Area: 450 x 770 litre carts = 22.5 tonnes - Yard Area: 15 trailers = 60 tonnes
Waste code	Description
18 01 03*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection ³
18 01 06*	Chemicals consisting of or containing dangerous substances ²
18 01 08*	Cytotoxic and cytostatic medicines ²
18 01 10*	Amalgam waste from dental care ²
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 02*	Wastes whose collection and disposal is subject to special requirements in order to prevent infection ²
18 02 05*	Chemicals consisting of or containing dangerous substances ²
18 02 07*	Cytotoxic and cytostatic medicines ²
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 ²

³ Excluding: pharmaceutical waste in any form or containers; anatomical waste (identifiable human or animal tissue); carcasses; any waste known or likely to contain ACDP Hazard Group 4 biological agents; any waste from a containment level 3 laboratory; other microbial cultures unless an appropriate treatment methodology has been submitted and agreed by NRW that demonstrates adequate containment and disinfection procedures; cytotoxic and cytostatic contaminated waste; medically contaminated sharps.

Schedule 3(a) – Emissions and monitoring effective until 16th August 2022

Table S3.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 as detailed on 'Air Emission Points Plan	Shredded hood via HEPA filter	Total aerobic bacteria	1,000 cfu/m ³	None set	Quarterly	As specified in Appendix 6. Sector Guidance Note S5.06
		Total coliform bacteria	300 cfu/m ³			
		Total fungi	1,000 cfu/m ³			
A2 as detailed on 'Air Emission Points Plan	Heat disinfecting unit, via scrubber	Total aerobic bacteria	1,000 cfu/m ³			
		Total coliform bacteria	300 cfu/m ³			
		Total fungi	1,000 cfu/m ³			
A3 as detailed on Air Emission Points Plan	Gas fired oil heating system	None set	None set		None set	None set

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1, shown as point 'leaves site' on Drainage Plan	Clean uncontaminated surface water only	No limit set	No limit set			

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 shown as 'to sewer' on Drainage Plan	Drainage from within the building and process water	Flow	No limit set	No limit set	Reported as daily average over 1 month	Estimated from incoming water meter readings

Table S3.4 Process monitoring requirements

Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Heat Disinfection Unit	Treatment Efficacy	Monthly	As specified in Appendix 6. Sector Guidance Note S5.06	

Schedule 3 (b) – Emissions and monitoring effective from 17th August 2022

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 as detailed on Air Emission Points Plan	Shredded hood via HEPA filter and heat disinfecting unit, via scrubber	Dust	5 Mg/Nm ³	None set	Once every 6 months	EN 13284-1
		NH ₃	None set			No EN standard available
		TVOC	None set			EN 12619
A2 as detailed on Air Emission Points Plan	Heat disinfecting unit, via scrubber	Dust	5 Mg/Nm ³	None set	Once every 6 months	EN 13284-1
		NH ₃	None set			No EN standard available
		TVOC	None set			EN 12619
A1 as detailed on Air Emission Points Plan	Shredded hood via HEPA filter	Total aerobic bacteria	1,000 cfu/m ³	None set	Quarterly	BS EN 17359
		Total coliform bacteria	300 cfu/m ³			
		Total fungi	1,000 cfu/m ³			
A2 as detailed on Air Emission Points Plan	Heat disinfecting unit, via scrubber	Total aerobic bacteria	1,000 cfu/m ³	None set	Quarterly	BS EN 17359
		Total coliform bacteria	300 cfu/m ³			
		Total fungi	1,000 cfu/m ³			
A3 as detailed on Air Emission Points Plan	Gas fired oil heating system	None set	None set	None set	None set	None set

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1, shown as point 'leaves site' on Drainage Plan	Clean uncontaminated surface water only	No limit set	No limit set			

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency ¹	Monitoring standard or method
S1 shown as 'to sewer' on Drainage Plan	Drainage from within the building and process water	Flow Rate	No limit set	None set	Continuous	None set
		Arsenic (As) ²	0.05 mg/l		Once every six months ²	Various EN standards available (e.g. EN ISO 11885, EN ISO 17294-2, EN ISO 15586)
		Cadmium (Cd) ²	0.05 mg/l			
		Chromium (Cr) ²	0.15 mg/l			
		Copper (Cu) ²	0.5 mg/l			
		Nickel (Ni) ²	0.5 mg/l			
		Lead (Pb) ²	0.1 mg/l			
		Zinc (Zn) ²	1 mg/l			
		Mercury (Hg) ²	5 µg/l			Various EN standards available (e.g. EN ISO 17852, EN ISO 12846)
PFOA ²	No limit set	Once every six months	No EN standard available			
PFOS ²	No limit set					

¹ In the case of batch discharge less frequent than the minimum monitoring frequency, monitoring is carried out once per batch.

² Monitoring only applies when the substance concerned is identified as relevant in the waste water inventory (as per IC26).

³ In the case of an indirect discharge to a receiving water body, the monitoring frequency may be reduced if the downstream waste water treatment plant abates the pollutants identified.

Table S3.4 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter ^{Note 1}	Monitoring frequency	Monitoring standard or method	Other specifications
Heat Disinfection Unit	Treatment Efficacy	Monthly	As agreed in writing by Natural Resources Wales	

Note 1: There is no requirement to report process monitoring data. The information shall be made available at the Installation for inspection

Schedule 4(a) – Reporting effective until 16th August 2022

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters	A1, A2	Every 12 months	01/01/06
Emissions to sewer	S1	Every 3 months	01/01/06

Table S4.2: Annual production/treatment

Parameter	Units
Amount of waste treated in the Heat Disinfection Unit per year	tonnes

Table S4.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³ /tonnes
Energy usage	Annually	MJ/tonne
Generation of residues	Annually	Tonnes
Generation of waste water	Annually	m ³
Total raw material used	Annually	Tonnes

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	28/10/11
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	28/10/11
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	28/10/11
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	28/10/11
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	28/10/11
Waste Subject to Conditions 4.2.5	Waste tonnage return form from the Natural Resources Wales website or other form as agreed in writing by Natural Resources Wales	N/A

Schedule 4(b) – Reporting effective from 17th August 2022

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1, A2,	Every 6 months	17/08/2022
Emissions to sewer Parameters as required by condition 3.5.1	S1	Every 6 months	17/08/2022

Table S4.2: Annual production/treatment

Parameter	Units
Total amount of waste treated in the Heat Disinfection Unit	tonnes

Table S4.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	M ³
Energy usage	Annually	MWh
Generation of residues	Annually	Tonnes
Generation of waste water	Annually	m ³
Total raw material used	Annually	Tonnes

Table S4.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022
Sewer	Form sewer 1 or other form as agreed in writing by Natural Resources Wales	17/08/2022
Water usage	Form water usage 1 or other form as agreed in writing by Natural Resources Wales	28/10/2011
Energy usage	Form energy 1 or other form as agreed in writing by Natural Resources Wales	28/10/2011
Other performance indicators	Form performance 1 or other form as agreed in writing by Natural Resources Wales	28/10/2011
Waste Subject to Conditions 4.2.5	Waste tonnage return form from the Natural Resources Wales website or other form as agreed in writing by Natural Resources Wales	N/A

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	EPR/WP3636ZG
Name of operator	Tradebe Healthcare National Limited
Location of Facility	Marlborough Road, Wrexham Industrial Estate, Wrexham, LL13 9RJ
Time and date of the detection	

<p>(a)</p> <p>Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment</p> <p>or</p> <p>any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;</p>	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a permit condition	
To be notified within 24 hours of detection	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	

Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

“*Accident*” means an accident that may result in pollution.

“*Annex I*” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*Annex II*” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*Application*” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“*Authorised officer*” means any person authorised by Natural Resources Wales under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“*background concentration*” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“*best available treatment, recovery and recycling techniques*” shall have the meaning given to it in the document published jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive on 27th November 2006, entitled “Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRRT) and Treatment of Waste Electrical and Electronic Equipment (WEEE).”

“*disposal*” or “*D*” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*emissions to land*” includes emissions to groundwater.

“*EP Regulations*” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“*emissions of substances not controlled by emission limits*” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“*groundwater*” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“*Industrial Emissions Directive*” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“*MCERTS*” means the Environment Agency’s Monitoring Certification Scheme.

“*Pests*” means Birds, Vermin and Insects.

“*Quarter*” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“*Recovery*” or “*R*” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

‘*Residue*’ means the solid waste generated by the waste treatment activity and is not directly related to the type of waste treated in the plant.

“*Waste code*” means the six digit code referable to a type of waste in accordance with the list of wastes established by Commission Decision 2000/532/EC as amended from time to time (the ‘List of Wastes Decision’) and in relation to hazardous waste, includes the asterisk.

“*Waste Framework Directive*” or “*WFD*” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*Waste Treatment BAT Conclusions*” means the BAT Conclusions for the Waste Treatment sector published as a Commission Implementing Decision EU 2018/1447 in the Official Journal of the EU on 17 August 2018.

“*Year*” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- (a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- (b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 - Site plan



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END OF PERMIT

Permit Number: WP3636ZG

Operator: Tradebe Healthcare National Limited

Facility: Wrexham Clinical Waste Treatment Facility

Form Number: Air1 / 17/08/2022

Reporting of emissions to air for the period from DD/MM/YYYY to DD/MM/YYYY

Emission							
Emission Point	Substance / Parameter	Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]

- [1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.
- [2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.
- [3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.
- [4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: WP3636ZG

Operator: Tradebe Healthcare National Limited

Facility: Wrexham Clinical Waste Treatment Facility

Form Number: Sewer1 / 17/08/2022

Reporting of emissions to sewer for the period from DD/MM/YYYY to DD/MM/YYYY

Emission							
Emission Point	Substance / Parameter	Limit Value	Reference Period	Result ^[1]	Test Method ^[2]	Sample Date and Times ^[3]	Uncertainty ^[4]

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with Natural Resources Wales is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: WP3636ZG

Operator: Tradebe Healthcare National Limited

Facility: Wrexham Clinical Waste Treatment Facility

Form Number: WaterUsage1 / 28/10/2011

Reporting of Water Usage for the year YYYY

Water Source	Usage (m ³ /year)	Specific Usage (m ³ /unit output)
Mains water		
Site borehole		
River abstraction		
TOTAL WATER USAGE		

Operator's comments :

Signed
(authorised to sign as representative of Operator)

Date.....

Permit Number: WP3636ZG

Operator: Tradebe Healthcare National Limited

Facility: Wrexham Clinical Waste Treatment Facility

Form Number: Energy1 / 28/10/2011

Reporting of Energy Usage for the year YYYY

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh		
Natural Gas	MWh		
Gas Oil	tonnes		
Recovered Fuel Oil	tonnes		
TOTAL	-		

* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments :

Signed
(Authorised to sign as representative of Operator)

Date.....

Permit Number: WP3636ZG

Operator: Tradebe Healthcare National Limited

Facility: Wrexham Clinical Waste Treatment Facility

Form Number: Performance1 / 28/10/2011

Reporting of other performance indicators for the period DD/MM/YYYY to DD/MM/YYYY

Parameter	Units
Total raw material used	tonnes
Total amounts of waste treated	tonnes
Generation of residue waste	tonnes
Generation of waste water	m ³

Operator's comments :

Signed
 (Authorised to sign as representative of Operator)

Date.....