

c/o Dan Ginnetti  
Company Director  
SRCL Limited

**Date:** 10 February 2021

Sent by email: [DG10028@STERICYCLE.com](mailto:DG10028@STERICYCLE.com)

Dear Sir,

**Request for Information: Healthcare Waste Permit Review**

**Permit Number: EPR/CB3200UL (EAWML 401880)**

**Operator: SRCL Ltd**

**Facility/Location: Ilkeston Healthcare Waste Transfer Station**

We have recently reviewed and updated our technical guidance for the healthcare waste sector [EPR 5.07](#) (Clinical waste). The revised technical guidance [Healthcare Waste: Appropriate measures for permitted facilities](#) sets out the standards we expect operators to meet in order to comply with the requirements of their environmental permit.

We intend to review all healthcare waste permits from 2021 and replace references to EPR 5.07 and include conditions to implement the revised appropriate measures guidance. For the permit review process we require you to provide information about:

- your activities on site
- your management system
- your waste pre-acceptance, acceptance and tracking appropriate measures
- your waste storage, segregation and handling appropriate measures
- your waste treatment appropriate measures
- your emissions control appropriate measures
- your emissions monitoring and limits appropriate measures
- your process efficiency measures
- hazardous substance release
- your site infrastructure plan
- storage capacity
- types of waste accepted
- existing pre-operational and improvement conditions
- combustion plant or specified generators you use at your facility
- your climate change adaptation measures

Please find enclosed an information notice issued under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 that relates to the above permit. The notice specifies the information you need to provide and the date by which it must be submitted to the Environment Agency. We may take enforcement action against you if you fail to respond to this notice.

If you have any queries regarding this notice please contact Jill Rooksby at [wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk) or telephone 02030 252738 in the first instance.

Yours faithfully

**Anthony Watts**  
**Senior Permitting Officer**

**Environmental Permitting (England and Wales) Regulations 2016  
Regulation 61(1)**

**NOTICE REQUIRING INFORMATION**

To: SRCL Ltd

Permit Reference: EPR / CB3200UL (EAWML 401880)

Regulated Facility: Ilkeston Healthcare Waste Transfer Station

The Environment Agency requires you to provide the information specified in Schedule 1 of this notice by Monday 1 June 2021

1. The information must be sent by email to:

[wastetreatment@environment-agency.gov.uk](mailto:wastetreatment@environment-agency.gov.uk)

**Date:** 10 February 2021

**Signed: Anthony Watts**

**Senior Permitting Officer**

**Please see over for notes.**

## **Environmental Permitting (England and Wales) Regulations 2016 Regulation 61(1)**

### **Notes:**

1. For the purposes of discharging its functions under the Environmental Permitting (England and Wales) Regulations 2016, the Environment Agency may (by virtue of Regulation 61(1) of those Regulations), require any person to provide information.
2. Failure to comply with this notice without reasonable excuse is an offence under Regulation 38(4)(a) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.
3. Making any statement in response to this notice that you know to be false or misleading in a material particular, or recklessly making any statement which is false or misleading in a material particular is an offence under Regulation 38(4)(b) of the Environmental Permitting (England and Wales) Regulations 2016, and may lead to legal action being taken against you.
4. There is no right to appeal against this notice.
5. You may wish to seek independent legal advice.

**Environmental Permitting (England and Wales) Regulations 2016  
Regulation 61(1)**

SCHEDULE 1

Description of information required

The Environment Agency is required to undertake a periodic review of your permit. This review has been initiated as a result of us reviewing and publishing our revised guidance Healthcare Waste: appropriate measures at permitted facilities. This Notice sets out the information we require from you in order to be able to carry out a review of your permit. Subject to your response to this Notice we will vary your permit to ensure that it delivers compliance with the updated requirements.

If you no longer wish to operate, you must inform us of this within 3 months of the date of this notice, and confirm the date when you will cease operations.

**Non-technical Summary: Please provide a brief non-technical description of your regulated facility**

*Please include the following information where appropriate :*

- *The listed activities and waste operations at the site, and whether the permit is consolidated or if there is more than one permit for the site*
- *A brief non-technical description of the facility, including the key stages in the “process” and the relevant disposal and recovery operations*
- *An indication of the scale of the operation, for example treatment, repackaging and storage capacity*
- *A brief description of the principal releases to air, land and water including noise and odour, along with a description of any abatement techniques*
- *A description of the site location and any key sensitive receptors*
- *Any specific significant legislation that applies and why, for example MCPD*

N/A

- *A description of any management systems, for example ISO 14001*

Please refer to section 2, 2.1 and 2.2 of document reference SRCL\_CB3200UK\_ILK\_REG61

## 1. Activities

Confirm which of the waste processes listed below are carried out or apply at your site.	Check the boxes below if the activity applies at your site	Provide a description of each process <i>Include, where relevant, number of plant/lines, mode of operation (batch or continuous), maximum daily potential capacity, maximum validated load, whether treating hazardous and/or non-hazardous healthcare waste (include EWC codes) with reference to <a href="#">Types of healthcare waste by packaging colour</a>, whether treating for recovery and/or disposal, chemicals used (for example for chemical disinfection) and abatement equipment used including manufacturer/model. Where heat is provided to the treatment process please explain how this is provided and what emissions are released.</i>
<b>Shredding</b>		
Integrated pre-shredder for untreated waste	<input type="checkbox"/>	
Separate pre-shredder for untreated waste	<input type="checkbox"/>	
Integrated post-shredder for treated waste	<input type="checkbox"/>	
Separate post-shredder for treated wastes	<input type="checkbox"/>	
Shredding untreated waste for off-site recovery or disposal	<input type="checkbox"/>	
No shredding of waste	<input checked="" type="checkbox"/>	
<b>Alternative treatment (AT) (sterilisation)</b>		
Hot oil auger	<input type="checkbox"/>	
Autoclave / Rotoclave	<input type="checkbox"/>	
Hydroclave	<input type="checkbox"/>	
Microwave	<input type="checkbox"/>	

Friction heat	<input type="checkbox"/>	
Other (please specify)	<input type="checkbox"/>	
No alternative treatment	<input checked="" type="checkbox"/>	
<b>Alternative Treatment Plant (ATP) floc</b>		
Compaction of ATP floc	<input type="checkbox"/>	
Other treatment/processing of ATP floc	<input type="checkbox"/>	
No compaction or treatment of ATP floc	<input checked="" type="checkbox"/>	
<b><u>Compaction of offensive waste</u></b>		
Light compaction	<input checked="" type="checkbox"/>	Please refer to section 3.1 of document reference SRCL_CB3200UK_ILK_REG61
Heavy compaction	<input type="checkbox"/>	
No compaction	<input type="checkbox"/>	
<b>Repackaging of healthcare waste</b>		
Taking a waste package (for example a bag, drum or box) out of one cart or bulk container (for example a skip) and placing it into another cart or bulk container (for example, a skip).	<input checked="" type="checkbox"/>	Yes  Cart/bulk container to skip (offensive waste currently, and non-hazardous pharmaceutical proposed).  Repackaging of waste i.e. palletization of rigid units or 'bulking' of approved packages into a trailer is currently undertaken by Stericycle however is not included as a repacking activity within the permit as required by point 23 of

		<p>waste storage, segregation and handling appropriate measures. Stericycle propose its inclusion under the review process.</p> <p>Please refer to section 3.2 &amp; 3.3 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>A copy of Stericycle's loose waste handling procedure is attached (appendix 6).</p>
<p>Taking a waste package from a cart or bulk container (for example, skip) and placing it onto a pallet or vehicle.</p>	<p><input checked="" type="checkbox"/></p>	<p>Yes</p> <p>Cart/bulk container to Pallet/pallet box</p> <p>Cart/bulk container to Trailer</p> <p>Repackaging of waste i.e. palletization of rigid units or 'bulking' of approved packages into a trailer is currently undertaken by Stericycle however is not included as a repacking activity within the permit as required by point 23 of waste storage, segregation and handling appropriate measures. Stericycle propose its inclusion under the review process.</p> <p>Please refer to section 3.3 of document reference SRCL_CB3200UK_ILK_REG61</p> <p>A copy of Stericycle's loose waste handling procedure is attached (appendix 6).</p>
<p>Taking a waste package from a pallet and placing it into a cart or bulk container (for example, skip).</p>	<p><input checked="" type="checkbox"/></p>	<p>Yes</p> <p>Palletised non-hazardous pharmaceutical into skip (proposed)</p> <p>Pallet to cart/bulk container/trailer</p>

		<p>Repackaging of waste i.e. palletization of rigid units or ‘bulking’ of approved packages into a trailer is currently undertaken by Stericycle however is not included as a repacking activity within the permit as required by point 23 of waste storage, segregation and handling appropriate measures. Stericycle propose its inclusion under the review process.</p> <p>Please refer to section 3.2 and 3.3 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>A copy of Stericycle’s loose waste handling procedure is attached (appendix 6).</p>
Transferring, removing or separating waste from its primary packaging into another container but only where the primary package is designed specifically for re-use.	<input type="checkbox"/>	
Transferring, removing or separating waste from its primary packaging into another container where the primary package is not designed specifically for re-use.	<input type="checkbox"/>	
No repackaging	<input type="checkbox"/>	
<b>Cleaning &amp; disinfection of containers/carts</b>		
Automated, contained bin wash facility that cleans and disinfects	<input checked="" type="checkbox"/>	Please refer to section 3.4 of document reference SRCL_CB3200UK_ILK_REG61.
Other wash process that cleans and disinfects	<input type="checkbox"/>	
Other wash process that cleans but does not disinfect	<input type="checkbox"/>	
No cleaning or washing of containers or carts	<input type="checkbox"/>	

<p><b>Please detail any other waste operations or processes carried out at your facility that are not covered by the sections above.</b></p>	
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2. <u>General management appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the general management appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, staff competence point 3) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification for the alternative measures here (or in a separate document).</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	No	<p>The measures that the facility is not currently in compliance with are:</p> <ul style="list-style-type: none"> <li>Preventing accidental emissions points 4, 5, 6 &amp; 8.</li> </ul> <p>We intend to be in full compliance with these measures within 3 years. Please refer to section 4.3 of document reference SRCL_CB3200UK_ILK_REG61 for full details of the plans to achieve compliance.</p> <p>The facility is currently in compliance with all other general management appropriate measures given in the guidance.</p> <p>Please refer to section 4 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.</p>
Does your management system include:	<b>Answer</b> Yes/No/NA	
<ul style="list-style-type: none"> <li>an odour management plan?</li> </ul>	Yes	Please refer to section 4.10 and 8.10 of document reference SRCL_CB3200UK_ILK_REG61
<ul style="list-style-type: none"> <li>a noise and vibration management plan?</li> </ul>	N/A	Item screened out in Environmental Risk Assessment. Only required by exception if triggered by relevant permit condition.
<ul style="list-style-type: none"> <li>a dust management plan?</li> </ul>	N/A	Item screened out in Environmental Risk Assessment. Only required by exception if triggered by relevant permit condition.
<ul style="list-style-type: none"> <li>a pest management plan?</li> </ul>	N/A	Item screened out in Environmental Risk Assessment. Only required by exception if triggered by relevant permit condition.

<ul style="list-style-type: none"> <li>a fire prevention plan?</li> </ul>	N/A	Not in scope for the types of waste stored and treated. Please refer to section 4.4 of document reference SRCL_CB3200UK_ILK_REG61
<b>3. <u>Waste pre-acceptance, acceptance and waste tracking appropriate measures</u></b>	<b>Answer</b> Yes/No/NA	<b>Date compliance expected / Response / Reference to attached document</b>
<p>Do you currently comply with all the waste pre-acceptance, acceptance and tracking appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, waste acceptance point 5 and 6) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	No	<p>The measures that the facility is not currently in compliance with are:</p> <ul style="list-style-type: none"> <li>Waste acceptance points 21 &amp; 22.</li> <li>Waste tracking point 6.</li> </ul> <p>For these points we are proposing alternative measures which are set out in section 5.2 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>The facility is currently in compliance with all other general management appropriate measures given in the guidance.</p> <p>Please refer to section 5 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.</p>

4. <u>Waste storage, segregation and handling appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the waste storage segregation and handling appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, waste storage, segregation and handling points 22 and 23) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	No	<p>The measures that the facility is not currently in compliance with are:</p> <ul style="list-style-type: none"> <li>• Waste storage, segregation and handling points 13 &amp; 20</li> <li>• Compaction of healthcare waste point 4</li> </ul> <p>For waste storage, segregation and handling point 13 we are proposing alternative measures which are set out in section 6.3 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>For waste storage, segregation and handling point 20 we intend to be in compliance within 12 months. For details of how this will be achieved please refer to section 6.5 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>For compaction of healthcare waste point 4 we intend to be in compliance within 12 months. For details of how this will be achieved please refer to section 3.1 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>The facility is currently in compliance with all other general management appropriate measures given in the guidance.</p> <p>Please refer to section 6 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.</p>

<p>If you repackage healthcare waste at your facility confirm what types of healthcare waste you repackage, and describe the repackaging activity and say how and where on site you carry it out.</p>		<p>Please refer to sections 3.1, 3.2 and 3.3 of document reference SRCL_CB3200UK_ILK_REG61 for descriptions of the repackaging activities.</p> <p>Please refer to sections 13.1 of document reference SRCL_CB3200UK_ILK_REG61 for a list of waste codes associated with repackaging activities.</p>
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5. <u>Waste treatment appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>If you carry out waste treatment activities do you currently comply with all the waste treatment appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, General Waste Treatment points 3 and 9) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which they are including subsection heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p> <p>If you treat waste, submit an up to date <a href="#">H1 assessment</a>.</p>	N/A	Please refer to section 7 of document reference SRCL_CB3200UK_ILK_REG61 for full details.

6. <u>Emissions control appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the emissions control appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, emissions of noise and vibration point 4) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which they are including subsection heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance</p>	Yes	Please refer to section 8 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.

7. <u>Emissions monitoring and limits appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the emissions monitoring and limits appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, chemical emissions to air point 2) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance</p>	Yes	Please refer to section 8 & 9 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.
<p>Does your facility have any point source emissions to air?</p> <p>If you answer Yes, submit a fully characterised emissions inventory for your facility (see subsection Emissions to air).</p>	No	
<p>Are any of your point source emissions to air abated?</p> <p>If you answer Yes, confirm which emission points are abated, what forms of abatement are provided (for example HEPA filter, carbon filters, and scrubbers), what plant or process it serves, and what pollutant(s) it abates.</p>	N/A	
<p>Does your facility have any point source emissions to water (surface water, sewer or groundwater)?</p>	Yes	There is a single point source emission to sewer from the permitted facility (S1 – container washing activities).

<p>If you answer Yes, submit a fully characterised emissions inventory for your facility (see subsection Emissions to water or sewer).</p> <p>If you discharge to surface water confirm whether the discharge is authorised by your environmental permit or by an alternative permission.</p> <p>If the emission is to sewer provide a copy of the discharge consent.</p>		<p>Please refer to section 9.2 of document reference SRCL_CB3200UK_ILK_REG61 for full details.</p> <p>A copy of the emissions inventory is provided in appendix 8.</p> <p>A copy of the discharge consent is provided at appendix 7.</p>
<p>Is there any storage or treatment of water or effluent on site prior to discharge?</p> <p>If you answer Yes, confirm what forms of treatment are provided (for example neutralisation, flocculation, settlement), what plant or process it serves and what pollutant(s) it treats.</p>	No	
<p>Do you currently monitor your facility's point source emissions to air or water?</p> <p>If you answer Yes, please detail the parameters or pollutants monitored and the monitoring methods and frequencies used.</p>	Yes	<p>Please refer to sections 9.2 of document reference SRCL_CB3200UK_ILK_REG61.</p>

8. <u>Process efficiency appropriate measures</u>	Answer Yes/No/NA	Date compliance expected / Response / Reference to attached document
<p>Do you currently comply with all the process efficiency appropriate measures given in the guidance?</p> <p>If you answer No, confirm which appropriate measures you are not in compliance with including subsection heading and numbered points (for example, energy efficiency point 2) and tell us when you will be in full compliance.</p> <p>If you believe some appropriate measures in this section are not applicable, please explain which ones they are including heading and numbered points and why you consider they do not apply.</p> <p>If you are proposing alternative measures to those in the guidance, please indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and your justification.</p> <p>Note: If you are proposing alternative measures, you must explain how they provide an equivalent level of environmental protection to the measures given in the guidance.</p>	Yes	Please refer to section 10 of document reference SRCL_CB3200UK_ILK_REG61 for full details of current measures.

9. Hazardous substance release	Response / Reference to attached document
<p>Where you are undertaking a listed activity which involves the use, production or release of a relevant hazardous substance (as defined in Article 3(18) of the Industrial Emissions Directive), you must carry out a risk assessment considering the possibility of soil and groundwater contamination at the installation with such substances. Where any risk of such contamination is established, either:</p> <ul style="list-style-type: none"> <li>• prepare and submit a baseline report<sup>1</sup> containing information necessary to determine the current state of soil and groundwater contamination; or</li> <li>• provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of soil and groundwater contamination, so as to enable a <u>quantified</u> comparison to be made with the state of soil and groundwater contamination upon definitive cessation of the activity.</li> </ul> <p>If you have concluded that there are no risks of soil and groundwater contamination, provide a copy of the risk assessment.</p>	<p>Please refer to section 8.4 and 11 of document reference SRCL_CB3200UK_ILK_REG61.</p> <p>Groundwater and soil risk assessment provided in appendix 9</p>

<sup>1</sup> Baseline report - Defra Guidance - Industrial emissions Directive EPR Guidance on Part A installations (Section 5.10 – 5.15, pages 28-29)  
<https://www.gov.uk/government/publications/environmental-permitting-regulations-guidance-on-part-a-installations>

10. Site infrastructure plan	Response / Reference to attached document	
<p>Provide a copy of an up to date site infrastructure plan (or plans) to include the relevant items in the guidance Develop a Management System for Environmental Permits, in particular:</p> <ul style="list-style-type: none"> <li>• Buildings (with any internal storage areas identified)</li> <li>• Storage bays, tanks, compactor skips</li> <li>• Treatment plant</li> <li>• Drainage including direction of flow of water in the drain; surface water drainage; discharge points to sewer, watercourse or soakaway; manhole covers and drains</li> <li>• Location of point source emissions to air</li> <li>• Container washer</li> <li>• Quarantine area</li> <li>• Entrances and Exits to be used by the emergency services</li> <li>• Surfacing types (for example permeable unmade ground, impermeable hard standing) and containment measures (for example bunds and kerbing)</li> </ul> <p>In addition, the plan(s) should include the maximum capacities of the individual storage areas (number of pallets, containers, bins etc. and tonnes equivalent).</p>	<p>A site infrastructure plan is enclosed at appendix 5a,b,&amp; c.</p> <p>Please refer to section 12 of document reference SRCL_CB3200UK_ILK_REG61 for details of our plans to develop improved site infrastructure plans within 12 months.</p>	
11. Storage capacity	Tonnes	
<p>What is the total capacity of waste that can be physically stored on site at any one time in the building in compliance with the guidance?</p>	<p>50 tonnes</p> <p>Please refer to the table in section 6.4 of document reference SRCL_CB3200UK_ILK_REG61 for full details</p>	
<p>What is the total capacity of waste that can be physically stored on site at any one time outside the building in compliance with the guidance?</p>	<p>16 tonnes in compactor skips or mobile compactor vehicle</p> <p>69 tonnes in vehicle trailers</p>	

	<p>69 tonnes in vehicle trailers is equivalent to 22 tonnes in carts in the same storage space if trailers cannot be used.</p> <p>Please refer to the table in section 6.4 of document reference SRCL_CB3200UK_ILK_REG61 for full details</p>
<p><b>Additional comments</b></p>	<p>The Ilkeston permit is currently a waste operation based on &lt;50t storage. The current permit has a bespoke condition (2.4.1) which is currently in use. This condition allows for additional storage up to 92 tonnes hazardous and 43 tonnes non-hazardous. Stericycle propose that the limits within this condition are retained and normalised making the permit an installation. This would be under the techniques as described within section 6.2, 6.3 and 6.4 of document reference SRCL_CB3200UK_ILK_REG61.</p>

12. <a href="#">Types of waste</a>	Answer Yes/No	Details of waste accepted / Reference to attached document
<p>Are you permitted to accept wastes other than in the types of healthcare waste included in the packaging colour table?</p> <p>If you answer Yes and the other wastes include chemical wastes tell us:</p> <ul style="list-style-type: none"> <li>• if you are currently complying with all the appropriate measures given in the chemical waste: appropriate measures for permitted facilities guidance?</li> <li>• which appropriate measures you are not currently in compliance with including subsection heading and numbered points and tell us when you will be in full compliance.</li> <li>• whether you believe some appropriate measures in this guidance are not applicable and explain which ones they are including sub section heading and numbered points.</li> </ul> <p>If you are proposing alternative measures to those in that guidance, indicate which appropriate measures, by subsection heading and numbered points, you will provide alternative measures for, what the alternative measures are and justification here or in a separate document.</p>	Yes	<p>The only additional wastes that are permitted at the facility but not included in the referenced table are as follows:</p> <ul style="list-style-type: none"> <li>- 070513* Solid wastes containing dangerous substances from the MFSU of pharmaceuticals</li> <li>- 070514 Solid wastes other than those mentioned in 070513 from the MFSU of pharmaceuticals</li> </ul> <p>These wastes are permitted for storage and transfer. These waste types are packaged and stored in the same way as the equivalent healthcare waste codes for pharmaceutical wastes (180108 and 180109 respectively).</p> <p>Please refer to section 13 of document reference SRCL_CB3200UK_ILK_REG61 for a full list of permitted waste types by activity.</p>
<p>Are you permitted to accept non-EWC coded wastes (for example UK waste classification system or Department of Environment codes)?</p> <p>If you answer Yes, please provide details of the waste types and the equivalent EWC codes and descriptions, with reference to <a href="#">Types of healthcare waste by packaging colour</a>.</p>	No	

<p>Does your permit require healthcare wastes to be segregated and packaged to conform with HTM 07.01?</p> <p>If you answer No, please reference the categorisation approach (for example Categories A to E Safe Disposal of Clinical Waste)</p>	<p>Yes</p>	
<p><b>13. Existing Pre-operational Conditions</b></p>	<p><b>Answer Yes/No</b></p>	<p><b>Details of outstanding pre-operational conditions / Reference to attached document</b></p>
<p>Do you have any outstanding pre-operational conditions in your existing permit?</p>	<p>Yes</p>	<p>PO1.</p> <p>Please refer to section 14 of document reference SRCL_CB3200UK_ILK_REG61 for full details</p>
<p><b>14. Existing Improvement Conditions</b></p>	<p><b>Answer Yes/No</b></p>	<p><b>Details of outstanding pre-operational conditions / Reference to attached document</b></p>
<p>Do you have any outstanding improvement conditions in your existing permit?</p>	<p>No</p>	<p>Please refer to section 15 of document reference SRCL_CB3200UK_ILK_REG61 for full details</p>

15. Combustion plant or specified generators on site	Answer Yes/No	Response / Reference to attached document
<p>Do you have a combustion plant or specified generator(s) associated with your permitted activity, as per Schedule 25A or 25B of The Environmental Permitting (England and Wales) Regulations 2016?</p> <p>If you answer Yes, tell us:</p> <ul style="list-style-type: none"> <li>• the individual thermal input of your combustion plant(s) and/or specified generator(s), including any additional back-up diesel generators.</li> <li>• the date that each combustion plant and generator came into operation.</li> <li>• the type of plant (boiler, engine etc)</li> <li>• the fuel used;</li> <li>• the hours of operation per year.</li> <li>• if applicable, details of contracts to supply electricity or do Triad specifically the date entered in to the contract or agreement</li> </ul>	No	
16. <a href="#">Climate change</a>	Answer Yes/No	Response / Reference to attached document
Have you considered whether your operations could be affected by a changing climate, for example by having a climate change adaptation plan in place?	Yes	An assessment has been conducted using the Environment Agency's climate change risk screening tool. Please refer to section 10.3 of document reference SRCL_CB3200UK_ILK_REG61 for full details.

In all cases, where information required by this notice has been previously submitted to and accepted by the Environment Agency, and where this remains current and valid, you do not need to resubmit it. Instead, clearly specify the nature of the information and the date it was submitted, with the document reference and version number.

**Key URLs for guidance:**

<https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities>

<http://eippcb.jrc.ec.europa.eu/reference/wt.html>

<https://www.gov.uk/guidance/best-available-techniques-environmental-permits#how-to-propose-an-alternative-technique>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010L0075>

<http://www.legislation.gov.uk/uksi/2018/110/regulation/16/made>