



Non-Technical Summary



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SITE DETAILS

Murfitts Industries Ltd,
Unit 13 Slyfield Industrial Estate,
Moorfield Road,
Guildford,
GU1 1RU

OPERATOR DETAILS

Murfitts Industries Ltd,
Avenue One,
Letchworth Garden City,
SG6 2HU

PERMIT REFERENCE

EPR/WP3522SZ

DOCUMENT REFERENCE

K18.19~09~001

ISSUE DATE

16/09/2024



Wiser Environment Ltd, Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
94 Xuan Thuy, Thao Dien Ward, District 2, Ho Chi Minh City, 713385
+44 1480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

DOCUMENT CONTROL

DOCUMENT TITLE:	Non-Technical Summary
REFERENCE:	K18.19~09~001
CLIENT:	Murfitts Industries Ltd
REPORTED BY:	Wiser Environment Limited
STATUS:	Final
ISSUE:	01
ISSUE DATE:	16/09/2024
AUTHOR:	Wiser Environment Limited
APPROVED BY:	Magda Jackson – Murfitts Industries Ltd

REVISION HISTORY

REFERENCE	DATE	ISSUE:	REVISION SUMMARY
K18.19~09~001	30/08/2024	D1	Draft for client review.
K18.19~09~001	16/09/2024	01	Finalised for submission.

QUALITY CONTROL

ACTION	DATE	NAME
Prepared	30/08/2023	Elliott Howard
Checked	16/09/2024	Elliott Howard
Approved	16/09/2024	Elliott Howard

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1. INTRODUCTION

This document is the Non-Technical Summary (NTS) (K18.19~09~001) that accompanies the application for a variation to the existing Standard Rules Environmental Permit (permit reference: EPR/WP3522SZ) to a bespoke Environmental Permit.

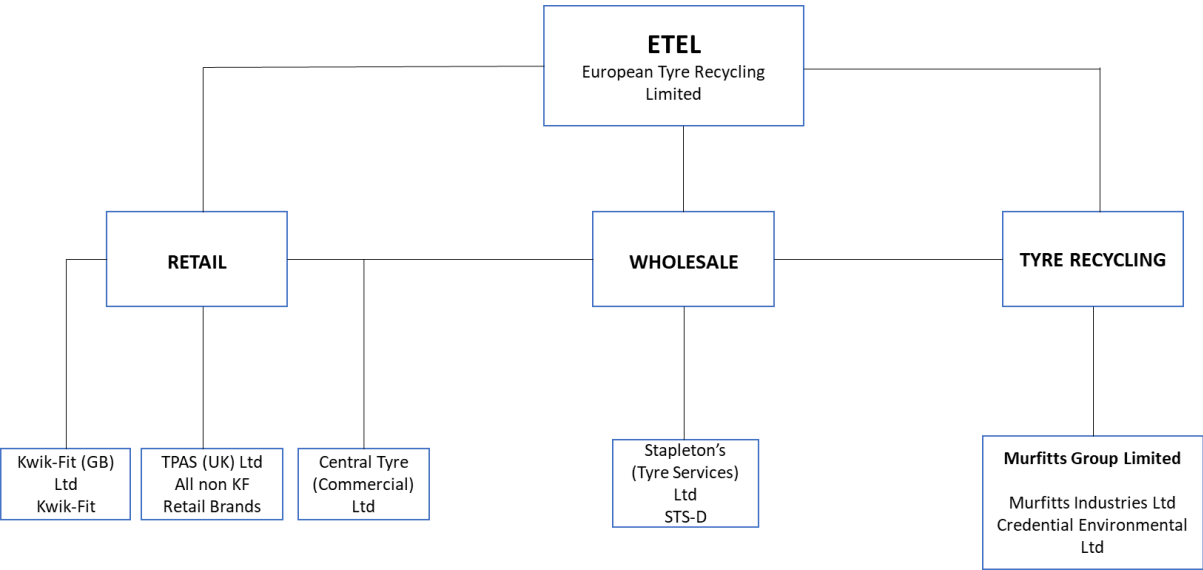
This NTS summarises the proposed activities to be regulated under the Environmental Permit and should be read in conjunction with the other supporting documents included within the application.

The variation to the permit seeks to increase the annual throughput from 5,000 tonnes to 15,000 tonnes per annum of EoL tyres, with no more than 160 tonnes of tyres stored onsite at any one time. The quantity of baled tyres has increased marginally, but this has not altered the associated environmental risk significantly given the controls in place. The primary control to allow the increased throughput of EoL tyres is the processing and treatment with greater efficiency.

The site is located at Unit 13, Slyfield Industrial Estate, Moorfield Road, Guildford, GU1 1RU, National Grid Reference SU 99920 52527.

The application has been prepared by Wiser Environment Limited, on behalf of the applicant Murfitts Industries Limited (MIL).

MIL is part of the European tyre Enterprise Ltd (ETEL) Group who are international tyre and automotive service, maintenance and repair business group that operate multiple retail brands including Kwik-Fit and Stapleton’s Tyre Services.



This site is to operate as part of a nationwide network of hubs accepting EoL tyres for storage and/or treatment (baling) before onward transfer to other permitted facilities where EoL tyres are processed and shredded. Baling operations are not currently undertaken but are to be included within this variation to allow flexibility of treatment options across the network of Hubs.

This strategic operation is ancillary to the main activity of distribution of new tyres to the retail sector in the UK and allows for a close-loop system for the tyre industry.

The Environmental Permit covers the management of EoL tyres which are collected on takeback following delivery of new tyres to retail outlets that are not part of the ETEL Group.

EoL tyres are also collected from Group retail outlets, these are handled through the same secure supply chain, and on-site process but are done so under a Non-Waste Framework Directive exemption. The NWFD exemption shall be retained as an option to cover the movements of waste between the ETEL Group.

Other hubs within the network, as they meet the appropriate location criteria, and additional annual throughput is not required, are to be operated in accordance with Standard Rules Environmental Permit (SREP) *SR2021 No 13: storage and mechanical treatment of end-of-life tyres for recovery*. The activities at the hubs are limited to either storage and onward transfer, or storage and baling prior to onward transfer, so are inherently low risk. Volumes of EoL tyres stored on site are less than 100 tonnes, and given the secure supply chain and logistics control, typically remain on site no longer than 72 hours under normal operational conditions.

The Guildford site undertakes the same activities (storage, manual sorting, and baling) as the other hubs but can't benefit from an SREP any longer owing to the need for annual throughput to increase through the site.

The processes that will be carried out at the Guildford facility are the following:

- The EoLT are delivered to the site, to the dedicated storage area for **storage** and onward dispatch to processing sites within the ETEL group.
- Some tyres will be baled before transfer to processing facilities.
- Baled EoLT are stored in the designated area, prior to onward dispatch to a permitted MIL processing facility.

All deliveries to the site are planned:

- Under normal operating conditions all EoLT received will be processed and loaded into the waiting trailer and dispatched by the end of the following working day.
- Under abnormal conditions, e.g., plant breakdown or organised shutdown, delivered EoLT will be diverted to the Murfit's Industries Limited national network of permitted facilities.

The EoLT received at the site are contained either within the delivery vehicle, in the designated storage area (loose tyres), held within the processing equipment, or a designated storage area (baled tyres).

Some loose EoLT may be located outside of designated storage areas, upon the impermeable surface as part of handling activities namely the loading, unloading and movement of waste within the site.

The facility is co-located with a strategic Stapleton's tyre distribution centre and provides a closed loop, taking back EoLT received on vehicles that have delivered new tyres, from the distribution centre to retail centres across the region.

2. APPLICATION

This application is for a variation to the existing SREP to increase the annual throughput from 5,000 tonnes to 15,000 tonnes. The permit will therefore evolve to a Bespoke Environmental Permit prepared under the Environmental Permitting (England and Wales) Regulations 2011 (as amended) for a Waste Operation.

The scope of this variation is limited to the increase of annual throughput of the facility with a minor change to storage areas on site, namely a slight increase to the baled tyres stockpile. This has been reflected on the Site Layout Plan (K18.19~20~004) and within the FPP (K18.19~09~003). The associated risk with this additional storage is not thought to have increased given controls in place, separation distances on site and efficient processing of material. The processing of material and efficient transfer from site is the primary control on the additional proposed throughput.

The Operator, Murfitts Industries Limited (MIL) is part of the European Tyre Enterprise Ltd (ETEL) Group who are an international tyre and automotive service, maintenance and repair business group that operate multiple retail brands including Kwik-Fit and Stapletons Tyre Services (STS).

Waste is delivered to site, via vehicles operated by Stapletons Tyre Services (STS) and/or MIL; waste tyres are loaded into cages while they await baling. Baled tyres are loaded onto a traction trailer and taken to a Murfitts processing hub either directly or via a hub.

Some loose EoLT may be located outside of designated storage areas, upon the impermeable surface as part of handling activities namely the loading, unloading and movement of waste within the site.

This site is to operate as an ancillary operation, undertaking storage and baling of EoL tyres before onward transfer to other permitted facilities. At these facilities EoL tyres are processed and shredded. This strategic operation allows for a close-loop system for the tyre industry, offering the service of shredding the EoL tyres to create various, non-waste product.

2.1. Site Location

The proposed site is located in the Slyfield Industrial area within Guildford (see Figure 1 below) bordered by other established industrial and commercial activities.

Jacobs Well is the closest residential area, located approximately 240 m north-west of the site although a singular residential property is located approx 70 m NNW.

The A320 is approximately 250 m west of the site, whilst the centre of Guildford is 2.6 km south of site.



Figure 1 Aerial image of the site, showing the permit boundary in green

2.2. Environmental Setting

The environmental setting of the site is summarised in Table 1. A more detailed description of the site setting can be found in the Environmental Risk Assessment (ERA) (K18.19~09~003) within Section 4 of the application pack:

Table 1 Summary of Site Setting

Receptor	Description and location
Humans and Property	The surrounding environmental setting is predominantly commercial/residential with the closest residential area located approximately 240 m North North-West of the site although a singular residential property is located approx. 70 m North North-West.
Surface Water	There are 7 records of surface water features within 2 km of the site. The closest being 200 m North North-West of the site.
Groundwater	<p>The superficial deposits identified underlying the site are designated as a Secondary A Aquifer.</p> <p>The underlying bedrock is considered a Unproductive Aquifer.</p> <p>The lies within a groundwater source protection zone III – (Total Catchment).</p>
Designated Sites	There are, in total, 5 designated sites positioned within 2 km of the proposed site. Two are Local Nature reserves (LNRs), Riverside Park and Dragons Teeth & Woodland Walk (850 m SE & 1.5 km SSE). Also within 2 km are Whitmoor Common and Thames Basin Heaths SSSI & SPA (910 m NW and 905 m WNW respectively).
Non-Statutory Designated Sites	There are 26 Non-Statutory Designated Receptors, (Site Setting Plan K18.19~20~003; Sensitive Receptors Table K18.19~11~001), within a 2 km radius of the proposed site. 19 of which are UK Biodiversity Action Plan (BAP) Sites ¹ . There are 6 Ancient Woodlands, and 1 related traditional orchard.
Geology	<p>The bedrock geology underlying the site is of a London Clay Formation.</p> <p>Superficial drift geological deposits identified on site are described as Kempton Park Gravel Member.</p>
Flooding	The site does not fall within an Environment Agency Zone 2 or Zone 3 floodplain. Site has a low probability of flooding.

¹ <https://hub.jncc.gov.uk/assets/bdd8ad64-c247-4b69-ab33-19c2e0d63736>

3. PERMITTED OPERATIONS

The site will accept, store, and treat (bale) end-of-life (EoL) tyres.

The processes that will be carried out at site are the following:

- The end of life (EoL) tyres are delivered to the site and are unloaded by hand into the baler or into cages while they await to be baled.
- the baled EoL tyres are loaded into a waiting traction trailer, for onward dispatch to a permitted Murfitts processing facility.

Some loose EoLT may be located outside of designated storage areas, upon the impermeable surface as part of handling activities namely the loading, unloading and movement of waste within the site.

Description of activities		Limits of activities
R3	Recycling or reclamation of organic substances which are not used as solvents, including composting and other biological transformation processes.	Storage prior to and post treatment. Treatment consisting only of manual sorting and baling prior to dispatch for onward recovery.
R4	Recycling or reclamation of metals and metal compounds	
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	

3.1. Waste Acceptance

The proposed annual throughput is 15,000 tonnes.

EoL tyres will enter the Guildford Hub via STS vehicles, taken directly from STS customers or customers of MIL. Upon entering site, a load is inspected against the relevant waste transfer documentation to ensure that descriptions are correct. Deliveries are pre-booked to ensure control and to reinforce the site's acceptance procedure.

Once a visual inspection has been conducted and the load accepted, they are unloaded into cages to be taken directly to the baling area or stored while they await to be baled.

Some loose EoLT may be located outside of designated storage areas, upon the impermeable surface as part of handling activities namely the loading, unloading and movement of waste within the site.

The Management System Summary (MSS) (K18.19~09~002) describes the waste acceptance procedure for the site in more details.

3.2. Waste Processing

As described EoL tyres are subject to a waste acceptance procedure and once accepted unloaded and stored within cages. Cages will either be stored in the designated area or taken directly to the waste processing area (see Site Layout Plan, K18.19~20~004).

Once processed, the bales are either loaded onto a vehicle for onward transport to a MIL processing facility or stored within the designated area on site while they await collection (see Site Layout Plan, K18.19~20~004). All tyre bales will be taken to a MIL facility for further processing.

3.3. Site Management

Operations will be overseen by Technically Competent Manager qualified through schemes approved under the Environmental Permitting (England and Wales) Regulations 2011 (as amended).

The operator shall manage and operate the activities:

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

Any person having duties that are or may be affected by the matters set out in the Environmental Permit shall have access to a copy of it.

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

Daily inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM, in accordance with Section 6.4 in the Management System Summary.

4. RISK ASSESSMENT & MANAGEMENT

An Environmental Risk Assessment (ERA) (K18.19~09~003) is included in Section 04 of the application pack. The ERA details the key management measures for the protection of the environment, with regards to emissions to surface water, groundwater, land, and air (including noise and odour).

The site is operated by Murfitts Industries Limited, a Management System Summary (MSS) (K18.19~09~002) has been developed and is included within in this application pack to reflect and control site operations, environmental management, emissions, and monitoring.

The MSS defines operational and maintenance procedures and details requirements in the event of an accident or incident. Murfitts Industries Limited's business management system is certified to ISO14001 Environmental Management and 9001 Quality Management, the intention is that this will be extended to the Guildford site subject to other business demands.