



Non-Technical Summary



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SITE DETAILS

Murfitts Industries Ltd,
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OPERATOR DETAILS

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PERMIT REFERENCE

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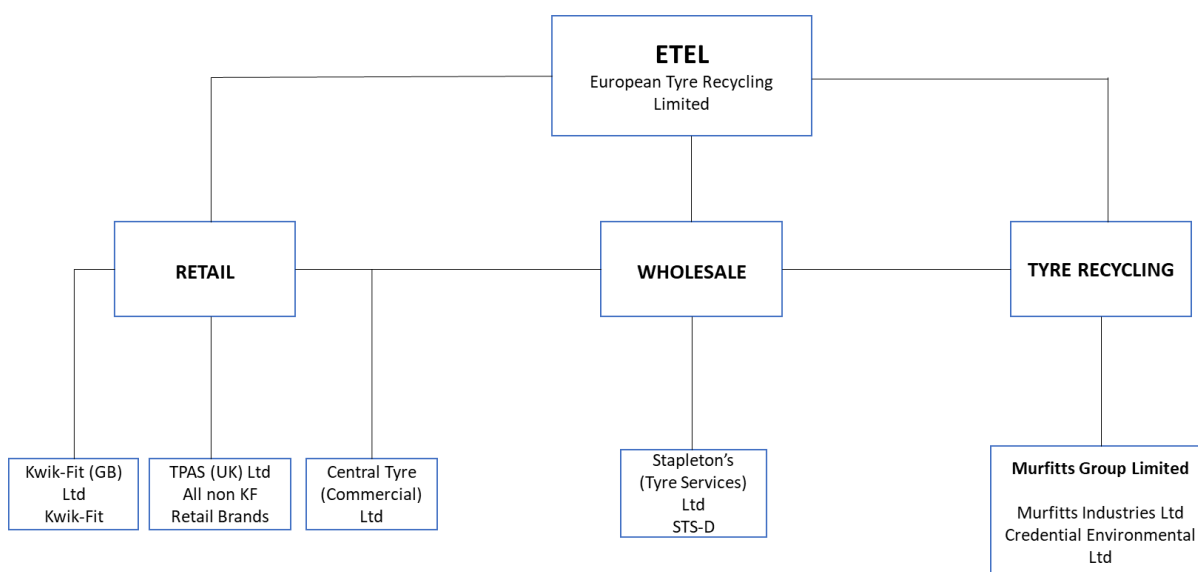
1. INTRODUCTION

This document is the Non-Technical Summary (NTS) (K18.16~09~001) that accompanies the application for a variation to the existing Standard Rules Permit (EPR/VP3722SV) to a Bespoke Environmental Permit in order to increase the annual throughput limit.

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).

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. At the Letchworth facility no treatment of EoLT is undertaken, tyres merely enter site and are stored prior to dispatch to another processing facility operated by the ETEL Group.

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.

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 Letchworth site undertakes the same activities (storage and manual sorting) 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 Letchworth facility are the following:

- The EoLT are delivered to the site, some to the tyre bund and trailer for **storage** prior to 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 (loose tyres) 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.

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.

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 an additional bay duplicating the existing stockpile. This has been reflected on the Site Layout Plan (K18.16~20~004) and within the FPP (K18.16~09~003). The associated risk with this additional storage is not thought to have increased given controls in place, fire walls 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 either STS or MIL; waste tyres are placed into a bund while they await loading into a walking floor trailer prior to onward dispatch off site. 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 EoLT 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 an established industrial area due east of Letchworth Garden City (see Figure 1 below) bordered by other established industrial and commercial activities.

The closest residential area is located approximately 475 m west-south-west of the site.

The A1 is approximately 600 m east of the site, whilst the centre of Letchworth Garden City is approximately 1.5 km west of site.

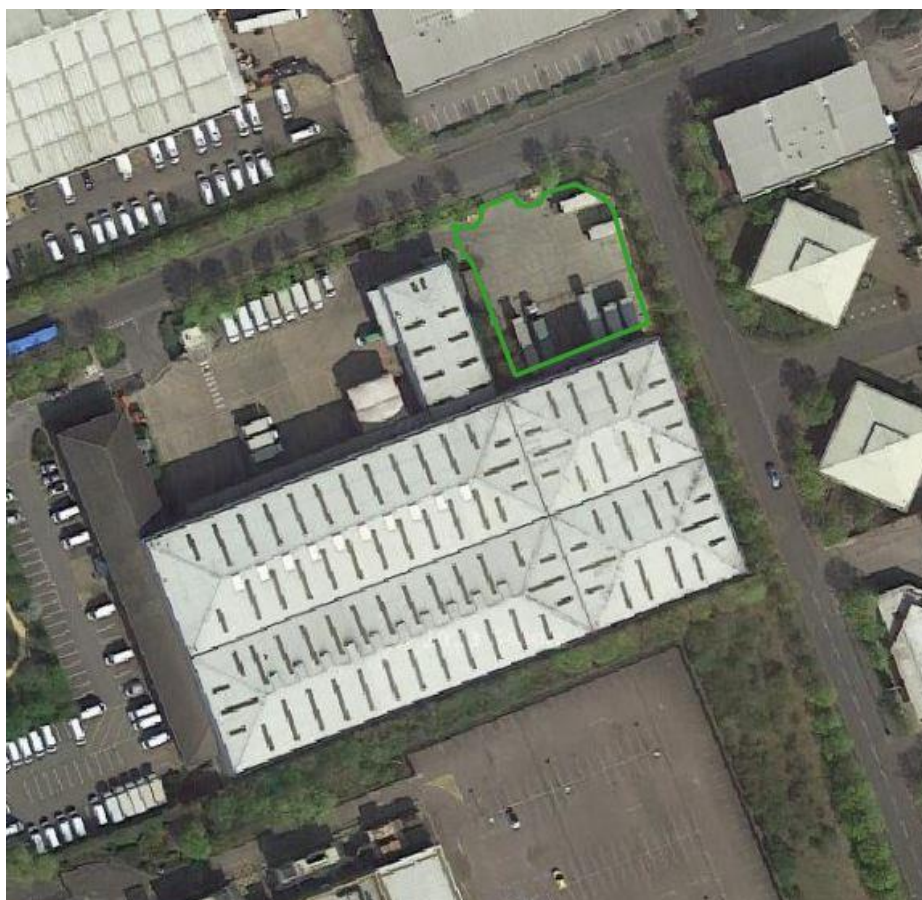


Figure 1 Aerial image of the site, showing the permit boundary in green

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) (K18.16~09~003) 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	No records of a superficial aquifer are identified on site. The underlying bedrock is considered a Principal aquifer. The lies within a groundwater source protection zone III – (Total Catchment).
Designated Sites	There are, in total, 3 designated sites positioned within 2 km of the proposed site. All three are Local Nature Reserves; Norton Common (1.2 km, W), Ivel Springs (1.3 km, NNE) and Weston Hill (1.6 km, ESE).
Non-Statutory Designated Sites	There are 13 Non-Statutory Designated Receptors, (Site Setting Plan K18.16~20~006; Sensitive Receptors Table K18.16~11~001), within a 2 km radius of the proposed site. All 13 of which are UK Biodiversity Action Plan (BAP) Sites ¹ .
Geology	The bedrock geology underlying the site is of a Holywell Nodular Chalk and New Pit Chalk Formation. Superficial drift geological deposits identified on site are described as Unproductive.
Flooding	The site falls within Flood Zone 1 and is at a Very Low risk of flooding from rivers and sea.

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

3. PERMITTED OPERATIONS

The site will accept and store 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, placed into the tyre bund by the driver before being loaded into a walking floor trailer by JCB or by hand. These are stored while they await dispatch to an onward 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 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)	

3.1. Waste Acceptance

The proposed increased annual throughput is to raise the limit to 15,000 tonnes from 5,000 tonnes.

EoL tyres will enter the Letchworth 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 the tyre bund before loaded into the walking floor trailer for onward dispatch. 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) (K18.16~09~002) 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 into a tyre bund temporarily prior to loading onto a walking floor trailer. Tyres will be stored in the designated areas as 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.

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) (K18.16~09~003) 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) (K18.16~09~002) 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.