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28/07/2023

Normal Variation to Waste Permit Number LP3037UU (Hillingdon Clinical Waste Incinerator)

Dear Sir or Madam

Enclosed are all the associated forms and paperwork related to the Normal Variation to Waste Permit Number: **LP3037UU**.

Medisort Limited has operated a clinical waste Treatment and Transfer Facility in Littlehampton on the South Coast since 28th May 2010. Medisort Limited was awarded the contract in June 2021 as a waste disposal provider and incinerator operator for Hillingdon Hospital on behalf of the Hillingdon Hospital NHS Foundation Trust.

The Facility and the surrounding infrastructure are currently undergoing a major refit, which Medisort Limited and the Hillingdon Hospital NHS Foundation Trust anticipate will be ready for recommissioning in October 2023. These improvements will align the Facility with current BAT guidance and amend the concerns raised previously by the Health & Safety Executive (HSE) in 2019 concerning fugitive emissions into the working environment.

This Normal Variation is to cover various improvements to the plant and infrastructure, which are listed below:

- Installation of a twin pass boiler.
- Installation of an automated combustion control system, referred to as Intelligent Combustion Management System (ICMS), to control and optimise the operation of the combustion process.
- Changing the acid gas reagent from lime to sodium bicarbonate.
- Replace the bag filters with dry ceramic filters to abate emissions of dusts.
- Improvements to external areas of hard standing and surface water drainage systems; and
- Modifications to the bin wash system to utilise waste steam.

Medisort Limited and Hillingdon Hospital NHS Foundation Trust are asking the Environment Agency to prioritise this variation application on the following grounds; we believe we have a unique situation; not only are we submitting this variation, but we will be submitting our Reg 61 reply along with our recommissioning plan, and of course, we are conscious of time frames. We have raised the subject of priority with our local regulator Howard Tee (howard.tee@environment-agency.gov.uk), who supports the prioritised request because he wishes to avoid arranging and managing a Local Enforcement Position (LEP), which prioritising this application would avoid; the points below, also add weight to the need to prioritise this application.

- The needed Improvement to the NHSE and Integrated Care Systems sector waste treatment capacity.
- The incinerator is identified as one of the four in the country key for NHS operations.
- The Trust hospital will benefit from steam and reducing reliance on boilers, hence contributing to energy-related carbon reductions.
- Incinerator Operations will also help the Trust and NHS generate income to help the hospitals and whilst treating its clinical waste onsite (saving on transport-related carbon emissions, approx. 80 hgv miles a day).

- The Incinerator is one of the key projects of the Trust's Green Plan to meet the NHS Sustainability and Net- zero target aligned with the national ambition of the UK's Net-Zero targets.
- Enhancing resilience to the Hillingdon Hospital by using steam as a primary source for heating/hot water and boilers as a backup.
- The project also meets the Social Value (a procurement assessment), which will create local jobs and new businesses in the area.

We were given a deadline of 31st July, we have all worked hard to meet EA's requirement. We appreciate if we can have decision prior to our recommissioning plan by October 23.

If you have any further questions, please do not hesitate to contact me @ Roger.scott@Medisort.co.uk.

Yours faithfully.



Roger Scott
Compliance Manager
Medisort Limited



Steve Wedgwood
Director of Estates & Facilities
The Hillingdon Hospitals NHS Foundation Trust