

Additional information request.

1. For the proposed re-packaging of hazardous waste provide a line by line assessment of how your proposed activities will be in accordance with the BAT Conclusions for Waste Treatment [CL2018D1147EN0000040.0001.3bi_cp 1..1](#).

Reason: Your response to question 22 of the Schedule 5 Notice does not provide an assessment against the Waste Treatment BATC as requested.

2. For the proposed repackaging activity, waste transfer activity and bin washing please confirm whether and how you will comply with the following: (as given in the Healthcare waste: appropriate measures for permitted facilities guidance [Healthcare waste: appropriate measures for permitted facilities - When appropriate measures apply - Guidance - GOV.UK](#))
 - Waste treatment measures;
 - Emission control measures;
 - Emission monitoring and limits measures; and
 - Process efficiency measures.

You must provide a response against each of the individual appropriate measures and if you believe the appropriate measure is not applicable please explain why they do not apply. 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, and what the alternative measures are. 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.

Reason: Your response to question 24 of the Schedule 5 Notice does not provide the assessment requested.

3. Provide an updated site layout plan drawing (003) showing the location of the APCR storage Area and the location of the Carbon Filter odour abatement unit (Marked as A3).

Reason: Your Schedule 5 Notice response states that these are marked on the plan, however the plan submitted does include these features.

4. With reference to your response to question 13 in the Schedule 5 Notice. For the wastes you are proposing accept under waste codes 19 02 99 and 19 11 99 provide further information on what these wastes are and why they cannot be classified under another code.

Reason: More information is required on these wastes.

5. Please clarify at what odour reduction efficiency level the carbon filter unit will be replaced. If necessary update the OMP with the correct efficiency level.

Reason: Your response to question 37 in the Schedule 5 Notice response states that the unit will be swapped if efficiency falls below 95%. However, the OMP (section 7.4) states this will happen if efficiency drops to 60%. Clarification is required.

6. With reference to section 7.4 of the OMP (V2). This section includes an unfinished sentence, please amend as necessary.

7. With reference to the OMP (V2). Drawings 001 and 002; and Appendix 4 EWC Lists are not included in the plan, please update the plan to include these drawings and the Appendix 4.

Reason: Whilst these are referenced in the plan they are not included.

8. With reference to your response to question 11 and Question 56 in the Schedule 5 Notice response. Amend your response to include a cost-benefit assessment that compares SNCR to SCR, to justify your choice of SNCR NO_x abatement. The assessment shall include actual cost and emission data. The following is an example of how it can be presented.

Parameter	Units	SNCR	SCR
NO _x released after abatement	tpa		
NO _x removed	tpa		
Global warming potential	T CO ₂ eq pa		
Ammonia consumed	tpa		
Total annualised cost	£ pa		

Average cost per tonne NOx abated	£ per tonne NOx		
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Reason: Your responses to these questions do not include a cost-benefit assessment using actual cost and emission data.

9. With reference to your response to question 1 in the schedule 5 notice. You have stated that the detergent used for bin washing includes UTEX. The SDS for UTEX indicates that it is a solution of Ethylenediaminetetraacetic acid (EDTA). EDTA is listed as a freshwater & estuarine specific pollutant in the EA guidance [Surface water pollution risk assessment for your environmental permit - GOV.UK](#). Please provide an assessment of the impact of this discharge in accordance with EA guidance.

Reason: Assessment required to demonstrate that bin wash effluent will not cause significant pollution when discharged to sewer.