



Management System Summary



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SITE DETAILS

Murfitts Industries Limited
Fourth Avenue,
Letchworth Garden City,
Hertfordshire,
SG6 2TT

OPERATOR DETAILS

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

PERMIT REFERENCE

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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

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APPENDICES

APPENDIX	TITLE
Appendix A	ISO 14001 & 9001 Certificates

DRAWINGS

REFERENCE	TITLE	Rev	DATE
K18.16~20~001	Permit Boundary Plan	1	22/12/2023
K18.16~20~002	Sensitive Receptors 1 km	1	22/12/2023
K18.16~20~003	Site Setting Plan 2km	1	04/06/2024
K18.16~20~004	Site Layout Plan	3	02/09/2024
K18.16~20~005	FRS Access Route Plan	1	22/12/2023

TABLES

TABLE	TITLE
Table 1	Table of definitions
Table 2	Permitted Waste Types
Table 3	Permitted activities
Table 4	Approximate weigh/volume of materials
Table 5	Storage locations
Table 6	Notifications required by the permit

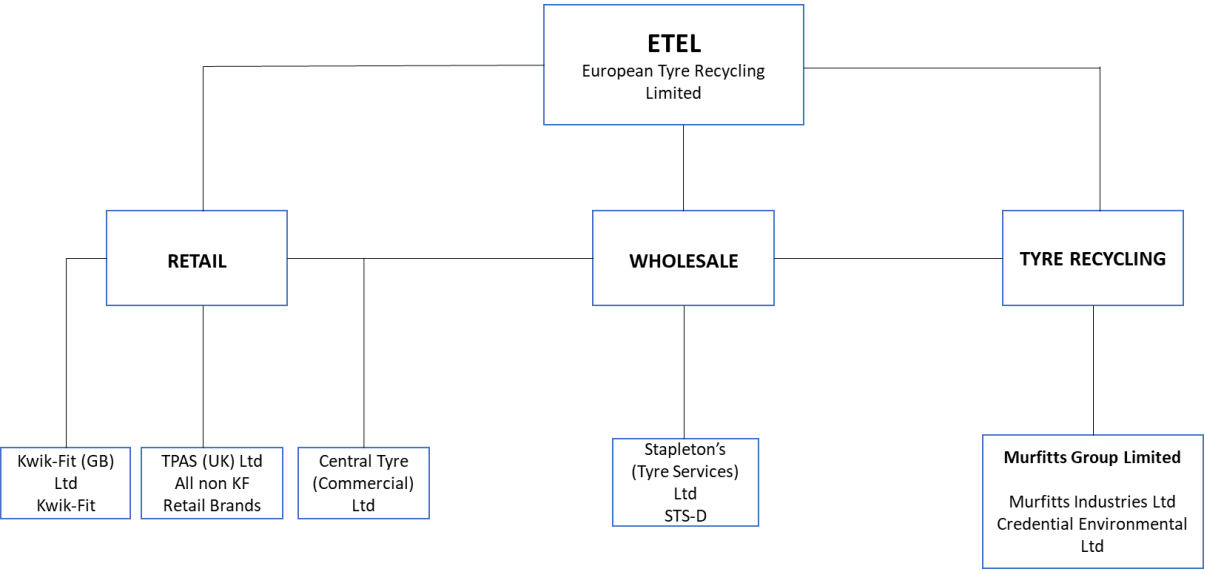
1 INTRODUCTION

This document is the Management System Summary (MSS), as required by the Environmental Permit (Condition 1.1.1), and the associated Environment Agency guidance¹. The MSS accompanies the application for a variation to the existing Standard Rules permit to a bespoke Environmental Permit.

This application is to increase the annual throughput from the existing 5,000 tonnes to 15,000 tonnes of end-of-life tyres (EWC 16 01 03) per annum, with no more than 100 tonnes held on site at any one time. The maximum stockpile size will not alter from those previously stated within the Standard Rules Permit and indicated on the Site Layout Plan (K18.16~20~003); the only amendment is to add an additional storage location, the same size as currently permitted.

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

The site is located at Fourth Avenue, Letchworth Garden City, Hertfordshire, SG6 2TT (K18.16~20~001). The site is located at National Grid Reference TL 23293 33116.



¹ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

MIL are 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 include Kwik-Fit and Stapleton's Tyre Services (STS).

This site is to operate as part of a nationwide network of hubs, an ancillary operation, accepting EoLT for storage and/or treatment (baling) before onward transfer to other permitted facilities where EoLT are processed and shredded. This strategic operation allows for a close-loop system for the tyre industry, offering the service of shredding the EoLT to create various, non-waste product.

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

- The EoLT are delivered to the site, some to the tyre bund and walking floor trailer for **storage** and onward dispatch to processing sites within the ETEL group.

All deliveries to the site are planned:

- Under normal operating conditions all EoLT received will be processed and are 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 Murfitts Industries Limited national network of permitted facilities.

The EoLT received at the site are contained either within the delivery vehicle, in the tyre bund, or held within the walking floor trailer. 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.

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.

2 SCOPE OF MANAGEMENT SYSTEM

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, treatment, and storage of waste at the Fourth Avenue site and detail the principles, infrastructure, operational activities, methods, and environmental controls.

This MSS is designed in conjunction with Murfitts Industries Limited Business Management System which is certified to ISO14001 Environmental Management and 9001 Quality Management (Appendix A), the intention is that the Portbury facility will be operated in accordance with the principles of the BMS, and relevant and common procedures.

The waste permitted to be accepted at the facility are detailed within the List of Waste (K18.16~09~002) Table 1 and Section 03 below.

The activities shall be managed and operated:

- a) in accordance with a Management System, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and closure and those drawn to the attention of the operator as a result of complaints; and
- b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environment Agency (EA) guidance, '*Develop a Management System: environmental permits*².

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

² [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

A controlled copy of the MSS will be available at Fourth Avenue, Letchworth Garden City, Hertfordshire, SG6 2TT.

MIL will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site.

The site operational procedures are under constant review and, where any changes directly impact controls set in the MSS, this will be amended and a controlled copy of the relevant section of the MSS.

The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

3 WASTE TYPE

Table 2 Permitted Waste Types.

EWC CODE	DESCRIPTION
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres

4 PERMITTED ACTIVITIES

The site operates as a waste facility in accordance with the Environmental Permitting (England and Wales) regulations (As amended) 2011.

The processes at the site are listed in Table 3 (below) with reference to Annex IIB of The Waste Framework Directive.

Table 3: Permitted activities

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 for storage 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)	

The permitted activities will occur across the site with storage in the designated area marked on the Site Layout Plan (K18.16~20~004). The method of operation is given in broader detail in Section 9 below.

This MSS details all operational procedures whether covered under the jurisdiction of the Environment Agency or not.

5 WASTE QUANTITIES

There is minimal storage of waste at this site, no more than 100 tonnes of loose EoLT will be stored on site at any one time, and typically will not remain on site for longer than 72 hours. EoLT arriving on site will be processed and removed within normal working hours.

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.

Current annual throughput is limited to 5,000 tonnes per annum; this permit variation seeks to increase to 15,000 tonnes per annum, with an additional stockpile (identical in size) added to site operations.

The following assumptions used to calculate these storage quantities are for guidance only; the actual tonnage remains the measured limit.

Table 4: Approximate weigh/volume of materials

Material/Quantity	Weight	Volume
20 Truck Tyres	1000kg	5m ³
125 Car Tyres	1000kg	6m ³

All deliveries to the site are pre-booked:

- Under normal operating conditions all EoLT received will be processed and are 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 Murfitts Industries Limited national network of permitted facilities.

The EoLT received at the site are contained either within the delivery vehicle, in the pre-process bay, or held within the processing equipment. 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.

In case of breakdown EoLT will be diverted to either STS Hubs or Murfitts Industries Limited national network of waste sites.

6 SITE ENGINEERING

The Environmental Risk Assessment (K18.16~09~003) indicates that routine waste management operations do not present a significant risk of contamination to surface water or ground water.

6.1 Site Surfaces

The areas of the site described below are shown on the Site Layout Plan K18.16~20~004.

All site surfaces are impermeable. Surfaces will be drained in accordance with Section 6.2 of this MSS.

6.2 Drainage

All treatment activities will take place on an impermeable surface. EoLT will be stored within the tyre bund on acceptance before being loaded into a walking floor trailer. Daily housekeeping prevents build of material or dust on the surface. The processing area is underlaid by a sealed drainage system. 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.

Both the tyre bund and surfaces under the walking floor trailers are facilitated by a drainage channel which flows to an interceptor prior to flowing to the main sewer for a discharge. If required flow can be halted at the interceptor to prevent discharge of contaminated waters to the mains sewer.

As a result of accident or incident, on the permitted area, further inspections will be made, and the drainage system cleaned as necessary. Any accident or incident which had the potential for significant environmental impact will be recorded and reported to the EA.

6.3 Construction Procedures and Supervisions

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil Engineer will inspect works to ensure that all necessary standards and specifications are met.

6.4 Maintenance and Inspection

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 9.9 Summary of Maintenance and Inspection Required. All defects will be reported and recorded.

7 SITE INFRASTRUCTURE

The site lies in an industrial area of Letchworth Garden City, approximately 1.7 km south-west from the centre of the town and surrounded by other established commercial properties.

The layout of the site is shown on Site Layout Plan (K18.16~20~004).

The drainage of the site is shown on Appendix B, kerbing around the perimeter seals the drainage system as well as the interceptor.

Site infrastructure comprises of the following:

- Entrance gate.
- CCTV cameras, spill kits, fire extinguishers and first aid kits.

7.1 Site Security

The site is at Murfitts Industries Limited, Fourth Avenue, Letchworth Garden City, Hertfordshire, SG6 2TT.

The permitted area of the site is approx. 0.12 ha, it forms part of a wider industrial site operated by Stapleton's Tyre Services. In summary, the security measures present are as follows:

- Perimeter Fencing
- Alarm system (via CCTV)
- 24/7 Industrial Site Security
- Gated access controlled through gatehouse

Vehicular access and egress are via the entrance on Fourth Avenue.

Treatment and storage of waste is to be undertaken 6am to 7pm (Mon-Fri) and 7am to 2pm (Saturdays). The site will be staffed during these periods and remotely monitored by a CCTV monitoring company 24 hour a day, 7 day a week, 365 days a year.

Integrity of security measures immediately around the operational area will be subject to a daily visual inspection with a more formal inspection once a week in accordance with Section 9.9 Waste Unloading and Inspection. Any defects will be recorded in the site diary and remedied in the appropriate manner.

The site is enclosed within a perimeter fence, situated in a large industrial area and benefits from 24/7 CCTV coverage with gated access.

The layout of the site is shown on Site Layout Plan (K18.16~20~004). The drainage of the site is shown on Appendix B.

7.2 Access

The site lies in an industrial area of Letchworth Garden City, approximately 1.7 km north-east from the centre of the town and surrounded by other established commercial properties.

The A1 (M) is located approximately 650 m east of the site.

It is located within the Fourth Avenue Industrial Estate, with the closest residential site approximately 400 m NNW.

7.3 Site Information

Emergency contact numbers, head office address and telephone numbers, hours of operation, a copy of the Environmental Permit Number and the Environment Agency's general enquiries and emergency contact telephone numbers will be displayed in the operational area.

7.4 Site office and Welfare

A site office is provided with electricity, telephone/internet, fire extinguishers and first aid equipment. A copy of the site's Environmental Permit and this MSS will be available within the office.

A visitor's book, site diary and accident book will be in the Site Office. The site diary, or other electronic record, will be used to record any significant event, visits by Environment Agency personnel, dates for proposed engineering works and any other important information.

7.5 Fuel and Oil Storage

Hydraulic and lubricating oils, for use within mobile plant and machinery, will be stored in appropriate containers or removed by the service engineer. The container is provided with a spillage containment tray, to prevent the leakage from the container of any materials that might

leak from any of the containers stored within it, in accordance with Oil Storage Regulations for businesses.³

Any containers stored within the site will be located away from operational and storage areas, and clearly marked with their contents and capacity. Container openings will be securely sealed before being moved around site to prevent spillages.

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

7.6 Site Services

The site will be provided with mains water, electricity, and telecoms services.

7.7 Weighbridge

Throughput of tyres will be measured through tyre counts, converting to a tonnage using the weight to volume information provided in Table 4. Weighing will occur at the destination following dispatch from site.

³ <https://www.gov.uk/guidance/storing-oil-at-a-home-or-business>

8 STAFF & EQUIPMENT

Main operational instructions of site management and operatives is given in the site MSS, and specific written instruction issued separately and to be attached to the site copy of the MSS.

Updates in training will be as necessary or when the environmental permit or site EMS brings a change to the duties of personnel.

8.1 Site Staffing

8.1.1 Management

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

Details of TCM(s) will be provided to the Environment Agency. At times where the specified TCM(s) is/are unavailable, an alternative TCM will be allocated responsibly for operations, the Environment Agency will be made aware of these changes.

Responsibilities include ensuring compliance with the Permit, ensuring compliance with the Health and Safety Policy, and liaison with the Environment Agency and other regulatory bodies. The TCM will attend site in accordance with the attendance criteria specified within the Environment Agency guidance, 'Legal operator and competence requirements: environmental permits'⁴.

8.1.2 Operations Staff

A minimum of one person will be on site at all times during operational hours. Site operatives will be responsible for controlling incoming and outgoing vehicles, inspecting waste to ensure compliance with permit conditions and Duty of Care notes, controlling vehicle movements, using site equipment and machinery, loading and unloading vehicles, ensuring good general housekeeping for the site, and reporting any issues to the TCM. Additional persons will be brought to the site when and if necessary.

⁴ [Legal operator and competence requirements: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits), updated 11 June 2019

8.1.3 Staff Training

All site staff will be given relevant training and supervision on the machines and equipment used at the site. They will also be given instruction on the relevant parts of the Environmental Permit and management system to effectively and efficiently carry out their job. Training will be documented, and records kept.

It is the responsibility of Senior Management and the Technically Competent Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

8.2 Operational Hours

Waste Acceptance & Processing

The site will be open to accept end of life tyres during the following times:

Monday to Friday	06:00 to 19:00
Saturdays	07:00 to 14:00
Sundays & Bank Holidays	Closed
Other Public Holidays	Closed

8.3 Plant and Equipment

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

All lifting equipment is periodically inspected and tested by an external auditor on an annual basis in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required.

The site is operated in accordance with written procedures incorporated within both the Murfitts Industries Limited Business Management System and this MSS.

Preventative maintenance of the process machinery will be carried out regularly to ensure that the process runs efficiently.

9 SITE OPERATIONS

9.1 Health and Safety Instruction

All visitors to the site will report to the site manager. First time visitors to the site will be required to read the displayed notice giving instruction on health and safety and site procedures.

9.2 Duty of Care

All incoming EoLT loads will be supported by appropriated documentation detailing the source location and description of the waste for Duty of Care purposes. A copy of this description will be kept at the site office.

9.3 Carrier Registration

Only registered waste carriers will be contracted to remove waste from site. The site manager will ensure that hauliers removing waste from the site are Registered Waste Carriers using standard checks. Where there is uncertainty regarding registration, a carrier will be asked to provide a validated Waste Carriers Certificate.

9.4 Waste Description

Murfitts Industries Limited accepts solely non-hazardous waste (EoLT) at Fourth Avenue, Letchworth Garden City, Hertfordshire, SG6 2TT.

All loads will be described appropriately and will only be accepted where in compliance with acceptable waste types for the site (Section 3). The site manager will ensure that delivered waste is acceptable and permitted by the Environmental Permit.

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

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9.5 Pre-Acceptance Procedure

A pre-acceptance procedure is followed in accordance with Sector Guidance Note (SGN) S5.06 *recovery and disposal of hazardous and non-hazardous waste*, section 2.1.1⁵.

The types of wastes to be accepted at the site are detailed in the List of Waste (K18.16~09~006), accompanying the application and is also stated in Section 3 of this document.

Tyres will be delivered to site through the site entrance. All loads will undergo the waste acceptance procedure prior to unloading. It is unlikely that any non-conforming loads will be present given that all loads are pre-booked, single stream, and from known locations. The supply chain is long established, and secure, originating from customers of STS or MIL.

Loose EoLT are deposited into the tyre bund while they await loading into one of the walking trailers. EoLT will be stored within these trailers whilst they await dispatch to a processing facility. Designated storage areas are indicated on the Site Layout Plan (K18.16~20~004).

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.

9.6 Waste Receipt

Tyres will arrive by vehicle to be manually unloaded by staff into the tyre bund. These shall then be loaded into a walking floor trailer whilst they await onward dispatch to a further processing facility.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

These records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

⁵ [Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sector-guidance-note-s5-06-recovery-and-disposal-of-hazardous-and-non-hazardous-waste), updated 10 October 2018

9.7 Waste Unloading and Inspection

On arrival, vehicle details will be recorded in the site diary or similar electronic record. Waste will only be accepted from companies who have provided a valid waste carrier registration and relevant Waste Transfer Note.

All loads will be pre-booked, no ad-hoc deliveries will be accepted. All loads are inspected for non-permitted wastes, quality, and conformance with Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process.

Waste deliveries will be inspected upon arrival to ensure no 'non-compliant' waste is present, and then directed to the waste reception area before loads are discharged in the designated area.

The site is operated in accordance with written procedures incorporated within the Murfitts Industries Limited Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

Any spillages will be cleared in accordance with Section 9.11 Spillages below.

9.8 Unacceptable Waste

Given the limited nature of site operations, and that EoLT are source-segregated, it is highly unlikely that unacceptable waste types will be delivered to site.

In the unlikely event that such waste does arrive, any non-conforming waste types, other than those listed in the List of Waste (K18.16~09~005), will be rejected upon visual identification.

Rejected wastes which cannot be immediately removed will be quarantined and the customer will be informed (usually via telephone/email) and arrangements will be made to remove these items from site within 5 days.

All necessary measures to ensure appropriate containment and removal from site will be observed and all agencies informed as appropriate.

9.9 Process Controls

- Site personnel are to always wear the correct PPE provided by the Company. Report any wear and tear so that it might be replaced.
- Drive around the site in accordance with site driving rules.
- Only trained operators may operate machinery on-site in accordance with operational procedures.
- Beware of your own area and others who may enter it.
- Ensure two-way radio communication with others is operational.
- Engage positively with these rules and if unsure contact your Line Manager.

9.10 Spillages

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

9.11 Waste Dispatch

Any tyres leaving site will be accompanied by a written description and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, in this case Murfitts re-processing facilities.

10 WASTE STORAGE & HANDLING

10.1 Storage Areas

Under normal site operations storage of tyres will take place for no longer than 72 hours on site. No treatment is undertaken on site, EoLT are only stored whilst they await dispatch to a further processing facility.

Storage locations are identified on K18.16~20~004 Site Layout Plan.

Table 5 Storage locations

MATERIAL	LOCATION	HOW IT IS STORED	VOLUME (M ³)	MAX. TIME IT WILL BE STORED
Loose EoL Tyres	Loose EoLT areas (bund)	Whole, loose, within bays	173 m ³ (volume of each stockpile)	72 hours

Tyres are stored no longer than 72 hours in either storage location. Details of fire prevention is included in the Fire Prevention Plan (K18.16~09~002) and supported in the Site Layout Plan (K18.16~20~004).

A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival;
- Producers' details;
- Previous holders;
- A unique reference number;
- Intended treatment/recovery route;
- Accurate nature and quantity of waste, including hazards; and
- Storage location.

All records are maintained for a minimum of 2 years following recovery or disposal.

10.2 Tyre Handling

Tyres will be unloaded into the tyre bund before they are loaded into a walking floor trailer whilst they await onward dispatch from site. Designated storage locations are indicated on the Site Layout Plan (K18.16~09~004).

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.

11 WASTE TREATMENT & TRANSFER OPERATIONS

11.1 Storage & Transfer

EoLT are delivered to site and following pre-acceptance procedures are stored within the tyre bund and consequently walking floor trailers whilst they await dispatch to a suitably permitted facility.

All site treatment processes are undertaken in accordance with relevant elements of Sector Guidance Note (SGN) S5.06 *recovery and disposal of hazardous and non-hazardous waste*.

- Waste duty of care information will be inspected and recorded;
- Loads will be directed to the waste acceptance area (site surface and infrastructure) and will be stored within the designated storage areas.
- 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.
- Loose EoLT are stored within the tyre bund areas, approximately 10 m x 7.5 m x 2.3 m for each stockpile.
- Waste storage maximum duration of 72 hours.
- Site staff will carry out regular waste storage location inspections.
- Waste will be treated using the First In, First Out (FIFO) principle; and dispatched using the same principle.

12 ACCIDENT & INCIDENT MANAGEMENT

The Environmental Risk Assessment (K18.16~09~003) for the Letchworth site identifies foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K18.16~09~003), where management procedures and controls are identified to reduce any identified risk.

Any accident or incident that has caused, is causing, or may cause significant pollution will be recorded, and the Environment Agency notified as soon as practicable.

These will be investigated by a senior manager and where action is identified as being required, this will be recorded; responsibility will be allocated; preventative or corrective actions specified, and completion required within a defined timeframe.

Control measures detailed within the ERA include:

- Site is secured by fencing and gated and CCTV is monitored externally 24/7;
- Regular monitoring of weather warnings/flood alerts/EA warnings.
- All vehicles delivering waste will abide by on-site speed limits and road markings.
- Waste deliveries and site operations shall be overseen by the Technically Competent Manager or nominated competent person;
- Unloading of waste will only be undertaken in designated areas;
- 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.
- Treatment activities will be undertaken on an impermeable surface with sealed drainage;
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Fuelling of plant is to be undertaken on an impermeable surface with a suitable spill kit and fire extinguisher available.
- The site will be managed in accordance with the minimum operating standards detailed in the Fire Prevention Plan (K18.16~09~004).

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

13 ENVIRONMENTAL CONTROLS

13.1 Dust Control

Overall risk: Low

Residual risk (after application of management measures): Low

The control measures to manage dust and fugitive emissions are detailed in the Environment Risk Assessment (K18.16~09~003) Section ERA8.

All vehicles delivering and collecting materials are to be containerised and limited to a maximum speed of 10 mph. There will be daily maintenance inspections of storage areas and buildings, with vehicles, plants and machinery being operated and maintained in accordance with manufacturers specifications or annually, whichever is more frequent. All these events will be recorded in the site diary.

Operations which may give rise to dust emissions will not be carried during strong windy conditions. All plant based on site would be equipped with upward facing exhausts and all dust control systems will be routinely maintained and serviced on all plants and machinery.

Internal haul routes would be constructed and maintained to minimise dust. The roads and circulation areas will be dampened down in periods of dry weather by spraying water.

13.2 Litter Control

Overall risk: Low

Residual risk: Low

The control measure to manage littering are detailed in the ERA (K18.16~09~003) Section ERA9.

Due to the type of waste received the likelihood of litter generation is very low. Where litter is generated, the following measures are employed.

The site is subject to regular housekeeping to suppress litter generation, staff are required to litter pick on a 'see it, pick it up' basis.

Where litter is identified as a nuisance on the site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

13.3 Pests, Vermin, Birds

Overall risk: Low

Residual risk: Low

Due to the type of waste received the attraction and harbouring of pests, vermin or birds is very low. The control measures to manage Pests, Vermin and Birds are detailed in the ERA (K18.16~09~003) section ERA10.

All reasonable measures will be taken to prevent and minimise the occurrence of pests. Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

13.4 Mud & Debris

Overall risk: Medium

Residual risk: Low

The control measures to manage mud and debris fugitive emissions are detailed in the Environment Risk Assessment (K18.16~09~003) section ERA11.

Vehicles will be visually inspected before leaving the site and advised if there is a need to clear or remove mud or debris. The site itself will also be cleaned as necessary by site personnel to prevent off site mud or debris deposits. Regular housekeeping of all areas will be undertaken on a weekly basis to maintain cleanliness.

13.5 Water

Overall risk: Medium

Residual risk: Low

The control measure to manage the risk of contaminated water run-off are detailed in the ERA (K18.16~09~003) Section ERA12.

The likelihood of significant contaminated run-off is negligible as liquid waste is not permitted on site, and the storage of EoLTs will be undertaken on an impermeable surface within a sealed drainage system.

13.6 Noise & Vibration

Overall risk: Medium

Residual risk: Low

The Environment Risk Assessment (K18.16~09~003), section ERA14, identifies the risk and control measures for noise and vibration.

The site is located within a large industrial area, as shown in the Sensitive Receptors Plan (K18.16~20~002), and operations are only carried out within permitted hours, thus there will not likely be a higher noise level generated in relation to the surrounding area. Given no treatment activities are undertaken the associated risk of noise is very low.

All vehicles, plants and machinery will be inspected and maintained regularly in line with maintenance schedule set out by the manufacturer's specifications.

14 EMISSIONS AND MONITORING

There are no point source emissions identified which may cause significant risk.

Appropriate measures have been taken to control emissions of substances not controlled by emissions limits.

15 CLIMATE CHANGE

Climate change may increase risk of uncontrolled emissions or smoke and fire water; increase in waste reactions or fires involving heat sensitive or combustible waste; and increase in high temperature expansion and stress of plant, pipework and fittings. There is also a risk if UV degradation of plastic pipes and hoses causing them to fail; increased dust emissions from processing areas (risk of reduced water availability for dust suppression); and potential increased risk of wildfires impacting the site.

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K18.16~09~003), where management procedures and controls are identified to reduce identified risk.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

15.1 Temperatures

Temperature fluctuations are unlikely to impact the current waste stream accepted on to site. If the waste streams change then this will be re-assessed.

15.1.1 Summer

The potential for fire if the temperature exceeds the heat rating for the EoLT, the potential for UV degradation, waste reactions, increased dust emissions, drought, wildfires and risk of pests and scavengers have all been considered, along with the quick turnaround times of the EoLT on site.

The appropriate mitigations can be found in the Fire Prevention Plan (K18.16~09~004), and the Environmental Risk Assessment (K18.16~09~003).

15.1.2 Winter

The potential for odour complaints and pest infestations in warmer winter temperatures have been considered and appropriate mitigations can be found in the Fire Prevention Plan (K18.16~09~004), and the Environmental Risk Assessment (K18.16~09~003).

The risk of freezing pipes in response to lower winter temperature has also been considered in the Fire Prevention Plan (K18.16~09~004), and the Environmental Risk Assessment (K18.16~09~003).

15.2 Rising Sea Levels

An isolated pond is situated approximately 120 m west of site.

The proposed site is positioned 1.4 km from the closest river, Pix Brook which is its closest water source. The site is located in a Very Low Risk Flood Zone for both fluvial and pluvial processes (Environmental Risk Assessment - K18.16~09~003).

15.3 Changes in Rainfall Patterns and Intensity

The potential for increased site surface water and flooding have been considered and mitigated for in the Environmental Risk Assessment (K18.16~09~003), which considered the site's drainage system which is designed to cope with rainfall at high intensity and an increased frequency. The drainage systems will be inspected and maintained regularly.

15.4 Heat Waves

Long periods of hot and dry weather have been considered, with cooling systems, emergency water usage and fire prevention plan all in place as shown in the Fire Prevention Plan (K18.16~09~004), and the Environmental Risk Assessment (K18.16~09~003).

15.5 Storms

The potential for high winds causing damage to buildings, infrastructure and plants will be mitigated by regularly surveying of the sites infrastructure quality and keeping up-to-date with all EA and Government weather reports (Environmental Risk Assessment - K18.16~09~003).

16 COMMUNICATION

16.1 Complaints

All complaints received concerning the permitted site will be dealt with in accordance with the existing complaints procedure in the Management System.

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent fugitive emissions.

The details of the complaint and any subsequent investigation will be recorded in a Complaint Form or other format recording relevant information.

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint and where substituted swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

16.2 Non-conformances, Corrective & Preventative Actions

Any non-conformances recorded by the TCM or the Environment Agency will be actioned in a timely manner or in line with an appropriate time scale set by the Environment Agency.

Non-conformances will be remedied so that the operation that led to the non-conformance is prevented or changed, to ensure compliance with the environmental permit.

Corrective actions will be recorded in the site diary.

17 DOCUMENTS & RECORDS

17.1 Records & Reporting

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site Management System Summary and all associated documents;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Condition	Requirement	Record
1.1	Records to demonstrate activities are managed in accordance with a written management system.	This Management Plan and associated management system documents.
1.1	Records to demonstrate activities are managed by sufficient competent persons and resources.	Evidence of technical competence. Staff training records.
2.3	Records of all waste accepted on site.	Duty of Care Waste Transfer Notes.

Condition	Requirement	Record
4.2	<p>A quarterly summary report relating to the site and the waste accepted and removed from it during the previous quarter.</p> <p>Q1 Jan – Mar by 30th April</p> <p>Q2 Apr – Jun by 31st July</p> <p>Q3 Jul – Sep by 31st October</p> <p>Q4 Oct – Dec by 31st January</p>	National Operator waste return ⁶

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

17.2 Notification

Notification condition specifies under what circumstances the Environment Agency must be notified. Whilst the table below summarises these, reference should always be made to the current Environmental Permit to confirm exact requirements.

⁶ <https://www.gov.uk/guidance/national-operator-waste-returns>

Table 6: Notifications required by the permit

Condition	Requirement	When
4.3.1	Detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.	Without delay using Schedule 5 Form
4.3.1	Any breach of a limit specified in these standard rules.	
4.3.1	Any significant adverse environmental effects.	
4.3.3	Changes to the operator's trading name, registered name or registered office address.	Within 14 days
4.3.3	Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.	Within 14 days
4.3.4	Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations	Within 14 days – notification should contain a description of the proposed change in operation.

17.3 Security

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

17.4 Availability

In accordance with the condition requiring records to be kept, all records required under the terms of the Permit shall:

- Be legible;
- Be made as soon as reasonably practicable;
- If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- Be retained, unless otherwise agreed with the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until Permit surrender:
 - off-site environmental effects; and
 - matters which affect the condition of land and groundwater.

All records, plans and the management system required to be maintained by the Permit shall be held on site.

18 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

19 SITE CLOSURE

Following cessation of operations on site, Murfitts will clear the site of all waste materials, clear any drainage systems, and remove plant, equipment and any installed infrastructure.

They will plan for the closure of the site through maintaining records of waste inputs, site development and maintenance. Following any pollution incidents, records of actions taken, any remedial works, and verification reports undertaken shall be kept, as well as any monitoring results.

To evidence that the site operation has not caused a detrimental impact to the surrounding environment, the information collated during the lifetime of the permit will be utilised to prepare the permit surrender.

20 AVAILABILITY OF MANAGEMENT SYSTEM

All site operational staff will be trained in the contents of the Management System to ensure compliance and consistent operation of the site.

A copy of the Management System Summary and all associated documents will be made available at the Company's main office for reference purposes and is available on request to interested parties.



Helping clients prosper through compliance

Suite 11 Manor Mews, Bridge Street, St Ives, PE27 5UW
01480 462 232 | www.wiserenvironment.co.uk | info@wisergroup.co.uk

