

NON-TECHNICAL SUMMARY

18 Riley Close, Royal Oak, Daventry, NN11 8QT

UK (Rubber) Recycling Ltd

Version:	1.2	Date:	09 February 2021		
Doc. Ref:	RIL-2848-C	Author(s):	CP/IA	Checked:	UKR
Client No:	2848	Job No:	001		



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Document History:

Version	Issue date	Author	Checked	Description
1.0	10/11/2020	CP	--	Internal draft
1.1	21/12/2020	CP	--	Application copy
1.2	09/02/2021	CP	--	Address change

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1 Introduction

1.1 This Non-Technical Summary accompanies the above application to operate the site at 18 Riley Close, Royal Oak, Daventry, NN11 8QT as a physical treatment facility for non-hazardous waste.

1.1.1 The site proposes to accept, store and treat the following wastes for recovery:

- End-of-life tyres (ELTs)
- Plastic
- Paper & cardboard

1.2 The site is located at 18 Riley Close, Royal Oak, Daventry, NN11 8QT, which is situated in an industrial/business area. Immediately surrounding the site are several industrial/commercial premises; the nearest residential receptors are situated 330m to the east of the site on Timken Way which are beyond two no. large industrial units.

2 Application proposals

- 2.1 UK (Rubber) Recycling Ltd will hold and operate an Environmental Permit (EP) for the acceptance, storage and treatment of End-of-Life Tyres (ELTs), paper & cardboard and plastic for recovery.
- 2.2 The throughput of the site will be limited to <75,000 tonnes per annum.
- 2.3 The Environmental Permit is required for the storage (keeping) prior to removal, and treatment of waste. The proposed waste storage and treatment processes to be carried out on site will include those shown in the table including waste recovery operations:

Table 2.1 – Permitted Operations

Description of activities	Limits of activities
<p>R3: Recycling/reclamation of organic substances which are not used as solvents</p> <p>R4: Recycling/reclamation of metals and metal compounds</p> <p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Tyre Recycling - Treatment consisting of sorting, cutting, separation, baling, shredding, compacting, bale breaking and granulating for recovery.</p> <p>Plastic Recycling - Treatment consisting only of sorting, cutting, separation, baling, shredding, bale breaking, granulating and compaction of waste into different components for recovery.</p> <p>Paper & Cardboard Recycling - Treatment consisting of sorting, cutting, separation, baling, shredding, bale breaking, granulating and compaction of waste into different components for recovery.</p> <p>Waste types as specified in the EP.</p> <p>Wastes shall be stored for no longer than 3 years prior to recovery.</p> <p>All treatment shall be carried out in a building.</p> <p>All storage and treatment of waste must take place on an impermeable surface with sealed drainage with the exception of tyre and paper bales which can be stored on hardstanding.</p>

2.4 The site will be open during the following hours for the delivery, receipt and processing of waste:

Monday to Friday	08:00 – 18:00
Saturday	08:00 – 13:00
Sundays, Bank/Public holidays	Closed

3 Proposed EWC codes

3.1 The following tables below demonstrates the proposed EWC codes to be accepted as part of the application.

Table 3.1 – Proposed EWC Codes for Physical Treatment Facility

Physical Treatment Facility	
Maximum Quantities	The total quantity of waste accepted shall be less than 25,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres
Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	waste plastics (except packaging)
07	WASTES FROM ORGANIC CHEMICAL PROCESSES
07 01	wastes from the manufacture, formulation, supply and use (MFSU) of basic organic chemicals
07 02 13	waste plastic
15	WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 05	composite packaging
15 01 06	mixed packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery)
16 01 03	end-of-life tyres
16 01 19	plastic
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 02	wood, glass and plastic
17 02 03	plastic
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising)
19 12 01	paper and cardboard
19 12 04	plastic & rubber
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES)

Physical Treatment Facility	
Maximum Quantities	The total quantity of waste accepted shall be less than 25,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres
Waste Code	Description
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 39	plastics

4 Documentation and fees

4.1 Application fee

4.1.1 Oaktree Environmental Ltd have sought guidance from the Environment Agency using pre-application advice (EPR/JB3801CX/A001) and the application fee is as shown below.

Table 4.1 – Base Application Fee Table

EPR Charging Scheme Ref	EPR Charging Scheme Ref & Description	Type of application (Ref)	Fee
1.16.12	Main Application Fee	Bespoke	£7,930
		TOTAL	£7,930

4.2 Documentation and additional charges

4.2.1 In addition to the above, as the site is accepting and storing combustible waste, the operator will be submitting a Fire Prevention Plan (FPP) and the following table sets out the additional charges.

Table 4.2 – Additional Application Fees Table - Charges for plans and assessments

General	Consideration	Document & Ref	Fee
Environmental Management System	Required due to permitted activities	RIL-2848-A	N/A
Fire Prevention Plan (Table Ref 1.19.3)	Required due to permitted activities	RIL-2848-B	£1,241
Non-Technical Summary	N/A	RIL-2848-C	N/A
Environmental Risk Assessment	Required due to permitted activities	RIL-2848-D	N/A
Site Condition Report	N/A	RIL-2848-E	N/A
		TOTAL	£1,241

4.2.2 In addition to the above table, the following forms have been submitted as part of this application:

- Application forms Parts A, B2, B4 & F1

4.2.3 Based on the above, the total fee payable to the Environment Agency on submission will be **£9,171**

4.2.4 The table below summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6:

Table 4.3 – Application Form Reference Table

Application Form	Question Ref	Page No.	Document Ref
Part A	Q5	2	2848_Director's_Info
Part B2	3B	5	RIL-2848-G
Part B2	3D	6 & 7	RIL-2848-A
Part B2	5A	7	RIL/2848/01, RIL/2848/02, RIL/2848/03 – also found in Appendices of main documentation
Part B2	5B	7	RIL-2848-E
Part B2	5C	8	RIL-2848-C
Part B2	5D	8	RIL-2848-B
Part B2	6	8	RIL-2848-D
Part F1	1 Table 1, 2 & 3	1	RIL-2848-C

4.3 **Justification for no further assessments**

4.3.1 Noise has been screened out as part of the Environmental Risk assessment and it is considered an NIA and NVMP is not required due to the following:

- The proposed treatment for this site consists of waste which will be light and will also be undertaken inside an existing building. The only external activities which will take place will be manoeuvring, loading and unloading of waste into containers for removal off site. As the site is situated on a busy Industrial Estate and there are large industrial premises situated between the site and nearest residential receptors, it is considered that the site will not generate excessive levels of noise.
- The surrounding activities will have constant vehicle movements throughout the day which would offset any noise generated by the operator's proposed operations.

- The treatment operations are carried out internally and the building has 0.6m concrete block walls and insulated cladding. The building will screen noise and reduce noise levels at the nearest receptors.

4.3.2 Based on the aforementioned mitigation measures, it has been deemed that no noise impact assessment is necessary to accompany the application.

4.3.3 In terms of odour, the site will not accept any odourous wastes and all storage of waste with the potential to cause odour will be temporarily stored inside the transfer building prior to being sorted and stored external. If any odourous wastes are present, they will be removed, rejected and stored in a sealed quarantine skip.

4.3.4 In terms of dust, all treatment of waste will take place inside the transfer building. It is considered the potential dust source is the shredding of tyres; however, the shredding system will benefit from continuous dust sprays and tyres need to be wet when treated otherwise it can cause the plant to malfunction.

4.3.5 Any shredding of waste which takes place will discharge directly into tonne bags to prevent the build up of loose waste. Any shredding which takes would be undertaken to the north of the building i.e. away from the roller shutters.

4.4 **Other considerations**

4.4.1 Initially the site will comprise an ELT baling facility as the proposed shredder is a bespoke design which will take approximately 12 months to manufacture. The Fire Prevention Plan has been based on how the site will initially operate from issue of the Environmental Permit. The addition of paper & cardboard and plastic waste types to be included on the proposed permit is a contingency measure in the event tyres cannot be exported from site due to Port closures, lack of containers and global shipping issues. This will mean the site has the ability to diversify and utilise the mobile processing equipment on site to accept other wastes for treatment to avoid a backlog of waste storage. The Environment Agency will be informed 3 months in advance of

additional waste types being accepted into the site including additional treatment operations and a revised Fire Prevention Plan will be submitted to the Local Area Team for approval.

- 4.4.2 The site will not accept mixed wastes into the site, all waste accepted will be separated at source and once accepted, be treated in a segregated area.