



ENVIRONMENT
AGENCY

Permit with introductory note

Pollution Prevention and Control (England & Wales) Regulations 2000

Bow Beck Clinical Waste Treatment
Facility

G. W. Butler Ltd.
Unit 2 Bow Beck
Bowling Back Lane
Bradford
West Yorkshire
BD4 8SL

Permit number
HP3632MR

Bow Beck Clinical Waste Treatment Facility Permit Number HP3632MR

Introductory note

This introductory note does not form a part of the permit

The main features of the installation are as follows.

The Installation, operated by G. W. Butler Limited, and located at Bowling Back Lane, Bradford, provides for the reception, segregation, repackaging, storage and transfer of various waste types, including Clinical Wastes. A restricted range of wastes are rendered safe through submission to an Alternative Treatment activity comprising steam treatment in two separate 'rotoclaves', with subsequent maceration of the steam treated wastes. A 'Densifier' has been installed to enable further size reduction of the macerated waste stream. A gas-fired boiler provides the steam required by the rotoclave process.

Other ancillary activities such as bin-washing, and vehicle washing take place at the site.

The activities give rise to various aerial emissions, and sewer emissions.

The main environmental issues concerned with the Installation comprise the implementation of the correct waste acceptance procedures to ensure that only wastes which are authorised to be received at the site are accepted, and that those wastes are stored, treated, and recorded safely and appropriately while held at the facility. Of particular importance is the efficacy of the treatment process in rendering safe the treatable wastes.

Status Log of the permit

Detail	Date	Response Date
Application HP3632MR	Duly made 19/12/2006	
Schedule 4 Notice issued	20/09/2007	16/10/2007
Permit issued	30/10/2007	

Superseded or Partially Superseded Licences/Authorisations/Consents relating to this installation

Holder	Reference Number	Date of Issue	Fully or Partially Superseded
G. W. Butler Limited	EAWML/65292	11/03/2004	Partially superseded

The waste management licence shall cease to have effect if and to the extent that treatment, keeping or disposal of waste authorised by the licence is authorised by this permit.

Other existing Licences/Authorisations/Registrations relating to this site

Holder	Reference Number	Date of issue
G. W. Butler Limited	EAWML/65292	11/03/2004

End of Introductory Note

Permit

Pollution Prevention and Control
(England and Wales) Regulations 2000

Permit

Permit number

HP3632MR

The Environment Agency (the Agency) in exercise of its powers under Regulation 10 of the Pollution Prevention and Control (England and Wales) Regulations 2000 (SI 2000 No 1973) hereby authorises

G. W. Butler Ltd ("the operator"),

whose registered office is

Unit 2

Bow Beck

Bowling Back Lane

Bradford

West Yorkshire

BD4 8SL

company registration number 00280133

to operate *an installation* at

Bow Beck Clinical Waste Treatment Facility

Unit 2

Bow Beck

Bowling Back Lane

Bradford

West Yorkshire

BD4 8SL

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

	30/10/2007
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Gavin Bown, Team Leader Strategic Permitting Group

Authorised to sign on behalf of the Agency

Conditions

1 Management

1.1 General management

1.1.1 The activities shall be managed and operated:

- (a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformances and those drawn to the attention of the operator as a result of complaints; and
- (b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

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.

1.2 Accidents that may cause pollution

1.2.1 The operator shall:

- (a) maintain and implement an accident management plan;
- (b) review and record at least every 4 years or as soon as practicable after an accident, (whichever is the earlier) whether changes to the plan should be made;
- (c) make any appropriate changes to the plan identified by a review.

1.3 Energy efficiency

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every 4 years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures by a review.

1.4 Efficient use of raw materials

1.4.1 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 4 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 appropriate further measures identified by a review.

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

1.5.1. The operator shall:

- (a) take appropriate measures to ensure that waste produced by the activities is avoided or reduced, or where waste is produced it is recovered wherever practicable or otherwise disposed of in a manner which minimises its impact on the environment;
- (b) review and record at least every 4 years whether changes to those measures should be made; and
- (c) take any further appropriate measures identified by a review.

1.6 Site security

1.6.1. Site security measures shall prevent unauthorised access to the site, as far as practicable.

2. Operations

2.1 Permitted activities

- 2.1.1 The operator is authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Where there are wastes on site that are not subject to this permit then the wastes subject to the activities authorised under condition 2.1.1, shall be clearly identified.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 2 to this permit.

2.3 Operating techniques

- 2.3.1 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 the Agency.
- 2.3.2 No raw materials or fuels listed in schedule 3 table S3.1 shall be used unless they comply with 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 3 tables S3.2.1, S3.2.2, S3.2.3, S3.2.4, S3.2.5, S3.3; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
 - (c) it is only processed in the activity specified in Table S1.1 of Schedule 1.
- 2.3.4 Records shall be kept of all waste accepted onto the site.
- 2.3.5 The Operator shall ensure that where waste produced at the Permitted Installation(s) is sent to a waste recovery or disposal facility, the facility in question is provided with the following information, prior to receipt of the waste:
- The nature of the process producing the waste
 - The composition of the waste
 - The handling requirements of the waste
 - The hazard classification associated with the waste
 - The waste code of the waste
- 2.3.6 The Operator shall ensure that where waste produced at the Permitted Installation(s) is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Off-site conditions

There are no off-site conditions under this section.

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 the Agency.

- 2.5.2 Except in the case of an improvement which consists only of a submission to the Agency, the operator shall notify the Agency within 14 days of completion of each improvement.

2.6 Pre-operational conditions

- 2.6.1 The operations specified in schedule 1 table S1.4B shall not commence until the measures specified in that table have been completed.

2.7 Closure and decommissioning

- 2.7.1 The operator shall maintain and operate the activities so as to prevent or where that is not practicable, to minimise, any pollution risk on closure and decommissioning.
- 2.7.2 The operator shall maintain a site closure plan which demonstrates how the activities can be decommissioned to avoid any pollution risk and return the site to a satisfactory state.
- 2.7.3 The operator shall carry out and record a review of the site closure plan at least every 4 years.
- 2.7.4 The site closure plan (or relevant part thereof) shall be implemented on final cessation or decommissioning of the activities or part thereof.

2.8 Site protection and monitoring programme

- 2.8.1 The operator shall, within 2 months of the issue of this permit, submit a site protection and monitoring programme.
- 2.8.2 The operator shall implement and maintain the site protection and monitoring programme and shall carry out and record a review of it at least every 4 years.

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 4 tables S4.1, and S4.3.

3.1.2 The limits given in schedule 4 shall not be exceeded.

3.2 Transfers off-site

3.2.1 Records of all the wastes sent off site from the activities, for either disposal or recovery, shall be maintained.

3.3 Fugitive emissions of substances

3.3.1 Fugitive emissions of substances (excluding odour, noise and vibration) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.3.2 All liquids, 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.

3.4 Odour

3.4.1 Emissions from the activities shall be free from odour at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the operator has used appropriate measures to prevent or where that is not practicable to minimise the odour.

3.5 Noise and vibration

3.5.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause annoyance outside the site, as perceived by an authorised officer of the Agency, unless the operator has used appropriate measures to prevent or where that is not practicable to minimise the noise and vibration.

3.6 Monitoring

3.6.1 The operator shall, unless otherwise agreed in writing by the Agency, undertake monitoring for the parameters, at the locations and at not less than the frequencies specified in the following tables in schedule 4 to this permit:

- (a) point source emissions specified in tables S4.1, and S4.3;
- (b) process monitoring specified in table S4.8

- 3.6.2 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.
- 3.6.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified in condition 3.6.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate) unless otherwise agreed in writing by the Agency.
- 3.6.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 4 tables S4.1, and S4.3 unless otherwise specified in that schedule.
- 3.6.5 Within 6 months of the issue of this permit (unless otherwise agreed in writing by the Agency) the site reference data identified in the site protection and monitoring programme shall be collected and submitted to the Agency.

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 the Agency, 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) the site protection and monitoring programme.

4.1.2 Any records required to be made by this permit shall be supplied to the Agency within 14 days where the records have been requested in writing by the Agency.

4.1.3 All records required to be held by this permit shall be held on the installation and shall be available for inspection by the Agency at any reasonable time.

4.2 Reporting

4.2.1 A report or reports on the performance of the activities over the previous year shall be submitted to the Agency by 31 January (or other date agreed in writing by the Agency) 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 this permit against the relevant assumptions, parameters and results in the assessment of the impact of the emissions submitted with the application;
- (b) where the operator's management system encompasses annual improvement targets, a summary report of the previous year's progress against such targets;
- (c) the annual production /treatment data set out in schedule 5 table S5.2;
- (d) the performance parameters set out in schedule 5 table S5.3 using the forms specified in table S5.4 of that schedule; and
- (e) details of any contamination or decontamination of the site which has occurred.

4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Agency, 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 5 table S5.1;
- (b) for the reporting periods specified in schedule 5 table S5.1 and using the forms specified in schedule 5 table S5.4 ; and

- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.3 A summary report of the waste types and quantities accepted and removed from the site shall be made for each quarter. It shall be submitted to the Agency within one month of the end of the quarter and shall be in the format required by the Agency.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding 4 years, submit to the Agency, within 6 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 All reports and notifications required by the permit shall be sent to the Agency using the contact details supplied in writing by the Agency
- 4.2.6 The results of reviews and any changes made to the site protection and monitoring programme shall be reported to the Agency, within 1 month of the review or change.

4.3 Notifications

- 4.3.1 The Agency shall be notified without delay following the detection of:
 - (a) any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution;
 - (b) the breach of a limit specified in the permit;
 - (c) any significant adverse environmental effects.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 6 to this permit within the time period specified in that schedule.
- 4.3.3 Prior written notification shall be given to the Agency of the following events and in the specified timescales:
 - (a) as soon as practicable prior to the permanent cessation of any of the activities;
 - (b) cessation of operation of part or all of the activities for a period likely to exceed 1 year; and
 - (c) resumption of the operation of part or all of the activities after a cessation notified under (b) above.
- 4.3.4 The Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.
- 4.3.5 Where the Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Agency when the relevant monitoring is to take place. The operator shall provide this information to the Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.6 The Agency shall be notified within 7 days of any changes in technically competent management and the name of any incoming person together with evidence that such person has the required technical competence.
- 4.3.7 The Agency shall be provided, within 14 days of the operator or any relevant person being convicted of a relevant offence, (unless such information has already been notified to the Agency), with details of the nature of the offence, the place and date of conviction, and the sentence imposed.

4.3.8 The Agency shall be notified within 14 days of the operator and/or any relevant person lodging an appeal against a conviction for any relevant offence and of the outcome when the appeal is decided.

4.3.9 The Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

- (a) any change in the operator's trading name, registered name or registered office address;
- (b) any change to particulars of the operator's ultimate holding company (including details of an ultimate holding company where an operator has become a subsidiary); and
- (c) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 7 shall have the meaning given in that schedule.

Schedule 1 - Operations

Table S1.1 Activities		
Activity listed in Schedule 1 of the PPC Regulations	Description of specified activity and WFD Annex IIA and IIB operations	Limits of specified activity and waste types
S5.3 Part A(1)(a) The disposal of hazardous waste (other than by incineration or landfill) in a facility with a capacity of more than 10 tonnes per day	Physico-chemical treatment of waste (steam treatment in autoclaves with subsequent maceration of the waste stream); D9	<p>From receipt and segregation of waste to storage and despatch of treated waste. Includes storage of treatable waste prior to treatment, but excludes any storage of non-treatable waste.</p> <p>No waste types shall be submitted to this treatment activity other than those specified in Schedule 3 Table S3.2.1, and subject to conditions 2.5.1, and 2.6.1, those wastes specified in Schedule 3 Tables S3.2.2 and S3.2.3 and S3.2.4.</p> <p>In addition the treatment of the following wastes are not authorised:</p> <ul style="list-style-type: none"> • Sharps or other material contaminated with cytotoxic and cytostatic medicines. • pharmaceutical wastes (other than medicinally contaminated syringes) • waste chemicals and photochemicals • dental amalgam • anatomical waste and animal carcasses • any wastes contaminated with UN transport Category A or Hazard Group 4 pathogens. • certain biohazardous waste, except where identified as suitable for alternative treatment in accordance with relevant guidance contained within S5.06 Appendix 6, and in accordance with any waste pre-acceptance, acceptance, and treatment procedure submitted by the Operator under condition 2.5.1, Table S1.3 Ref. IP8 and approved by the Environment Agency
S5.3 Part A(1)(a) The disposal of hazardous waste (other than by incineration or landfill) in a facility with a capacity of more than 10 tonnes per day	Storage of non-treatable waste prior to off-site disposal; D15	<p>From receipt and segregation of waste to storage and despatch of waste.</p> <p>No waste types shall be stored other than those specified in Schedule 3 Table S3.3</p>

Table S1.1 Activities

Activity listed in Schedule 1 of the PPC Regulations	Description of specified activity and WFD Annex IIA and IIB operations	Limits of specified activity and waste types
Directly Associated Activity		
Physico-chemical treatment of non-hazardous waste	Physico-chemical treatment of non-hazardous waste (densification of sterilised and macerated waste stream); D9	No wastes shall be submitted to the densification activity other than non-hazardous wastes arising from the on-site steam treatment in autoclaves and subsequent maceration of treatable wastes Includes storage of the densified wastes pending transfer off-site. The mass of densified waste stored on site shall not exceed 10 tonnes. The total mass of wastes submitted to the densification activity in any one day shall not exceed 50 tonnes.
Gas fired steam raising boiler	Gas fired steam raising boiler; Net rated thermal input approximately 0.8 MW	No fuel shall be used other than natural gas.
Raw material handling and storage	Raw material handling and storage	From receipt to point of use, including storage.

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	The response to section B2.1, B2.2, B2.3, B2.4, B2.5, B2.6, B2.7, B2.8, B2.9, B2.10, B2.11, B2.12 in the Application Excluding B2.1.1	19/12/2006
	Site protection and monitoring programme	

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IP1	<p>Waste Pre-Acceptance</p> <p>A written waste pre-acceptance procedure shall be submitted to the Agency for approval. The procedure shall take account of the principles specified in section 2.1.1 of Sector Guidance Note IPPC 5.06 dated December 2004, and Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes. 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 detail of the waste producer and process that produced 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>	31 October 2008

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IP2	<p>Waste Acceptance</p> <p>A written waste acceptance procedure shall be submitted to the Agency for approval. The procedure shall take account of the principles specified in section 2.1.2 of Sector Guidance Note IPPC 5.06 dated December 2004, and Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes. 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;• 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 from the date of approval by the Agency in writing.</p>	31 October 2008
IP3	<p>Discharge to Sewer</p> <p>A written report on the existing discharges to sewer shall be submitted to the Agency for approval. The report shall include:</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 concentration) 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 procedure.</p> <p>Any improvements shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	31 October 2008
IP4	<p>Monitoring of Ambient Air Monitoring / Surface Contamination</p> <p>A written risk assessment considering the risk of fugitive emissions from the installation and the need to undertake ambient air and surface monitoring should be provided to the Agency. The report shall include:</p> <ul style="list-style-type: none">• necessary preventative measures for fugitive emissions;• a recommendation about undertaking ambient air and surface monitoring;• a scale drawing showing any proposed monitoring locations• any proposed sampling frequency• any proposed trigger levels for the parameters monitored• action plan that identifies actions to be taken should trigger levels be exceeded if monitoring is proposed. <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 proposed preventative measures and monitoring shall be implemented from the date of approval by the Agency.</p>	31 October 2008
IP5	<p>Washing of Containers</p> <p>A written report considering the cleaning and disinfecting of all clinical waste re-usable</p>	31 October 2008

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
	<p>containers that have been delivered to and emptied at the installation should be provided to the Agency. The report shall include:</p> <ul style="list-style-type: none"> • the type and frequency of cleaning and disinfection 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 the wash water or waste arising; and • details of how 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 report shall be implemented by the Operator from the date of approval by the Agency in writing.</p>	
IP6	<p>VOC and Microbes/Bioaerosols Assessment</p> <p>A written assessment of the Volatile Organic Compounds (VOCs), and microbes/bioaerosols emitted from the process shall be submitted to the Agency. The written assessment shall include:</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, and Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes 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>	31 October 2008
IP7	<p>Justification for Treatment of Non-Hazardous Waste</p> <p>A written justification for the treatment of non-hazardous waste listed in table S3.2.2 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 table S3.2.2:</p> <ul style="list-style-type: none"> - is an efficient use of energy - impedes waste recovery or recycling - 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 procedure.</p> <p>Following written approval by the Agency, only those non-hazardous wastes approved shall be accepted for treatment at the installation.</p>	31 January 2008
IP8	<p>Justification and procedure for pre-acceptance, acceptance, and treatment of selected biohazardous wastes</p> <p>A written justification and procedure shall be submitted to the Agency for the pre-acceptance, acceptance and treatment of all microbiological cultures from any source and any potentially infected waste from pathology departments and research establishments. As a minimum these will take into account the principles specified in section A6.1.4 of Appendix 6 of Sector Guidance Note IPPC 5.06, the Research and Laboratory section of the Safe Management of Healthcare Waste, and should be consistent with the recommendations of current HSE guidance for laboratories.'</p>	31 January 2008

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
	<p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the justification and procedure.</p> <p>The procedure shall be implemented from the date of approval by the Agency in writing.</p>	
IP9	<p>Process verification and routine monitoring of efficacy</p> <p>Process verification and routine monitoring of efficacy shall be carried out. A written procedure shall be submitted to the Agency for</p> <ul style="list-style-type: none">• routine monitoring of process efficacy• subsequent process verification at 4 yearly intervals commencing from the last validation. <p>These shall be in accordance the principles specified in Appendix 6 of Sector Guidance Note IPPC 5.06.</p> <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the justification and procedure.</p> <p>The procedure shall be implemented from the date of approval by the Agency in writing.</p>	31 January 2008
IP10	<p>Operation of treatment process in accordance with validation</p> <p>A written procedure shall be submitted to the Environment Agency for approval which ensure that the autoclaves shall be operated only</p> <ul style="list-style-type: none">• at the time, temperature and pressure settings at which the process was validated• for a total load weight of waste no greater than that proven during validation• for waste types, and where relevant quantities of each type, proven during validation, and in accordance with the restrictions on waste types specified in Table S1.1, and Tables S3.2.1, S3.2.2, S3.2.3, S3.2.4• at a level sufficient to achieve STAATT level III (or IV where applicable) as determined by the criteria and methodology set out S5.06 Appendix 6 <p>The notification requirements of condition 2.5.2 shall be deemed to have been complied with on submission of the justification and procedure.</p> <p>The procedure shall be implemented from the date of approval by the Agency in writing.</p>	31 January 2008

Table S1.4B Pre-operational measures for future development

Reference	Operation	Pre-operational measures
1	Steam treatment of wastes specified in Table S3.2.3	<p>A written justification for the treatment of non-hazardous waste listed in table S3.2.3 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, and Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes. The justification should address whether the treatment of each non-hazardous waste listed table S3.2.3:</p> <ul style="list-style-type: none"> - is effective - is an efficient use of energy - impedes waste recovery or recycling - compromises the treatment of any hazardous waste - has an effect on emissions from the activity <p>No wastes specified in Table S3.2.3 shall be accepted for steam treatment unless the Environment Agency has given prior written approval under this condition.</p>
2	Steam treatment of wastes specified in Table S3.2.4	<p>A written justification for the treatment of wastes listed in table S3.2.4 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, and Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes. The justification should address whether the treatment of each of the wastes listed table S3.2.4:</p> <ul style="list-style-type: none"> - is effective - is an efficient use of energy - impedes waste recovery or recycling - compromises the treatment of any hazardous waste - has an effect on emissions from the activity <p>and should include:</p> <ul style="list-style-type: none"> • proposed pre-acceptance and acceptance criteria for contaminated sharps • assessment of the range of medicines used for injection in the UK • laboratory assessment of the effect of autoclaving on the range of medicines used for injection in the UK, and identification of worst case scenario medicines for process validation • validation of the process using worst case scenario medication <p>No wastes specified in Table S3.2.4 shall be accepted for steam treatment unless the Environment Agency has given prior written approval under this condition.</p>

Schedule 2 - Site plan

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Schedule 3 - Waste types, raw materials and fuels

Table S3.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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Table S3.2.1 Permitted waste types for steam treatment in autoclaves and subsequent maceration	
Waste code	Description
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection †
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection †
20 01 99	Other fractions not otherwise specified †‡
<p>† Note: This may include separately collected fractions of municipal (i.e. not arising from healthcare related activities) clinical waste whose collection and disposal is subject to special requirement in order to prevent infection</p> <p>‡ Note: For the purpose of this Table S3.2.1, these code descriptions shall not apply to</p> <ul style="list-style-type: none"> • Sharps or other material contaminated with cytotoxic and cytostatic medicines; or • medicinally contaminated syringes. <p>Note: Table S1.1 includes additional restrictions on acceptable wastes</p> <p>Note: For the purpose of Table S3.2.1 sharps are authorised for treatment only where they are not medicinally contaminated. For medicinally contaminated syringes see Table S3.2.4</p>	

Table S3.2.2 Permitted waste types for steam treatment in autoclaves and subsequent maceration subject to condition 2.5.1, and Table S1.3 Ref IP7	
Waste code	Description
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers) †
<p>† Note: No clinical wastes shall be accepted for steam treatment under code 18 01 04</p> <p>Note: Table S1.1 includes additional restrictions on acceptable wastes</p>	

Table S3.2.3 Permitted waste types for steam treatment in autoclaves and subsequent maceration subject to prior compliance with condition 2.6.1, and Table S1.4B Ref. 1

Waste code	Description
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
15 01 07	glass packaging
15 01 09	textile packaging
20 01 01	paper and cardboard
20 01 02	glass
20 01 10	clothes
20 01 11	textiles
20 01 38	wood other than that mentioned in 20 01 37
Note: Table S1.1 includes additional restrictions on acceptable wastes	

Table S3.2.4 Permitted waste types for steam treatment in autoclaves and subsequent maceration subject to prior compliance with condition 2.6.1, and Table S1.4B Ref. 2

Waste code	Description
18 01 01 (with or without 18 01 09)	Medicinally contaminated non-infectious sharps/syringes †
18 01 03* (with or without 18 01 09)	Medicinally contaminated infectious sharps/syringes†
18 02 02* (with or without 18 02 08)	Medicinally contaminated infectious sharps/syringes†
† Note: For the purpose of Table S3.2.4, these code descriptions shall apply only to medicinally contaminated sharps/syringes and not to other pharmaceutical wastes.	
Note: Table S1.1 includes additional restrictions on acceptable wastes	

Table S3.2.5 Permitted waste quantities for steam treatment in autoclaves and subsequent maceration

Maximum quantity	No more than 40 tonnes in total of wastes specified in Tables S3.2.1, and S3.2.2 (subject to condition 2.5.1, and Table S1.3 Ref. IP7), and S3.2.3 (subject to condition 2.6.1, and Table S1.4B Ref 1), and S3.2.4 (subject to condition 2.6.1, and Table S1.4B Ref 2) shall be kept on site at any one time
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Table S3.3 Permitted hazardous waste types and quantities for storage and transfer off-site for disposal or recovery

Maximum quantity	No more than 10 tonnes of non-treatable hazardous waste shall be kept on site at any one time
Waste codes	Description
18 01 06*	chemicals consisting of or containing dangerous substances
18 01 08*	cytotoxic and cytostatic medicines
18 01 10*	amalgam waste from dental care
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 05*	chemicals consisting of or containing dangerous substances
18 02 07*	cytotoxic and cytostatic medicines
20 01 31*	cytotoxic and cytostatic medicines

Schedule 4 – Emissions and monitoring

Table S4.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1	No parameters set	Gas-fired boiler exhaust	No limit set	--	--	Permanent sampling access not required
A2	No parameters set	Rotoclave 1	No limit set	--	--	Permanent sampling access not required
A3	No parameters set	Rotoclave 2	No limit set	--	--	Permanent sampling access not required
A4	No parameters set	General process area ventilation	No limit set	--	--	Permanent sampling access not required

Table S4.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1	No parameters set	Condensate from Rotoclaves and condensers; and Effluent from Boiler blowdown, Bin washing, Cleaning, and Offices and amenities	No limit set	--	--	--
S2	No parameters set	Effluent from yard and car park run-off; and Vehicle washing, Via interceptor	No limit set	--	--	--

Table S4.8 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Steam treatment of waste in autoclaves with subsequent maceration	Treatment efficacy (routine monitoring)		In accordance with guidance in Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes	

Schedule 5 - Reporting

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

Table S5.1 Reporting of monitoring data

Parameter	Emission or monitoring point/reference	Reporting period
Treatment efficacy (routine monitoring) as specified in Table S4.8	Steam treatment of waste in autoclaves with subsequent maceration as specified in Table S4.8	Quarterly

Table S5.2: Annual production/treatment

Parameter	Units
Hazardous waste treated	tonnes
Hazardous waste (non-treatable) accepted for transfer	tonnes
Non-hazardous waste treated	tonnes

Table S5.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S5.4 Reporting forms

Media/parameter	Reporting format
Sewer	Form sewer 1 or other form as agreed in writing by the Agency
Water usage	Form water usage1 or other form as agreed in writing by the Agency
Energy usage	Form energy 1 or other form as agreed in writing by the Agency
Waste return	Form waste 1 or other form as agreed in writing by the Agency

Schedule 6 - 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 PPC Regulations.

Part A

Permit Number	HP3632MR
Name of operator	G. W. BUTLER LIMITED
Location of Installation	BOW BECK CLINICAL WASTE TREATMENT FACILITY UNIT 2 BOW BECK BOWLING BACK LANE BRADFORD BD4 8SL
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution

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 limit

To be notified within 24 hours of detection unless otherwise specified below	
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) Notification requirements for the detection of any significant adverse environmental effect	
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 installation in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of G. W. BUTLER LIMITED

Schedule 7 - Interpretation

"*accident*" means an accident that may result in pollution.

"*accident management plan*" means a documented procedure (or procedures) that set out the measures necessary to prevent accidents occurring within the permitted installation, during both normal and abnormal operations, and limit the consequences to human health or the environment of any such accidents that do occur.

"*annually*" means once every year.

"*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 4 to the PPC Regulations.

"*authorised officer*" means any person authorised by the Agency 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.

"*certain biohazardous waste*" shall have the same meaning as in Appendix 6 Sector Guidance Note IPPC S5.06 – Supplementary PPC for Clinical Wastes

"*cytotoxic and cytostatic medicines*" shall have the same meaning as given in the Glossary of Hazardous Waste: interpretation of the definition and classification of hazardous waste (2nd edition V2.1)

"*disposal*" shall mean any of the operations provided for in Annex IIA to Directive 75/442/EEC.

"*emissions to land*", includes emissions to groundwater.

"*fugitive emission*" means an emission to air, water or land from the activities which is not controlled by an emission 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.

"*land protection guidance*", means Agency guidance "H7 - Guidance on the protection of land under the PPC Regime: application site report and site protection monitoring programme".

"*MCERTS*" means the Environment Agency's Monitoring Certification Scheme.

"*notify/notified without delay*" means that a telephone call can be used, whereas all other reports and notifications must be supplied in writing, either electronically or on paper.

"*PPC Regulations*" means the Pollution, Prevention and Control (England and Wales) Regulations SI 2000 No.1973 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

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

"*recovery*" shall mean any of the operations provided for in Annex IIB to Directive 75/442/EEC.

"*relevant person*" and "*relevant conviction*" shall have the meanings given to them in the Environmental Protection Act 1990

“*site protection and monitoring programme*” means a document which meets the requirements for site protection and monitoring programmes described in the Land Protection Guidance.

“*STAATT*” is the State and Territorial Association on Alternative Treatment Technologies

“*STAATT Level III criteria*” is a standard for reduction in numbers or activity of pathogens recommended by STAATT applied after consideration of domestic legislation and developments in knowledge by Appendix 6 S5.06

“*technically competent management*” and “*technical competence*” shall have the meanings given to them in the Environmental Protection Act 1990.

“*waste code*” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“*WFD*” means Waste Framework Directive (75/442/EEC).

“*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

END OF PERMIT