PREMIER TYRES

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End of life tyre collection and recycling service

PERMIT APPLICATION NO: EPR/

SITE ADDRESS: Premier Tyres, Unit B1 & B2 Atlantic Works, Oakley Road, Southampton, SO16 4LL **DOCUMENT REFERENCE NO:** PT-EMS-V1

PREPARED FOR: Alan Skinner Trading as Premier Tyres

DATE: 19/02/2026

ENVIRONMENTAL MANAGEMENT SYSTEM

Version 1.0

SETTING OUT REPORT

This Environmental Management System document has been prepared by Enviroawards Limited on behalf of Alan Skinner (the Client) for the preparation and submission for an Environmental Permit in support for the legal operation of waste tyre treatment facility. A high level of skill, care, attention and diligence, taking account of the timescales and resources devoted to it by agreement with Premier Tyres as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

Information reported herein may be based on the interpretation of public domain data collected by Enviroawards and/or information supplied by the Client and/or its other advisors and associates. All information and data have been accepted in good faith as being accurate and valid.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment

EMS V1

Contents Page

Version	Reason for Revision	Date of Revision	Reviewed By	Approved By
1.0	First Version of the new EMS document drafted and released to Premier Tyres for review	First Draft 19/02/2026	R.O'Brien	
1.1	Final Version of the EMS to be submitted for EP Application	Submission Date		
2.0				
3.0				
4.0				

1. Introduction

This Environmental Management System (EMS) has been prepared in accordance with Environment Agency (EA) guidance 'How to Develop a Management System' https://www.gov.uk/guidance/develop-a-management-system-environmental-permits
The EMS sets out best practice for operating the site based on legislation and appropriate measures adopted within the industry. The Operator is Alan Skinner, Trading as Premier Tyres (hereinafter referred to as *Premier Tyres*), and this EMS is in support of a bespoke Environmental Permit at Unit B1 & B2 Atlantic Works, Oakley Road, Southampton, SO16 4LL for the legal was operation under Environmental Permitting (England and Wales) Regulations 2016 (as amended). The Application Site is centred on OS Grid reference SU 39087 13854 and the site location is shown in drawing 1. A boundary plan is shown in drawing 1 & 2. The document will be reviewed on an annual basis, or as a result of but not limited to any of the following circumstances, and updated where necessary:

- A change to an operational process;
- A significant substantiated complaint;
- A significant incident on site;
- A change to any legislation or guidance documents applicable to the waste facility; or Issuance of a varied environmental permit by the EA.

This EMS document is supplemented by the following information/documents (with accompanying plans and drawing)

- Environmental Risk Assessment, describing the environmental risks associated with the activities and the mitigations in place for each of these, including details and maps showing sensitive receptors.
- Fire Prevention Measures. The fire prevention measures in the sites standalone Fire Prevention Plan fulfil the Environment Agency objectives to: (a) minimise the likelihood of a fire occurring; (b) aim for a fire to be extinguished within 4 hours; and (c) minimise the spread of fire within the site and to neighbouring sites.
- Evidence of technical competency confirming the details of the trainee technically competence manager of the facility.
- The Site plan showing the proposed permitted area and activities and for the extended area.
- Sensitive Receptors plans (1 km) radius from the site.
- Site Condition Report showing the historical land use and baseline pollution records

The Operator intends to carry out waste activities involving the receipt and transfer of End-of-Life Tyres. The waste will be collected from a number of producer sites and delivered to the Application site in appropriate vehicles by suitably registered waste carriers. The operator has its own fleet of lorries which is operated under a restricted O-License. Once received on the Application Site the waste will be stored pending treatment (baling) for onward disposal/recovery off-site at other suitably permitted facilities. The activities will take place under cover and on impermeable surfaces

The objectives of this Environmental Management System are to:

- Identify and minimise the risk of pollution, including those that may arise from the intended operations, maintenance, accidents, non-conformances and complaints

- To identify all site operations and waste management activities
- To ensure environmental risk assessment are conducted and properly managed
- Provide recommendations for the management of potential environmental impacts
- To implement the Waste Hierarchy
- Produce a documented system by us for the Client and the Environment Agency

The scope of work for the production of the Environmental Management System (EMS) has included the following:

- Carry out a review of the environmental setting of the Application Site and surrounding area in order to determine any potentially significant pollution linkages associated with the site in its current condition
- Identification of any environmental impacts resulting from the proposed operations
- Detailing all potential pollutant linkages
- Preparation of documented management system and procedures

1.1 Environmental Permit

Table 1 Permitted Activities

Permitted Activities	
Description of Activities	Limits of Activities
R3 – recycling and reclaiming organic substances which are not used as solvents R4 – recycling and reclaiming metals and metal compounds 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)	**(a)** No more than 21,000 tonnes of waste shall be accepted each year **(b)** No more than 100 tonnes of waste shall be stored at any one time **(c)** No waste shall be kept at the site for longer than 3 months

The only permitted waste will be End-of-Life Tyres 16 01 03. The Permit will not allow any point source emission into surface waters or groundwater. However, under the emissions of substances not controlled by the emission limits rule:

- Liquids may be discharged into a sewer subject to a consent issued by the local water company.
- Liquids may be taken off-site in a tanker for disposal or recovery.
- Clean surface water from roofs, or from areas of the site that are not being used in connection with storing waste, may be discharged directly to surface waters, or to groundwater by seepage through the soil via a soakaway.

The site maintains the following distances from certain types of sensitive areas and sites:

- 200 metres of a European site, Ramsar, Site of Special Scientific Interest or Marine Conservation Zone
- 50 metres of any well, spring or borehole used for the supply of water for human consumption, including private water supplies
- a groundwater source protection zone 1

The site does however fall within 50m (specially 10m) of the following

- BAP – Broadleaf woodland of priority habitat which is under a biodiversity action plan which falls under protected habitats and ancient woodland

1.2 Site Location

The site is located at Unit B1 & B2 Atlantic Works, Oakley Road, Southampton, SO16 4LL The National Grid Reference (NGR) for the site is SU 39087 13854 and the site location is illustrated on Drawing 01. The site is located in a mixed-use area. The closest residential receptors lie within Regents Park, approximately 45m East from the site. The main access to the site is via Oakley Road. The EP boundary and site layout is shown in the accompanying site plan. The location of the site is shown in the accompanying material on sensitive receptors and location. The land uses surrounding the site are shown in Table 1-2 below

Table 1-2 Surrounding Land Uses

TYPE OF RECEPTOR	ID #	DESCRIPTION	DISTANCE FROM BOUNDARY (M)	DIRECTION
		SITE		
HUMANS AND PROPERTY	-	Site Workers	On site	-
	-	Site Visitors	On site	-
		COMMERCIAL		
	1	Remaining Units at Former Atlantic Works off Oakley Road	0 m	N, E, S
	2	Superstore off Oakley Road (Tescos)	56 m	WNW
	3	Multiple Units off Victor Street	686 m	ENE
	4	Multiple Retail Units off Auckland Road	689 m	SW
	5	Multiple Retail Units off Regents Park Road	711 m	SE
		RESIDENTIAL		
	1	Residents of Regents Park	45 m	E
	2	Residential Properties south of Oakley Road	90 m	S
	3	Residential Properties south of Cumbrian Way	105 m	SW
	4	Residential Properties north of Oakley Road	294 m	WNW
	5	Residential Properties north of Redbridge Hill	401 m	NNW
	6	Residential Properties north of Romsey Road	482 m	NE
	7	Residents of Maybush	523 m	NNE
	8	Residents of Milbrook	612 m	SSW
	9	Residential Properties west of Wimpson Lane	649 m	ENE
	10	Residents of Shirley	653 m	E
		ROADS & RAILWAYS		
	-	A35	20 m	W
	-	Oakley Road	80 m	SSW
	-	A3057	510 m	NE
		PUBLIC USE		
	1	Oakley Road Allotment Gardens	90 m	SSW
	2	Western Community Hospital	136 m	NNW
	3	Regents Park Community College	177 m	E
	4	Southwells Farm Allotment Gardens	397 m	SSW
	5	Mason Moor Primary School	462 m	WSW
	6	Paignton Road Allotment Gardens	489 m	WNW
	7	Tanners Brook Junior School	574 m	SSW
	8	Broowdale Road Allotment Gardens	749 m	WNW
	9	Newland Primary School	765 m	WNW
	10	Foundry Lane Primary School	826 m	ESE
	11	Shirley Warren Primary School	830 m	NNE
	12	Shirley Pond Allotment Gardens	850 m	NNW
	13	Wordsworth Primary School	943 m	ENE
		RECREATIONAL		
	1	Sports Complex off Oakley Road	263 m	ESE
	2	Shirley Pond Park	760 m	NE
	3	Green Park	826 m	WSW
WATER		**SURFACE WATER**		
	-	Tanners Brook	36 m	E
	-	Shirley Pond	523 m	NE
		GROUNDWATER		
	-	Bedrock Geology - Secondary Aquifer	On site	-
	-	Superficial Layer - Secondary Aquifer	On site	-
ENVIRONMENTALLY SENSITIVE		**DESIGNATED SITES**		
	1	AQMA - Southampton Council No.6 at Romsey Road	396 m	NNE
	2	AQMA - Southampton Council No.5 at Redbridge Road	960 m	SSW
		NON-DESIGNATED SITES		
	1	BAP - Deciduous Woodland off Tanners Brook	10 m	W
	2	BAP - Deciduous Woodland off Clifton Road	228 m	SE
	3	BAP - Deciduous Woodland at Shirley Pond park	504 m	NNE
	4	BAP - Deciduous Woodland off Holly Brook	853 m	NE
		HERITAGE SITES		
	1	Grade II Listed Feature - Entrance Gate at Thorners Care Home	566 m	ESE
	2	Grade II Listed Feature - Drinking Fountain at Windsor Castle (Public House)	708 m	ENE
	3	Grade II Listed Building - The Crown (Public House)	773 m	E
	4	Grade II Listed Building - Church of The Holy Trinity	950 m	SSW

1.3 Report Structure

This report describes the operating techniques that will be implemented at the facility to ensure compliance with the conditions of the environmental permit. The report has been drafted to satisfy the requirements of EA Guidance and is divided into the following Sections.

- Section 1 Introduction
- Section 2 Management
- Section 3 Accident Prevention and Management Plan
- Section 4 Operations and Activities
- Section 5 Waste Pre-Acceptance and Acceptance
- Section 6 Emissions and Monitoring
- Section 7 Information

1.4 Site Operating Procedures

Premier Tyres has a number of Site-Specific Operating Procedures (SOPs) that have been included as Appendix 01 documents. These procedures complement this overarching document and should be read in conjunction with the relevant sections.

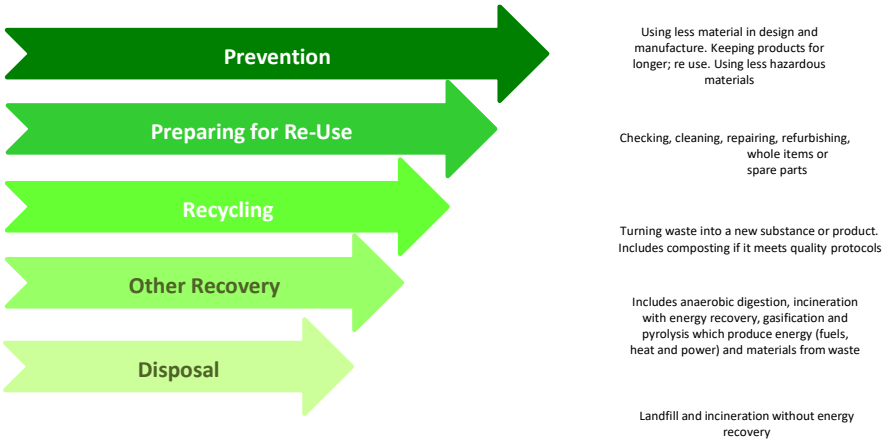
1.5 Document Revision History

Any changes to the EMS will be labelled in chronological order and the date of the change recorded. All records of the changes will be listed in the revision history in Table 1 on page 3 of this EMS (example of table below):

Version	Reason for Revision	Date of Revision	Reviewed By	Approved By
1.0				
1.1				
2.0				
3.0				
4.0				

1.6 Waste Hierarchy

Appropriate measures will be taken against pollution and specifically that the production of waste is avoided. The Operator understands and is committed to the implementation of the waste hierarchy. All measures will be taken to reduce the environmental impact of site operations and to seek options to prevent, minimise and recycle wastes where possible.



The waste hierarchy gives top priority to the prevention of waste in the first instance. It then gives priority to re-use, recycling and recovery with the least desirable option to dispose of waste to land (which the operator would be unable to do due to the Landfill Directive prohibiting waste tyres to land).

The aim of the waste treatment undertaken at the Site is to grade and bale waste. Baled tyres are then forwarded to the most appropriate facility for recycling or other recovery. The Operator will make all efforts to implement the waste hierarchy.

All waste tyres that enter the site will undergo systematic inspection to confirm whether or not it meets end of waste where the operator can evidence compliance with Motor Vehicle Tyres (Safety) Regulations 1994. Failing re-use the tyres will be inspected to for quality to check if it can be sent for re-treaded. Failing this, the tyres will either be repurposed e.g. sheared or bailed (or both depending on the end use case e.g. Recovery.

2. Management

This bespoke EMS will be implemented on site by Premier Tyres staff which ensures that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the management system;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

Premier Tyres is committed to continual improvement, to minimising the impact of the site activities on the environment and to complying with relevant legislation and other requirements to which the company subscribes. This document outlines the operating techniques at the site and demonstrates conformance with the requirements of relevant and published EA Guidance.

2.1 Management Structure and Responsibilities

The Site Manager (overseen by the Technically Competent Manager (TCM)) is responsible for day-to-day operations, compliance with the EMS and the EP. The Environmental Permit will be included in

Appendix 02. All site employees are to report to the TCM and are closely involved in all site matters and for first-line risk management at the site.

Whenever the site is open to receive or despatch wastes, or to carry out any of the waste management operations, it is supervised by at least one member of staff who is suitably trained and fully conversant with the requirements of the environmental permit regarding:

- Waste acceptance and control procedures;
- Operational controls;
- Pollution prevention controls
- Maintenance;
- Record-keeping;
- Emergency action plans; and
- Notifications to the EA

2.2 Technical Competence and Training

The site will be managed by sufficiently trained staff who are competent to operate the site. Premier Tyres training procedure, record sheet and matrix are included as Appendix 03 Training Matrix. A fully trained member of staff is on site at all times during waste acceptance hours, in order to provide supervision for waste acceptance. This staff member is fully conversant with the waste acceptance procedure, EP and contents of this EMS.

Premier Tyres EMS and training procedures ensure the following:

- All staff have clearly defined roles and responsibilities;
- Records are maintained of the skills required for each post;
- Records are maintained of the training and relevant qualifications undertaken by staff to meet the requirement of each post; and
- Operations are governed by standard operating procedures and instructions.

Operations at the site will be under the overall control of a technically competent manager (TCM) who will hold the relevant Operator Competence Certificate under the CIWM (WAMITAB) scheme. The relevant qualification applicable to this activity is either:

CIWM (WAMITAB) Level 4 High Risk Operator Competence For Managing Physical & Chemical Treatment of Hazardous Waste, or;
CIWM (WAMITAB) Level 4 Medium Risk Operator Competence For Non-Hazardous Waste Treatment and Transfer

The CIWM (WAMITAB) registrations held by the nominated technically competent person at the site are included as Appendix 04 TCM Registrations/Qualifications. The nominated technically competent persons will achieve their statutory qualifications within the timescales specified by the Environment Agency on permit determination. If the trainee TCM's do not achieve their qualification within the timescales, then the site will employ the services of a qualified TCM until the in-house trainee TCM have achieved the full qualification. The relevant Continuing Competency Tests will be obtained every 2 years from the date specified on either the primary qualification, or the previous continuing competence qualification. Statutory qualifications will be displayed in a prominent place on site.

CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer	MROC1	Treatment - Non - Hazardous	TMNH

An assessment of staff training needs is carried out to identify the posts for which specific environmental awareness training is needed, and to determine the scope and level of such training. The assessment of training needs is reviewed on an annual basis with records retained.

The training programme ensures that all staff are aware of the following:

- Regulatory implications of the environmental permit for the site and their specific work activity;
- All potential environmental effects from operations under normal and abnormal circumstances;
- Incident management;
- The need to report deviations from the EP; and
- Prevention of accidental emissions and the action to be taken should accidental emissions occur.

All operatives will receive thorough training on waste identification, acceptance procedures and classification. This training will be conducted at the start of employment, in response to any non-conformances, incidents or significant changes in operations, and annually; and
All members of the management team including those responsible for overseeing site activities receive thorough training with regards to the conditions of the EP and their resultant duties. Management must also become conversant with and annually refresh their knowledge of this EMS.
Hard copies of this EMS will be available in the site office for all staff members to view as needed. The table below shows the training cycle for the site:

All new site staff and contractors (and existing site staff and contractors when the plan is introduced on site)	To be trained on all site procedures
Existing staff and regular sub-contractors	To be trained on policies and procedures every 6 months (on the nearest practicable date to the 1st of the month
Site Manager and Health, Safety and Compliance Coordinator to identify areas for refresher or new training	Every 3 months based on review of issues (or as soon as practicable after new requirements, new plant, equipment, etc.)
Site TCM and Site Manager	Annual review each year, or earlier if in a response to an incident or change in operational procedures

2.3 Site Security

The site has a number of security measures in place. The site benefits from a continuous presence of staff during operational hours, between 7am to 6pm Monday to Friday, and 9am to 1pm on saturdays. Security on site includes:

- 2m high perimeter fencing surrounding the site;
- 2m high perimeter brick walls;
- Main access gate controlled by keyholders on the commercial estate. The gate is secured by a
- highly sophisticated and commercial grade lock.
- The site is enclosed around the entire boundary
- CCTV systems across the site which is surveillance by businesses across the estate.
- The building is 4 sided and therefore secure from unauthorised access

All visitors and contractors are required to sign in and are escorted by a member of staff. The site's security infrastructure will be inspected at the commencement of every working day. Any defects or damage which compromise the integrity of the enclosure will be made secure by temporary repair by the end of the working day. Permanent repairs will be made within a maximum of five working days. All inspections, any defects, damage or repairs are recorded in the Daily Monitoring Checklist included as Appendix 05 – Daily Monitoring/Diary

The main gate is only open during the hours of 7am – 5pm Monday to Friday, and 10am to 5.30pm on Saturday, and 11am – 5pm on Sunday. Outside of these hours, access to the commercial estate is strictly by keyholders only. Any heyholder accessing the site is required to close/lock the gate once they have gained access, and close/lock the gate once they have left.

In the event of a breach of security at the site, the cause will be investigated, and appropriate mitigation measures implemented, such as repositioning of CCTV cameras, repair of security infrastructure, and/or additional deterrents. This will be recorded in the site diary. Records maintained include inspections and maintenance of perimeter fencing and gates, doors and locks, breaches of security, investigations and actions taken.

2.4 Display of Environmental Permit

A copy of the EP will be kept available in the Site Office for reference by all staff and contractors whose work may have an impact on the environment.

2.5 Permit Surrender

To assist in a permit surrender, records will be maintained to demonstrate how the land beneath the site has been protected between the date of EP issue and the end of operations which will be referenced from a Baseline Site Condition Report (BSCR). Records to be maintained will include:

- Maintenance of surfacing;
- Maintenance of drainage system; and
- Actions taken to clean up incidents and spillages.
- Site Diary Logs
- EA CAR Reports
- Site inventory showing where asbestos waste has been stored
- Significant findings from audits
- Tonnage logs
- Site Photos (before and after decommissioning)

2.6 Managing Documentation and Records

Controls are in place to ensure that all documents are issued, revised and maintained in a consistent fashion. The documents that are included within this scope of the controls are as follows:

- Policies;
- Responsibilities;
- Targets;
- Maintenance records;
- Procedures;
- Monitoring records;
- Results of audits;
- Results of reviews;
- Complaints and incident records; and
- Training records.

Records will be made and kept up to date on a daily basis to reflect deliveries, on-site acceptance and dispatches. All records relating to waste acceptance will be recorded, maintained, legible and made readily available on site and kept for a minimum of 5 years after the waste has been removed off site

2.7 Managing Documentation and Records

The Site Manager/TCM will maintain the site diary and complete the site diary on a daily basis at the end of each day, and the daily checklist.

The site diary checklist will record the following checks:

- Date
- Weather conditions
- Wind direction
- Wind speed
- Condition of site perimeter/boundary
- Fire prevention measures implemented
- Site noticeboard in good repair
- Waste stored on site is compliant
- Non-compliant waste on site is in quarantine
- Waste volumes on site compliant
- Waste quantities on site compliant
- All waste is protected from adverse weather
- Condition of impermeable surfaces,
- Litter not outside of site boundary
- Mud not escaping onto public highway
- Dust levels at acceptable levels
- Odours on site at acceptable levels,
- Waste is fully secure (no spillages)
- Noise levels at acceptable levels

- Site free from pests/vermin
- Site infrastructure in good repair
- TCM attendance
- Storage areas free from ingress of rain water
- Site equipment/plant in good repair
- Compliance with duty of care documentation
- Spill kits in place
- No signs of run off from wastes
- Waste storage container is secured and locked
- operating hours start and end
- which staff have been on site

Date: **Weather Conditions:** **Wind Speed:** **Wind Direction:**

Condition of the site perimeter		**Condition of impermeable surfaces**		**Noise levels**	
Thermal Cameras in use/working		**Site security systems**		**Pests/vermin**	
Fixed plant/equipment in good repair		**Condition of site building**		**Site infrastructure in good repair**	
Site noticeboard present & in good repair		**Quarantine area clear for deposit**		**TCM attendance meets permit requirements**	
All waste stored on-site is compliant		**Litter**		**Portable extinguishers checked and in place**	
Non-compliant waste quarantined		**Mud/debris**		**Compliance with the duty of care documentation**	
Mobile plant in good repair		**Dust & Fluff not accumulating**		**Spill kits in place**	
Waste volumes on-site compliant		**Odours**		**Fire equipment in place**	

Daily checks		
Check	Time	Comments
FPP Measures Implemented		
Sandbag visual assessment for damage/quanity		
Floodgate visual assessment		

Weekly checks		
Check	Date	Comments/Actions
Fire Alarm Check		
Fire Suppression System Check		

Details of any construction work, Maintenance, Breakdowns, Emergencies, Environmental Problems or Severe Weather Conditions affecting Waste Management Activities on site	

General site activities, complaints, non-compliance details		
	Operating hours	
	Start:	
	End:	
	Site Name	
	Staff on site	
	TCM on site	
	Name:	
	Date:	
	Time in:	
	Time out:	
	Sign:	

The site manager will also record: General site activities, maintenance undertaken, breakdowns, emergencies, complaints, environmental problems, and non-compliance details.

Alongside completion of the site diary, the Site Manager/TCM will update the tonnage logs which records daily waste arriving and leaving the site. All waste will arrive at the site with the requisite documentation as per section 5 of this EMS (Duty of Care)

2.8 Non-Premier Tyre Staff Working at the Site

The risk of non-conformance and non-compliance with site procedures required under the EMS is managed by requiring all contractors and/or their employers to:

- Be subject to Permission to Work procedures
- Undergo induction training
- Sign the permission to work form that they have understood and will comply with required site procedures.

All contractors must satisfy and evidence the permission to work requirements for employers' and public liability insurance.

2.9 Reporting Non-Compliance and Taking Corrective Action

Appropriate corrective action will be taken in response to problems identified at the site. Non-compliances detected on site will be reported, investigated and rectified and failures and weaknesses will be prevented. Staff will maintain awareness of non-compliances in the following areas:

- Actual or potential non-compliance with conditions of the environmental permit;
- System failure discovered at internal or external audit;
- Suppliers or subcontractors breaking the agreed operating rules;
- Incidents, accidents, and emergencies;
- Malfunction, breakdown or failure of plant;
- Other operational system failure; and
- Complaints and the action taken in response such as;
  - Obtaining additional information on the nature and extent of a non-conformance;
  - Discussing and testing alternative solutions;
  - Modifying procedures and responsibilities;
  - Seeking approval for additional resources and training; and
  - Contacting suppliers and contractors (as applicable).

2.10 Staff Handbook

A Staff handbook will be incorporated in all staff contracts and will set the requirements and policies for conduct and behaviour, including health and safety, Environmental, no-smoking, drug and alcohol and other areas.

2.11 Insurance

The site will be covered by insurance for:

• Employers' liability;
• Public Liability; and
• Material Damage.

The Site Manager and will be responsible for ensuring that all conditions of these policies are adhered to

2.12 Complaints

The complaints procedure and record form are included as Appendix 06 -Complaints procedure.

2.13 Auditing and Legal Compliance

There will be a formalised internal auditing procedures to ensure the facility is audited against its EMS and permit. The Audit will build upon the site diary checks and provide a more in-depth compliance inspection. The audit is included in Appendix 07 – Internal Audit.

2.14 Monitoring , Measuring and Reviewing Environmental Performance

The formalised management structure reviews environmental performance, and ensure any necessary improvements and/or corrective actions are taken. Review meetings will be held 3 times per year.

2.15 Operational Control and Preventative Maintenance

Premier Tyres ensures effective control of site operations, the use of approved suppliers and contract services for the maintenance of operational equipment, and the calibration of any monitoring equipment. Premier Tyres acknowledges that poor maintenance can be the cause of environmental incidents. As the potential of failure of plant and infrastructure (e.g. Impermeable surfaces, seals and bunds, balers, forklifts, containers etc.) could lead to fugitive emissions to the environment, Premier Tyres carry out a programme of Planned Preventative Maintenance (PPM). All items of plant and equipment are regularly inspected and maintained in accordance with the manufacturer's specifications. The site also benefits from on site mechanical fitters to help maintain plant and equipment.

2.16 Operational Control and Preventative Maintenance

All relevant elements of the site will be designed in accordance with recognised standards, methodologies and practices including in respect of:

- Material selection;
- Handling, storage and installation;
- Conformance and performance testing; inspection and validation.

3 Accident Prevention and Management Plan

Premier Tyres recognises the importance of the prevention of accidents that may have environmental consequences and that it is crucial to limit those consequences. Premier Tyres have developed a system to identify, assess and minimise the environmental risks and hazards of accidents and their consequences which forms the Accident Prevention and Management Plan.

The Accident Prevention and Management Plan will be implemented and maintained at the facility to ensure that the site and staff are fully prepared for any such incidents. The Accident Prevention and Management Plan will be reviewed at least every four years or as soon as practicable after an incident, or in the event of a permit variation or change in operational process with changes made accordingly to minimise the risk of occurrence.

The following section has been prepared in accordance with EPR Guidance EA Accident Prevention and Management Plan guidance. The following Accident Prevention and Management Plan describes the techniques that will be implemented to minimise the risks posed to the environment. Activities affecting the health and safety (H&S) of operatives, contractors and visitors will be separately managed in compliance with H&S regulation and company H&S Policy.

3.1 Hazard Identification and Contingency Plan

The following potential hazards have been identified:

- Unauthorised waste;
- Fire;
- Loss of containment - spillage and leakage;
- Security and vandalism;
- Flooding;
- Breakdowns; and
- Enforced shutdowns.

The following sections summarise the measures necessary to minimise the potential causes and consequences of these hazards (Table 3.1 Hazards, Pathways and Risk Management) to operationalise the Accident Prevention and Management Plan. This and the Accident Prevention and Management Plan, of which it forms a part, are standing items for review at all site management meetings and are reviewed whenever an accident or near-miss is recorded. For completeness, Appendix 8 contains the a bespoke Risk Assessment.

Classification of Consequence		
Classification	**Definition**	**Examples**
Severe	Short term (acute) risk to human health likely to result in 'significant harm;' as defined by the Environmental Protection Act 1990, Part IIA. Short term risk if pollution (note: Water Resources Act does not contain provision for consideration of the significance of pollution) of sensitive water resource. A short-term risk to a particular ecosystem, or organism forming part of such an ecosystem. (note: the definition of ecological systems with the DEFRA Contaminated Land Statutory Guidance 2012)	High concentration s of cyanide on the surface of an informal recreation area. Major spillage of contaminants from site to a controlled water. Explosion, causing building collapse (can also equate to short term human health risk if buildings are occupied).

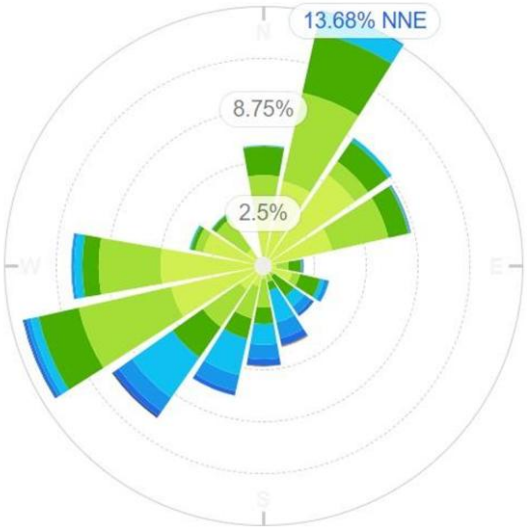
Medium	Chronic damage to human health ('significant harm as defined DEFRA Contaminated Land Statutory Guidance 2012) Pollution of sensitive water resources. A significant change in a particular ecosystem, or organism forming part of such ecosystem. (note: the definition of ecological systems with the DEFRA Contaminated Land Statutory Guidance 2012)	Concentration of contaminant from the site exceeds the generic or site specific assessment criteria. Leaching of contaminants from a site to a principal or secondary aquifer. Death of species within a designated nature reserve.
Mild	Pollution of non-sensitive water resources. Significant damage to buildings, structures, and crops. ('Significant harm' as defined in DEFRA Contaminated Land Statutory Guidance 2012 and EPA 1990 Part IIA). Damage to sensitive buildings/structures or the environment.	Pollution if non-classified groundwater. Damage to building, rendering it unsafe to occupy (e.g. foundation damage resulting in instability).
Minor	Harm, although not necessarily significant harm, which may result in a financial loss or expenditure to resolve. Non-permanent health effects to human health (easily prevented by means such a personal protective clothing etc.). Easily repairable effects of damage to buildings/structures	The presence of contaminants at such concentration is that protective equipment is required during the site works. The loss of plants in landscaping scheme. Discolouration of concrete.

Classification of Probability	
Classification	**Definition**
High Likelihood	There is a pollution linkage and an event which would either appear very likely in the short term and almost inevitable over the long term, or, there is evidence at the receptor of harm or pollution.
Likely	There is a pollution linkage and all the elements are present in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short term and likely to occur over the long term.
Low Likelihood	There is pollution linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place and is less likely in the shorter term.
Unlikely	There is a pollution linkage but circumstances are such that it is improbable that an event would occur even in the very long term.

		Consequence			
		Severe	**Medium**	**Mild**	**Minor**
Probability	High Likelihood	Very High Risk	High Risk	Moderate Risk	Moderate/Low risk
	Likely	High Risk	Moderate Risk	Moderate to low Risk	Low Risk
	Low Likelihood	Moderate Risk	Moderate/Low Risk	Low Risk	Very low Risk
	Unlikely	Moderate/Low Risk	Low Risk	Very Low Risk	Very Low Risk

Windrose

A windrose providing the frequency of wind speed and direction from the Lee-on-the-Solent Meteorological Station for the period of 5 yearly averages is presented in Figure 4-1 below. The windrose shows that the most prominent wind direction is from the Nort North East. Winds from the North North East are relatively infrequent. Pollutants can impact anyone within 1km of the site and in certain circumstances will have an impact on public health at greater distances than 1km



3.2 Emergency Contact Details

In the event of an emergency or accident, the Table 3-2 below provides the relevant details:

Table 3-2 Emergency Contact Details (24/7)

Position	Name	Contact Number
Trainee TCM	Alison Skinner	07765 264897
Business Owner	Alan Skinner	07885 504276

3.3 Contingency Plans and Procedures

The site has contingency plans in place to ensure that the following is achieved:

- Compliance with all EP conditions and operating procedures during maintenance or shutdown at the site;
- No exceedance of limits in the EP and that appropriate measures for storing and handling waste continue to be applied; and
- Cessation of waste acceptance unless there is a clearly defined method of recovery and enough permitted capacity on site

The sites contingency plans are included in Appendix 9 – Contingency Plan

4 Operations and Activities

End-of-Life Tyres will be brought to site via lorries. The waste received at the Application site will be limited to 16 01 03 only. No hazardous waste will be accepted at the Application Site. Lorries will be emptied onto the designated area prior to treatment. The treatment area is within a 4 sided designated building . All waste sorting will be undertaken by hand and then immediately treated to avoid double handling. Waste will be stored both inside on impermeable surfaces in designated waste areas with sealed drainage. Once waste has been treated (baled) it will be stored pending removal. No more than 100 tonnes or 150 m3 will be stored at any one time and regular stock checks will be undertaken to ensure the limit is not exceeded. Once enough waste has been bulked up for transfer it will despatched from the site.

4.1 Permitted Activities

The permitted activities are set out in Table 1.1 in Section 1 of this document.

4.2 Waste Storage Plan:

The site will be permitted to accept the following waste types:

Waste Code	Description
16	Wastes not otherwise specified on the list
16 01	End-of-life Vehicles (except 13,14,16 06 and 16 08)
16 01 03	End-of-life-tyres

The site will be permitted to store the following quantities:

Table D - Permitted waste quantities	
Annually	No more than 21000 Tonnes
Any one time	No more than 100 Tonnes
Duration	No longer than 3 months

Initial handling of waste will take place within the treatment building. Baled Waste will then be transferred to the second unit. There will be no waste liquids stored on-site and therefore the risks of pollution are minimal. The designated undercover area and storage area is underlain by impermeable concrete. The site has existing foul sewage for the toilet facilities. There are no hard standing areas used in conjunction with the waste storage/treatment to discharge rain water into ground. The entire operation is entirely undercover and there are no trade effluents being discharged to foul or surface waters.

Checks will be made throughout the day by the Site Manager, TCM or another trained member of staff of the storage areas, to monitor for signs of non-compliance.

The site will store waste no longer than 3 months from when it is accepted onto the site. The location of the waste storage area can be see on Drawing 3 – Site infrastructure plan.

4.3 Site Operations

Initial handling of waste will take place within the designated undercover area. Wastes will then be transferred to the treatment area for processing. There will be no waste liquids stored on-site and therefore the risks of pollution are minimal. The designated undercover area/storage areas are underlain by impermeable concrete. The site does not have existing foul sewer or surface water drains. There are hard standing areas not used in conjunction with the waste storage/treatment to discharge rain water into ground.

Checks will be made throughout the day by the Site Manager, TCM or another trained member of staff of the storage areas, to monitor for signs of non-compliance.

The site will store waste no longer than 3 months from when it is accepted onto the site. The location of the waste storage area can be see on Drawing 3 – Site infrastructure plan.

4.4 Hours of Operation

The site operate from 7am to 6pm weekdays (Monday to Friday) , and 8am to 1pm on Saturdays. no operations are intended to take place on Sundays or bank holidays

4.5 Site Infrastructure and Equipment

4.5.1 Site Identification Board

A site identification board which is easily readable from outside the entrance during hours of daylight, will be displayed. The identification board will be inspected at least once per week. In the event of damage or defect that significantly affects the legibility of the board, it will be repaired or replaced within five working days, or to a timescale agreed with the EA. Any defects and repairs will be recorded in the site diary. The board will display the following information:

- Site name and address;
- Permit holder;
- Permit number
- A statement that the site is regulated and permitted by the Environment Agency
- Emergency contact name and telephone number;
- EA national telephone numbers; and
- Days and hours site is open to receive waste.

4.5.2 Plant and Equipment

The following Plant and Equipment is held/installed on site

- 3x Baler
- 2x Forklift Trucks

All items of plant and equipment used on site are maintained in accordance with manufacturer's recommendations and/or specifications referred to in this document.

5.0 Duty of Care: Waste Pre-Acceptance and Acceptance

Premier Tyres waste pre-acceptance, acceptance and tracking policies and procedures ensure that it is fulfilling its Duty of Care responsibilities. Although the fact that loads are pre-booked, and are single waste stream only, this does not require rigorous procedures carried out by trained operatives able to distinguish between different types.

5.1 Duty of Care: Waste Pre-Acceptance

All incoming waste loads are booked in advance, through the manager who arranges for the load to be collected from the customer and the date and time of delivery to the site. The manager is responsible for undertaking the waste pre-acceptance procedures. The waste pre-acceptance procedures follow a risk-based approach considering:

- The source and nature of the waste;
- Potential risks to process safety, occupational safety and the environment (for example from emissions); and
- Knowledge about the previous waste holder(s). The objective of the waste pre-acceptance procedure is to evaluate customer information at the enquiry stage to determine whether the waste could be accepted at the site.

All waste will only be accepted with prior notification being made to Premier Tyres. This is to ensure there is sufficient room in the designated storage area and the site does not exceed capacity. Waste

will only be accepted when once enough information has been established about the waste holder, producer and the waste description.

The waste producer/holder will be required to send the necessary waste characterisation and or WM3 Assessment information to Premier Tyres in advance of delivery of waste to the site. This information enables Premier Tyres to determine whether the waste stream can be accepted at the site. No waste will be accepted at the site unless the necessary characterisation information has been received in advance and approved for receipt. The waste producer/holder must provide the following waste characterisation information for each load for acceptance onto the site:

- Waste source and origin;
- The process producing the waste (including a description of the process and characteristics of the waste types used to comprise the batch of material);
- The waste treatment applied;
- The appearance of the waste (including smell, colour, consistency and physical form); and
- Analysis and determination of waste code in accordance with WM3 (where appropriate).

5.2 Duty of Care: Waste Acceptance

The site will operate from 7am to 6pm weekdays (Monday to Friday) and 9am to 1pm on Saturdays, with no operations intending to take place on Sundays or bank holidays.

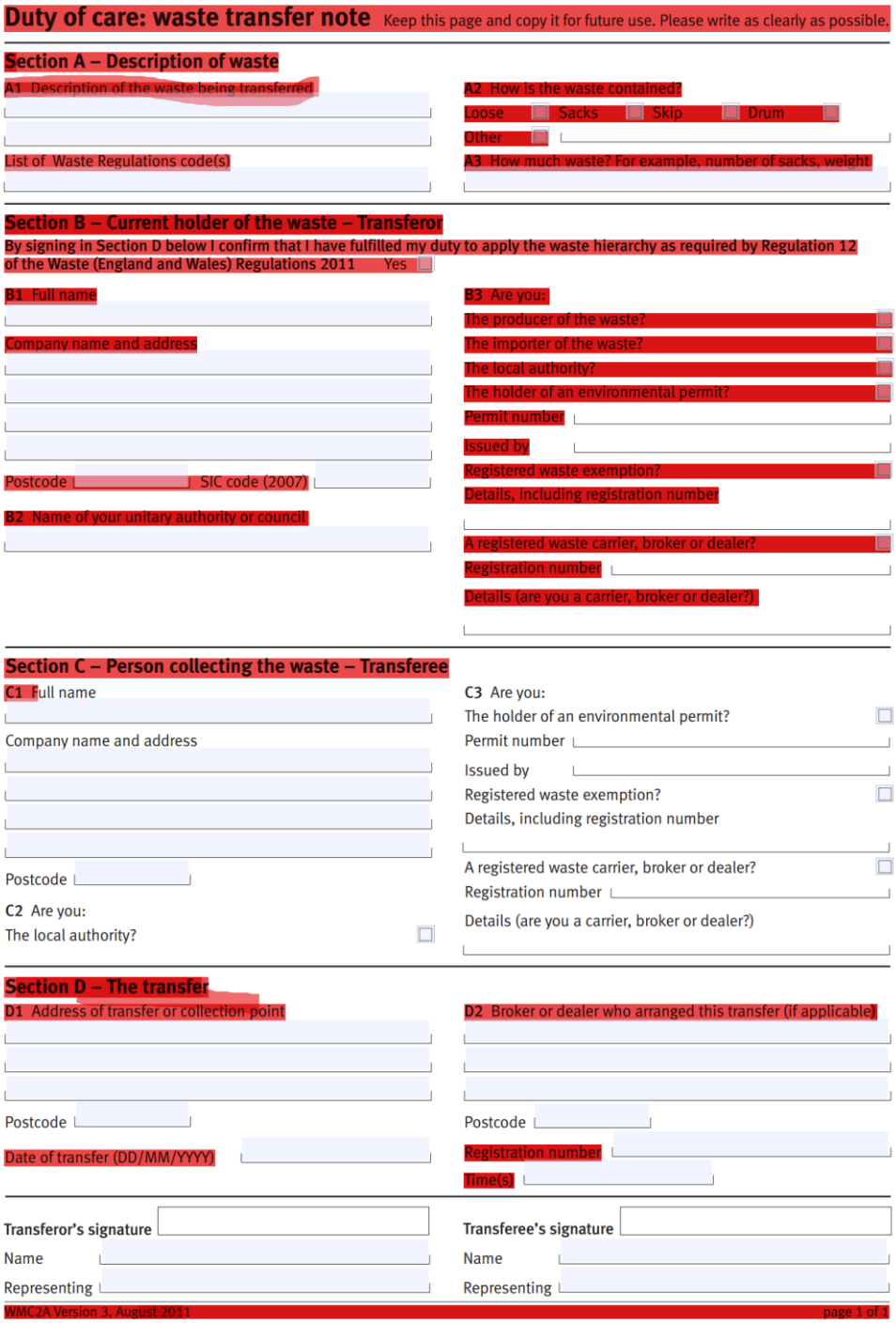
All waste brought to site is inspected in accordance with the following procedure:

- All waste carriers entering the site must report to the office where the paperwork is checked and verified (Waste Transfer Notes). If any paperwork is missing the manager/TCM will be informed immediately;
- The delivery vehicle driver is asked to park in a designated area subject to acceptance of the paperwork. The vehicle is then directed to the waste unloading area for a visual waste inspection and is then unloaded by Premier Tyres trained staff.
- The load list and paperwork are checked against the received waste. The number of tyres are counted against the load list and the weight and description of goods is verified against the load list where necessary.
- The incoming load is visually inspected for quality, damage and any discrepancies to check that the material conforms with the EWC code and description of the material on the waste transfer documents. Any discrepancies will be reported to the Site Manager/TCM
- Wastes are only accepted if the description in the accompanying documentation is in accordance with the EP and that onsite inspection confirms waste is consistent with the description provided;
- Any non-conforming waste is immediately (a) Rejected and removed by the carrier that bought the waste in, or, (b) quarantined and marked with a yellow sign;
- A record is kept of all deliveries and refusals. The waste producer and the EA will be notified of any non-conformance. Records of non-compliant waste received at the site will include details on:
- The quantity;
- Characteristics;
- Origin;
- Delivery date and time; and

- The identity of the producer and carrier. The site's booking system will ensure that wastes are not accepted unless the site is adequately resourced to receive the waste. Any rejected loads will be reported to the EA.

5.3 Waste Transfer Notes

All Non-Hazardous Waste must have a valid Controlled Waste Transfer Note that is completed in full >>



Duty of care: waste transfer note Keep this page and copy it for future use. Please write as clearly as possible.

Section A – Description of waste

A1 Description of the waste being transferred

List of Waste Regulations code(s)

A2 How is the waste contained?
Loose ☐ Sacks ☐ Skip ☐ Drum ☐
Other ☐

A3 How much waste? For example, number of sacks, weight

Section B – Current holder of the waste – Transferor

By signing in Section D below I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011 Yes ☐

B1 Full name

Company name and address

Postcode SIC code (2007)

B2 Name of your unitary authority or council

B3 Are you:
The producer of the waste? ☐
The importer of the waste? ☐
The local authority? ☐
The holder of an environmental permit? ☐
Permit number
Issued by
Registered waste exemption? ☐
Details, including registration number
A registered waste carrier, broker or dealer? ☐
Registration number
Details (are you a carrier, broker or dealer?)

Section C – Person collecting the waste – Transferee

C1 Full name

Company name and address

Postcode

C2 Are you:
The local authority? ☐

C3 Are you:
The holder of an environmental permit? ☐
Permit number
Issued by
Registered waste exemption? ☐
Details, including registration number
A registered waste carrier, broker or dealer? ☐
Registration number
Details (are you a carrier, broker or dealer?)

Section D – The transfer

D1 Address of transfer or collection point

Postcode

Date of transfer (DD/MM/YYYY)

D2 Broker or dealer who arranged this transfer (if applicable)

Postcode

Registration number

Time(s)

Transferor's signature
Name
Representing

Transferee's signature
Name
Representing

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5.4 Duty of Care: Quarantine Procedure

The quarantine and rejection procedures ensure that all non-conforming waste is removed from the site and that the waste producer and carrier are informed so that appropriate action can be taken to prevent recurrence. Non-conforming waste will be identified by Site Operatives on inspection of documentation or the load itself.

If unauthorised waste is identified, it will be moved to the designated quarantine area and marked with a yellow sign. The Site Manager will notify the customer of non-conforming material within 24 hours of receipt, and where the material is not permitted, arrangements will be made to return the material to the customer at the customer's expense.

6.0 Emissions and Monitoring

The site is constructed and will be operated so that there are no polluting emissions to air, surface water, groundwater or land, apart from uncontaminated surface water run off which has not come into contact with waste.

6.1 Drainage and Engineered Containment of the site

The site is operated in such a way as to prevent emissions to surface water and groundwater. Waste acceptance and storage areas of the site are engineered to be impermeable.

There are hard standing areas used in conjunction with waste storage/treatment activities

All waste storage takes place on impermeable surfacing and will be stored under cover. Site surfacing is inspected daily for defects to ensure the continued integrity of the surface. Any required repairs will be given a temporary solution immediately, and a permanent repair will be fitted within 5 working days. Site surfacing will be maintained as required to ensure surfacing is fit for purpose. The surface will be maintained such that the working surface will:

- Remain even;
- Not be subject to settlement of differential settlement;
- Not be subject to rutting by vehicles even when wet; and
- Have sufficient durability to allow cleaning, for example, by scraping.

All operational areas, quarantine and fuel storage areas are inspected to ensure the integrity and fitness for purpose of their construction is maintained at all times.

6.2 Containment of Bunding for Chemicals and Fuels

Chemicals used on site will be stored in an appropriate containers that has an internal bund with the capacity to store 110% of the tank capacity. Bunds will be:

- Impermeable and resistant to the stored materials;
- Have no outlet;
- Be designed to catch leaks and prevent run off

- Have a capacity greater than 110% of the largest quantity
- Be subject to regular visual inspection. Storage areas are as show in the site plan at Appendix 01, with chemicals, paints and oils stored in the maintenance unit.

The site does not store fuels

6.3 Sewer

The site does not hold a discharge consent to sewer and there is no discharge to sewer from waste operations at the facility. The site is not serviced by mains drainage. It is unlikely that there will be a significant risk to surface and groundwater.

6.4 Odour

Due to the nature of the waste types accepted, it is not anticipated that odour will pose a risk on site. However, to prevent the potential release of odour from the acceptance and storage of waste (although biodegradable/putrescible waste will not be accepted), the following site management methods will be adhered to:

- Strict waste pre-acceptance, and acceptance procedures ensure that only permitted wastes are accepted at the site;
- Waste is removed from the site as soon as there is a full load;
- All wastes are stored within the 4 sided buildings which prevents the release of odour emissions;
- The site implements good housekeeping in operational areas;
- Incoming wastes will be subject to visual inspection and verification by site personnel who will be aware of the permitted wastes that can be accepted at the facility;
- Any waste which is found to be excessively malodorous is immediately placed in the quarantine area and marked with a red sign. The Site Manager will notify the customer within 24 hours of receipt and arrangements will be made to return the material to the customer at the customer's expense. This would only happen subject to the site accepting non-permitted waste types such as household waste/general waste

6.5 Dust Management

In order to minimise the emissions of dust from the site, the following measures are implemented:

- Speed limits (10 mph) are implemented for vehicles using the site. Clear signage and training are implemented to enforce this;
- Site access roads and operational areas are maintained and repaired to minimise emissions of dust due to uneven and poor surfacing;
- All staff are trained to ensure dust emissions are minimised and mitigation measures are implemented. All drivers delivering waste tyres to site are informed of dust minimising measures as well as correct signage throughout the site;
- All roads and operational areas are swept where necessary to reduce dust emissions

- Daily, visual inspection at all areas of the site and site boundary are carried out by site personnel;
- In the event that significant visual dust is observed at the boundaries of the operational areas; action will be taken to suppress the dust; and
- A record of the inspection findings and remedial action taken will be made in the Site Diary.
- Waste types accepted onto site are not inherently dusty in nature.

6.6 Noise

Operations will only be carried out during operational hours and within the confines of the site and In compliance with planning permission. All equipment is maintained and operated in accordance with manufacturer's guidance and is maintained in good working order. Vehicles delivering waste are fit for purpose and in good working order. The site is operated so as to minimise noise emissions from the site. Measures that are taken at the site include:

- Speed limits (10 mph) are implemented for vehicles using the site. Clear signage and training are implemented to enforce this;
- The site operational areas are maintained and kept in a good state of repair;
- The regular maintenance of roads to prevent the development of potholes significantly reduce noise generated;
- Site plant is selected and operated to minimise noise with silencing equipment fitted where appropriate;
- Engines are fitted with silencers where appropriate;
- All plant is switched off when not in use;
- All site personnel are trained in the need to minimise site noise, and are responsible for monitoring and reporting excessive noise when carrying out their everyday roles;
- Auditory inspections will be carried out continuously by site operatives during operational hours and in response to complaints;
- If noise issues are identified, site operatives will identify the source and a suitable mitigation measure that will reduce the noise emission levels will be identified and implemented.
- All operations are undertaken within the 4 sided building
- Waste treatment consists of sorting and baling only.

Any complaint received will be logged in the site diary. The Site Manager/TCM will investigate the complaint and will take action to identify the source of the noise and implement remedial measures where appropriate.

6.7 Pests

Due to the nature of the wastes proposed to be accepted at the site, it is unlikely that pests pose a risk at the facility.

The facility will be inspected by both site management/TCM and operatives for infestations of pests, vermin and insects on a routine basis. In the event that specific waste is found to be responsible for attracting scavengers, pests or infestation, this waste will be removed from the site as soon as practicable. A specialist pest control contractor will be deployed if required. Other measures will be to:

- Ensure all waste produced on site will be placed in designated lidded bins.
- All designated storage areas will be inspected on a weekly basis and entered into the site log book; and
- Any pest or vermin infestation will be reported and a commercial pest control company will be instructed to attend the site as soon as possible.

6.8 Litter

Due to the nature of the wastes to be accepted on-site, it is unlikely that the release of litter will pose a serious risk.

The boundary of the site and the immediate outside vicinity are regularly checked, and any windblown litter collected and disposed of appropriately. It is the responsibility of the site staff to constantly monitor the site for any signs of escaping materials either from within the site or from vehicles delivering or removing wastes to and from the site. Inspections will be carried out on a daily basis and a record maintained within the site diary.

The site will benefit from a physical boundary around the site which will be a combination of steel palisade fencing and buildings. This will help prevent light fractions escaping the boundary

The following control measures have been identified;

- Monitoring of litter and undertake litter picking if required;
- All litter produced on site is removed at the end of each working week and placed in a suitable lidded bin at the end of each working day
- In extremely dry and/or windy conditions, any waste produced on site e.g. food packaging will be place in a lidded bin.
- All operations are conducted within the 4 sided building

6.9 Mud and Debris

Access to the site is via Oakley Road. The following measures are taken in order to prevent the deposition or tracking of mud and debris from the site onto public areas or highways:

- Waste acceptance and storage areas of the site benefit from impermeable surfacing which reduces the likelihood of mud tracking into vehicles;
- The site will implement good housekeeping arrangements. All areas of the site will be cleaned on a daily basis;
- Incoming vehicles containing wastes are enclosed
- All vehicles leaving the site are visually inspected by site operatives to ensure they are clear and that the container is completely locked and sealed before being exported from the site
- Vehicles will be cleaned as necessary;
- Daily visual site inspections by site operatives will identify any problems with mud and debris. Should problems occur they will be cleaned up as soon as practicable;
- Site roads are maintained free of significant quantities of mud and debris; and

- Where necessary road cleaning equipment can be deployed. In the event that mud or debris arising from the site is deposited onto public areas outside the site, the following remedial measures will be implemented:
- The affected public areas outside the site will be cleaned;
- Traffic will be isolated from sources of mud and debris within the site to prevent further tracking, and measures will be taken to clear any such sources as soon as practicable; and
- Provision will be made for road sweepers (if required) on the site access roads to stop any mud being carried onto public roads.

7.0 Information

All relevant notifications and submissions to the EA regarding the site will be made in writing and will quote the permit reference number and the name of the permit holder. Records must be maintained for at least 2 years (non-hazardous), however in the case of off-site environmental effects, and matters which affect the condition of land and groundwater the records shall be kept until permit surrender.

7.1 Reporting and Notification

TCM

The EA will be informed in writing of any changes in the technically competent management of the site and the name of any incoming person, together with evidence that such person has the required technical competence.

Waste Types and Quantities

A summary report of waste types and quantities accepted and removed from the site each quarter will be submitted to the EA within 1 month of the quarter end unless otherwise required by the permit conditions.

Relevant Convictions

The EA will be notified of the following events:

- Any convictions of any relevant offence; and
- Any appeal against a conviction for a relevant offence and the results of such an appeal.

Notification of Change of Operator or Holder's Details

The EA will be notified of the following:

- Any change in the operator's name, entity or registered office address; and
- Any steps taken with a view to the individual going into administration

Adverse Effects

The EA will be notified without delay following the detection of the following (if it is causing or may cause significant pollution):

- Any malfunction, breakdown or failure of equipment or techniques;
- Any accident;
- Fugitive emissions which have caused, are causing or may cause significant pollution; and
- Any significant adverse environmental and health effect.

8.0 Fire

Sites that store combustible wastes are at risk from fires on sites. These events can pose an environmental risk to receptors off site, both from the smoke plume from the fire and from the firewater runoff created by any firefighting activities. Sites storing combustible materials such as paper, plastics, cardboard and scrap metal and tyres are required to have in place a fire prevention plan that follows the standards prescribed in the Environment Agency's (EA) guidance documents – updated 11th January 2021 . Premier Tyres will be permitted for the acceptance and treatment of combustible waste are therefore will be required to have a Fire Prevention Plan. The Fire Prevention Plan will be a standalone document and will utilise best practice in minimising the likelihood of a fire occurring to protect the receptors identified during the location screening.

8.1 Fire Evacuation Procedures

Emergency Action Plan (EAP) The procedure to be followed in the event of fire, and displayed in "Fire Action" notices sited where shown on the fire emergency drawing, is:

IF YOU DISCOVER A FIRE YOU MUST:

- Raise the alarm by operating the nearest fire alarm call point
- Assist any member of the public , contractor, or staff who needs assistance.
- Attack the fire with the equipment provided (if you can do so without undue risk) inline with the sites FPP
- Obey Building Managers and Fire Wardens instructions.

IF YOU HEAR THE FIRE ALARM YOU MUST:

- Assist any member of the public or colleague who needs help.
- Leave the premises by the nearest available exit, closing all doors behind you.
- Report to the person in charge of the assembly point at: In car park area opposite exit, away from the building
- Do not stop to collect personal belongings.
- Do not shout or run - this may cause panic.

YOUR RESPONSIBILITIES

- You must know how to find the escape routes provided.
- You must know how to operate the fire alarm.
- You must know how to use the firefighting equipment.

FIRE WARDENS RESPONSIBILITIES

- Fire wardens will check their designated zones to ensure that all persons have vacated the premises.
- Fire wardens will liaise with emergency services to update as to the situation
- Fire wardens will conduct roll-call to identify all persons in premises at time of emergency.

CALLING THE FIRE BRIGADE

- A nominated person – (Alison Skinner or fire wardens in her absence) will call the Fire Brigade immediately the fire alarm sounds. (Management must ensure that the Fire Brigade is called, even if the designated person fails to do so).
- There are 'Out of hours' contacts, who are contacted by the thermal detection system who will contact the fire brigade in the event of an alarm.

REFERENCES

Reference 1.
Environment Agency guidance: 'Develop a management system' -
https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

Reference 2.
British Geological Survey online database, Geology of Britain Viewer accessed at:
http://mapapps.bgs.ac.uk/geologyofbritain/home.html

Reference 3.
Environment Agency, 'What's in Your Backyard' online database accessed at:
http://maps.environment-agency.gov.uk/wiyby/wiybyController?ep=maptopics&lang=_e

Reference 4. Natural England 'MAGIC' online database, accessed at:
http://magic.defra.gov.uk/MagicMap.aspx

Reference 5. OPRA Scheme for Waste Facilities April 2017

Reference 6. Environmental Permitting Charging Scheme & Guidance Version 5 January 2017 R7. Integrated Pollution Prevention and Control, Reference Document on Best Available Techniques for the Waste Treatments Industries August 2006

9 Changing climate

Summer daily maximum temperature

Impact 1

Potential for increased waste reactions or fires involving heat sensitive or combustible waste.

The mitigation for this includes:

- The site does not accept heat sensitive wastes but if such wastes are construed as such then it will be stored in indoors within the site.
- there is suitable segregation and separation of waste types.

Impact 2

Dry vegetation in and around the site presents an increased fire risk during extremely dry weather.

There is a thick tree line running along the back of the permitted area

The mitigation for this includes:

- No hot works occur within this area,
- there is also a no smoking policy on site.
- All FPP measures are implemented at all times
- Wastes are contained within the building and are separated by approx. 10 meters from the treeline.

Impact 3

Potential increase in elevated temperature expansion and stress of plant, pipework, and fittings.

The mitigation for this includes:

All fixed and mobile plant is inspected daily and weekly before the start of every shift which will mitigate the risk of elevated temperature stress to the machinery. All fixed and mobile plant is operated within a ventilated indoor setting which will further reduce the equipment to the exposure of excessive heat.

Impact 4

Potential increased dust emissions from processing areas and site roads.

The mitigation for this includes:

The site does not accept wastes consisting mainly or solely of dusts. Furthermore, waste tyres (even in its smallest form) do not generate dust emissions. The site is also cleaned down daily to reduce excessive dust build up.

Impact 5

Stockpiled waste piles:

- attracting increased numbers of pests.

- leading to an increased incidence of odour emissions.

The mitigation for the above includes:

- Waste acceptance procedures in place to prevent excessively odorous or insect-infested loads being deposited at the site.
- Waste is deposited and turned around rapidly, storage areas and bays are cleaned and washed down regularly.

Winter daily maximum temperature

Impact 1

Slightly higher winter maximums could generate regular odour complaints and pest infestations.

The mitigation for the above includes:

- The site will place down a series of pest traps within the site which will reduce the risk of pests (where needed).
- Waste acceptance procedures in place to prevent excessively odorous or insect-infested loads being deposited at the site.
- Waste is deposited and turned around rapidly, storage areas are cleaned and washed down regularly.

Impact 2

Lower winter temperatures could result in an increased risk of pipes freezing.

The mitigation for the above includes:

- Each piece of mobile and fixed plant is inspected on a daily and weekly basis to ensure that there are no ruptured pipes or leaking fluids. (Coolant or hydraulic fluid).
- Each piece of machinery is also serviced at the recommended manufacturers intervals.

Daily extreme rainfall

Impact 1

There is potential for flooding as drainage is not installed at the application site.

The mitigation for this will include:

- Suitable measures are in place for the management of anticipated surface water and flood waters.
- Unmade areas will cause vertical leaching of clean surface waters
- Areas where wastes are handled or stored are provided with contained drainage.

Average winter rainfall

Impact 1

There is potential for flooding as drainage is not installed at the application site.

The mitigation for this will include:

- Suitable measures are in place for the management of anticipated surface water and flood waters.
- Unmade areas will cause vertical leaching of clean surface waters
- Areas where wastes are handled or stored are provided with contained drainage.
- Site is equipped with floods gates to prevent the ingress of water into the building

Sea level rise

Impact 1

The site is is not located near any coastline. Therefore, there is no risk from sea level rising.

Drier summers

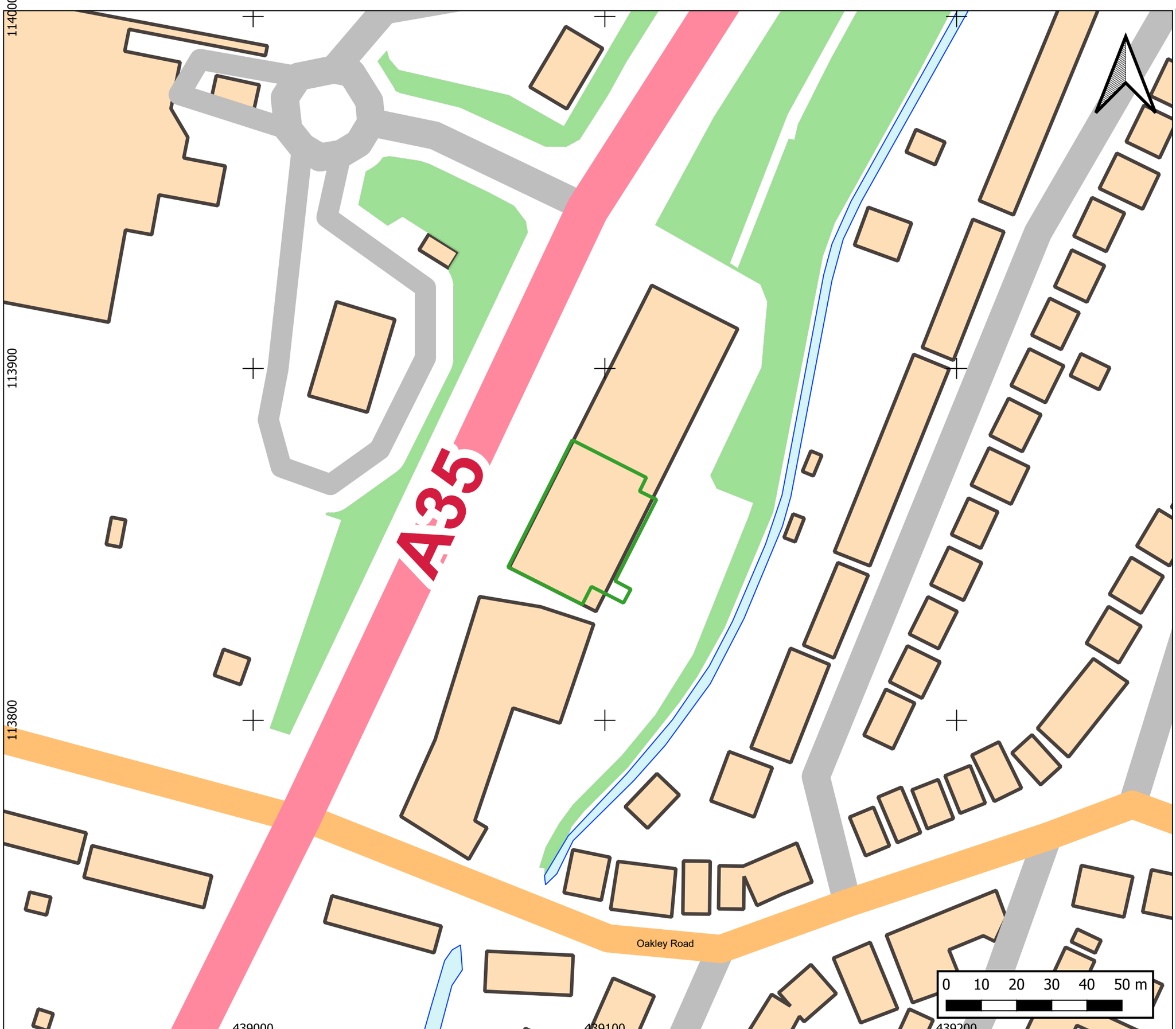
Impact 1

Potential increased use and reliance on mains water for dust suppression, cleaning, and fire water.

The mitigation for this will include:

- On-site water resource will be provided as per the Fire Prevention Plan's

Drawing 1 – Site Location Plan

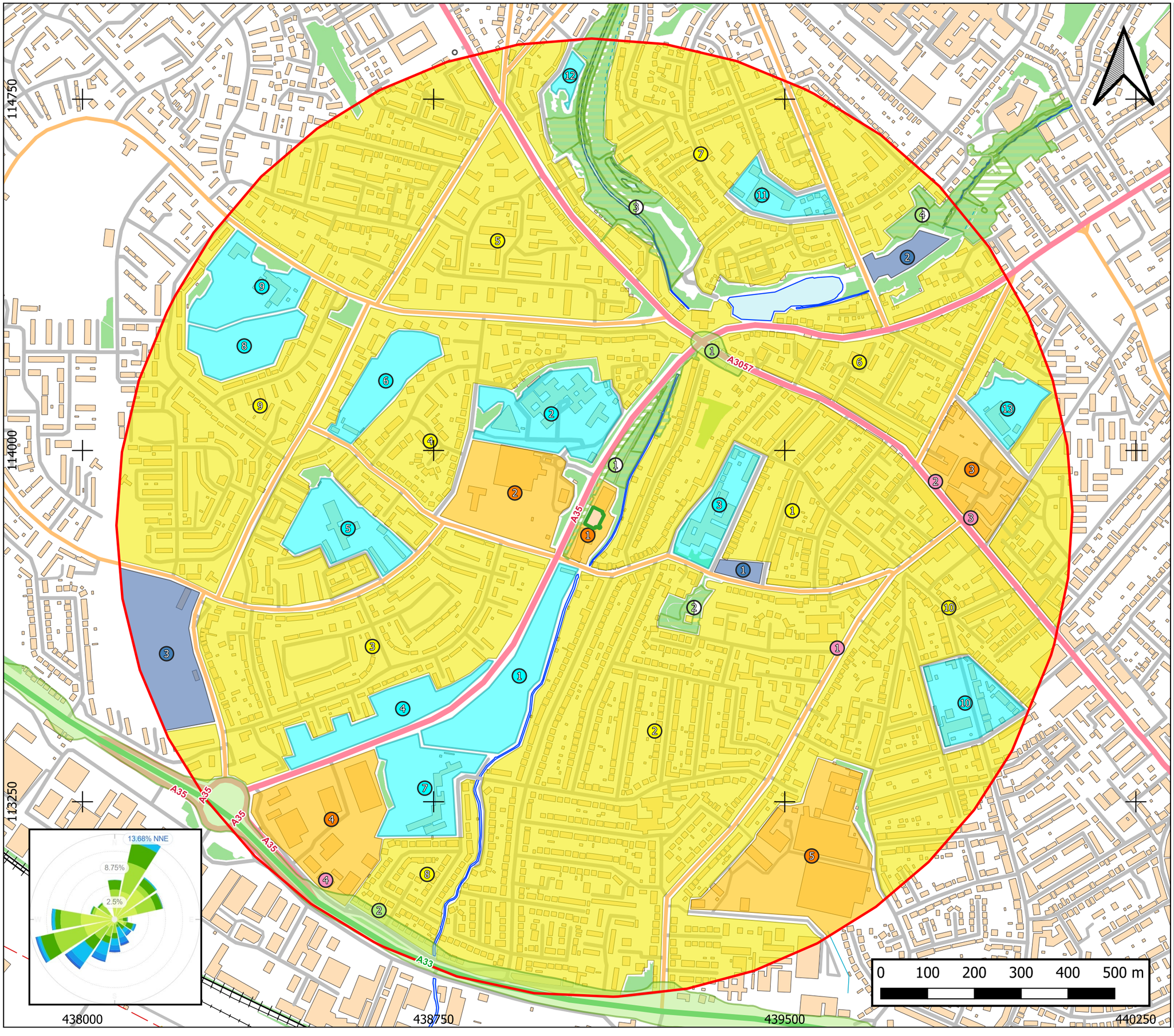


Key:

Permit Boundary

Drawing Title: Site Location Plan
Ref:
Scale: 1:1000 (A3)
Date: 2025-09-03
Revison: Draft
Drawn By: TW
Address: Premier Tyres, Unit B (B1 & B2) Atlantic Works, Oakley Road, Southampton,
Changelog: - N/A

Drawing 2 – Sensitive Receptor Plan & Table



Key:

- Permit Boundary
- 1 km Buffer
- Residential Area
- Commercial Area
- Public Use Area
- Recreational Area
- Designated Site Area
- Non-Designated Site Area
- Residential ID
- Commercial ID
- Public Use ID
- Recreational ID
- Designated Site ID
- Non-Designated Site ID
- Heritage Site ID
- Surface Water
- Woodland
- Railway

Drawing Title: Sensitive Receptor Plan 1 km

Ref:

Scale: 1:7,500 (A3)

Date: 2025-07-29

Revison: Draft

Drawn By: TW

Address: Premier Tyres, Unit B (B1 & B2) Atlantic Works, Oakley Road, Southampton,

Changelog:
- N/A

Drawing 3 – Site Infrastructure Plan

Key:

- Permit Boundary
- Building
- Impermeable Surface Area
- Quarantine Area
- Forklift Parking Area
- Roller Shutter Door
- Partitition Wall
- Flood Gate
- 7 m Distance
- Fire Supression System
- Sandbag Storage
- Baler Storage
- Fire Extinguishers
- Automated Fire Suppression

Drawing Title: Site Layout Plan

Ref:

Scale: 1:275 (A3)

Date: 2025-08-27

Revison: Draft

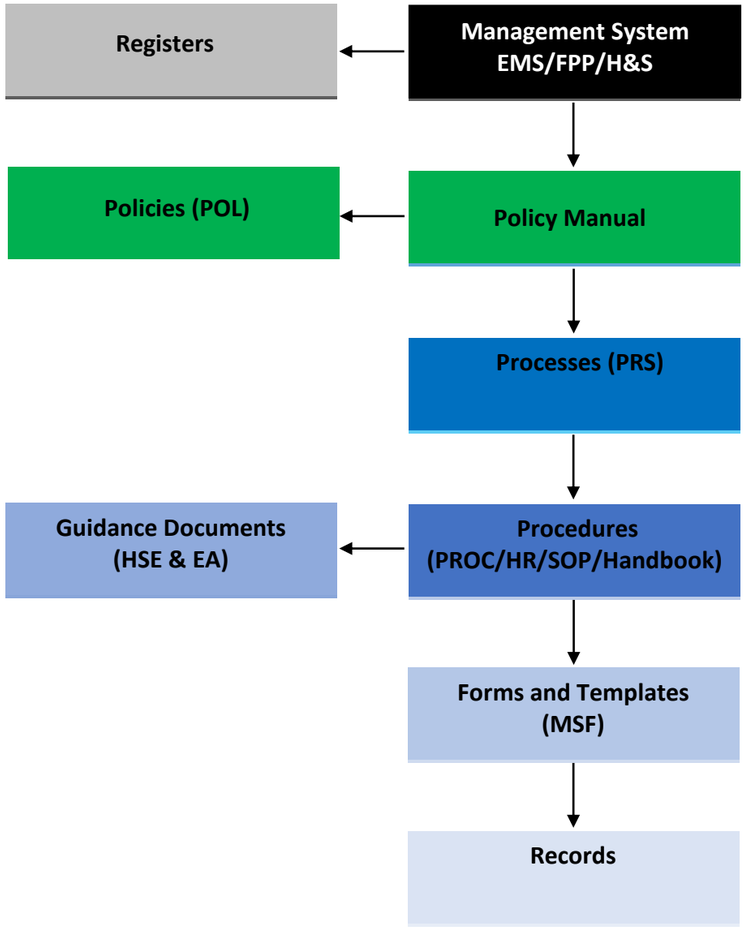
Drawn By: TW

Address: Premier Tyres, Unit B (B1 & B2) Atlantic Works, Oakley Road, Southampton,

Changelog:
- N/A

Appendix 1 – Site Operating Procedures

Key Documents



Registers
01 Key Documents

Policies
01 Policy Manual;
02 Health and Safety Policy Statement;
03 Environmental Policy Statement;
04 Quality Policy Statement;
05 Alcohol and Drugs Policy;
06 Stress at Work Policy;
07 Smoking at Work Policy;
08 Safe Driving Policy;
09 Equal Opportunities Policy;
10 Bullying and Harassment Policy;
11 Anti-Bribery Policy;
12 Right to Work Policy;
13 Human Trafficking & Modern Slavery Policy;
14 Work Life Balance Policy;
15 Corporate Social Responsibility Policy;
16 Sustainability Policy;
17 Work Safe Policy;
18 Working Hours Policy;
19 Employee Rights and Industrial Relations Policy;
20 Customer Care and Complaints Policy;
21 Supplier and Subcontractor Policy;
22 Performance Monitoring Policy;
23 Data Security and Protection Policy.

Processes
001 Planning
002 Enquires & Sales Order;
003 Job Planning;
004 Control of External Providers;
005 Compliance Obligations;
006 Hazard Identification & Risk Control;
007 Recruitment, Competence and Awareness;
008 Control of Monitoring & Measuring Resources;
009 Non-Conformity and Corrective Action;
010 Control of Documented Information;
011 Internal & External Communications;
012 Performance Evaluation
013 Environmental Aspects & Impacts;
014 Accidents, Incidents & Investigation;
015 Emergency Preparedness and Response;
016 Waste Management;
017 COSHH;
018 First Aid;
019 Occupational Health Surveillance.

Procedures
01 Management Flow Process;
02 Company Organisational Structure;
03 GDPR Policy;
03 Management Systems;
04 Duties & Responsibilities;
05 Company Objectives & Targets;
06 Communication;
07 Legal Register;
08 Learning and development;
09 Industry Standards;
10 Design Works;
11 PQQ & Questionnaires;
12 Sales Administration;
13 Enquiries Quotes & Tenders;
14 Order Processing & Planning
15 Business Contingency Plan;
16 Risk Assessments;
17 COSHH Assessments;
18 Method Statements;
19 CDM Regs.;
20 Stock Control & Movement;
21 Equipment Management;
22 Subcontractors & Key Suppliers (Questionnaire Form);
23 Fleet management;
25 Calibration;
26 PPE;
27 RPE;
28 Premises Management;
29 Technical Site Audit;
30 Accident & First Aid Procedure;
31 Induction, Appraisal, Training & Competence;
32 Behavioural Safety;
33 IT Policy;
34 Complaints and Corrective Action; DCUK PROC 35 Document Retention;
36 Counterfeit, Fraudulent and Suspect Items (CFSI);
37 Occupational Health and Wellbeing;
38 Alcohol and Drugs.

Handbooks and Standard Operating Procedures
Environmental Management System;
Fire Prevention Plan;
Environmental Risk Assessment

Guidance Documents
HSE 01 Permit to Work;
HSE 04 Legionella;
HSE 05 Electrical Safety;
HSE 06 Isolation of Services;
HSE 07 Asbestos;
HSE 08 Working at Height;
HSE 09 Temperature;
HSE 10 Roof Work;
HSE 11 Working with vibrations;
HSE 12 Confined Space;
HSE 13 Fire Precautions;
HSE 14 Manual Handling;
HSE 15 Control of Noise;
HSE 16 Emergency Preparedness;
HSE 17 Display Screen Equipment;
HSE 18 Lone Working procedures;
HSE 19 Waste Management;
HSE 20 Dermatitis;
HSE 21 Leptospirosis;
HSE 22 Health Surveillance Assessment;
HSE 23 Dust;
HSE 24 Drugs and Alcohol;
EA 25 Hazardous Waste Consignment;
EA 26 Waste Transfer Note
HSE 27 Contract Documentation;
HSE 29 Site Induction and Toolbox Talk
HSE 30 Site Inspections and Auditing
HSE 31 Lone Working
EA 32 How to Develop a Management System
EA 33 Fire Prevention Plan Guidance
EA 34 WM3 Technical Guidance

Forms and Templates

01 Site Diary
02 Health and Safety Audit
03 Environmental Audit
03 Waste Non-Conformance Report
04 Waste Inspection Form
05 Waste Transfer Note
06 Quarterly Returns
07 Consignee Returns
08 Near Miss Reports
09 Plant Check Sheet
10 Complaints Log

Records
Contractual Records
Site Data Pack Records
Audit and Site Inspection Records
Accident and Incident Records
Site-Specific Plan of Works
Waste Transfer Notes
Occupational Health Records
Memos and E-mails;
Toolbox Talks;
COSHH Assessments;
Accident/Incident Briefings;
Client Documentation;
Permit Compliance Inspections;
CAR Reports;
Environmental Incidents;

Appendix 2 – Environmental Permit

Appendix 3 – Training Matrix

Employee Name:
Programme
First Aid at Work Emergency
Fire Marshal Emergency
WAMITAB Lv4 MRQC1
IOSH Managing Safely
HGV DVLA
Forklift NPORS
Baler
Tyre Remover
Plant Maintenence
FPP
Environmental Permit
EMS
Completion Date
Refresher Date
Employee Name:
Programme
Fire Evacuation
Permit to work
Lone working
COSHH & Spillage
Hazard Reporting
H&S awareness
Work at Height
Manual Handling
Plant Inspection
Traffic Management
Working Plan
PPE/RPE
Accident reporting
Emergencies
Completion Date
Refresher Date
Toolbox Talk/SSOW
Inhouse Training
External Training
Training Required
Training Undertaken
Not Applicable
Refresher

Appendix 4 – TCM Registrations

CIWM | CIWM (WAMITAB) Qualifications

Unit Registrations | Results | Cohort Documentation

Cohort [38739] Alison Skinner]

Provider	[50584] Enviroawards Limited		
Programme/Course	[310] MROC1 - CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer		
Qualification	[310] CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer		
Qualification Number	601/8528/4		
Provider Reference	MROC1	**Purchase Order No**	
Cohort Start	07/07/2025	**Cohort End**	
Site	Enviroawards Limited		
Number of Learners	1		
Tutor	O'Brien, Ricky		
Quality Personnel	IQA (DCS): Gary Campbell [ID:103876]		

Learner Registrations

Click on the surname to review the learner's history for your currently selected organisation

Actions	All	Learner ID	ULN	Title	Forename	Surname	Date of Birth	Status	Metrics	Registered On	Registered
Actions	☐	142085		—	Alison	Skinner (more...)	01/02/1964	Registered	Metrics	CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer	07/07/2025

Cohort Unit Registrations

Pathway Name	Module Name	Unit ID	Unit Name	Level	Credits	RITS	National Code
[CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer]	Mandatory Group 1	589	Maintain health and safety in the waste resource management industry	L4	4	A/508/0756	OCS01
[CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer]	Mandatory Group 1	590	Manage the environmental impact of work activities	L4	3	F/508/0757	OCS02
[CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer]	Mandatory Group 1	593	Manage the movement, sorting and storage of waste	L4	5	F/508/0760	OCS05
[CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer]	Mandatory Group 1	600	Manage the reception of non-hazardous waste	L3	6	J/508/0887	OCS12
[CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer]	Mandatory Group 1	608	Manage transfer and disposal from non-hazardous waste treatment and recovery operations	L4	8	K/508/0980	OCS20

Appendix 5 – Site Monitoring/Diary

Date: **Weather Conditions:** **Wind Speed:** **Wind Direction:**

Condition of the site perimeter		**Condition of impermeable surfaces**		**Noise levels**	
Thermal Cameras in use/working		**Site security systems**		**Pests/vermin**	
Fixed plant/equipment in good repair		**Condition of site building**		**Site infrastructure in good repair**	
Site noticeboard present & in good repair		**Quarantine area clear for deposit**		**TCM attendance meets permit requirements**	
All waste stored on-site is compliant		**Litter**		**Portable extinguishers checked and in place**	
Non-compliant waste quarantined		**Mud/debris**		**Compliance with the duty of care documentation**	
Mobile plant in good repair		**Dust & Fluff not accumulating**		**Spill kits in place**	
Waste volumes on-site compliant		**Odours**		**Fire equipment in place**	

Daily checks		
Check	Time	Comments
FPP Measures Implemented		
Sandbag visual assessment for damage/quanity		
Floodgate visual assessment		

Weekly checks		
Check	Date	Comments/Actions
Fire Alarm Check		
Fire Suppression System Check		

Details of any construction work, Maintenance, Breakdowns, Emergencies, Environmental Problems or Severe Weather Conditions affecting Waste Management Activities on site	

General site activities, complaints, non-compliance details	
	Operating hours
	Start:
	End:
	Site Name
	Staff on site
	TCM on site
	Name:
	Date:
	Time in:
	Time out:
	Sign:

Appendix 6 – Complaints Procedure

Complaints Procedure and Record Form

PRINCIPLE

This section outlines the general procedure for receiving a complaint at Premier Tyres Permitted Facility. The purpose of this procedure is to ensure that any site operative working on site is aware of the procedures for the correct recording of a complaint.

SCOPE

This procedure covers how to record and respond to a complaint.

RESPONSIBILITY

All site operatives are responsible for carrying out the procedure as detailed below. Any changes required are the responsibility of the Site Manager or designated person to update and re-issue the amended procedure.

Complaints Record

Any complaints received from the local public or any local receptor are to be recorded on the Complaints Record form. The complaint is also to be recorded in the site diary.

All site operatives are required to follow the steps set out below if a complaint is received at the site;

1. Record details of the complainant (including; name, address and a telephone number) if provided.
2. Make a record of the date and time the complaint was made.
3. What happened, what was the complaint actually about?
4. Was anyone else on site or other stakeholders aware of the issue and if so, who?
5. Once confirmation is made that the complaint issue relates to the site, investigate the source of the problem. Contact the Site Manager
6. Record how the site has implemented methods to ensure the issue will not cause complaint in the future.
7. Make a record of any signs of pollution. If the complaint (such as emissions to groundwater or a local watercourse) is significant, the Environment Agency will need to be contacted on 0800 807060 as soon as possible. The severity of the incident shall be determined by the Site Manager.
8. The Site Manager shall send an email to the local Environment Agency office.
9. All Complaint Record forms shall be signed and dated.

Any actions taken in response to the complaint are to be recorded on the Complaints Record form and the site diary. On site visits, if the local Environment Agency Site Officer requests to see the site diary, all complaints should be shown. The complaints received are to be reviewed at future site audits to ensure these complaints will be avoided in the future. Health and safety All site operatives shall work with due regard to all relevant Health and Safety Regulations currently in existence relevant to operations on site.
NOTIFICATION AND DISTRIBUTION LISTS Once approved this document shall be published and will be effective from date of approval. Where appropriate, paper copies of this document shall be distributed as Controlled copies. Electronic notification to named users shall be recorded in the Audit History Report when a document is published/becomes approved or effective.

COMPLAINTS FORM

	REPORT No.
Message/Letter recieved by:	Date Received:
Passed to:	Time:

1) COMPLAINANT

Name: .....

Address: .....

.....

Post Code.....

Telephone:.....

2) NATURE OF COMPLAINT

Description:

Date of incident:.....

3) INVESTIGATION AND ACTION TAKEN

Complaintant contact: IN WRITING/TELEPHONE/FAX/E-MAIL/IN PERSON

SIGNATURE:

NAME:

DATE:

Appendix 7 – Internal Audit

Appendix 8 –Environmental Risk Assessment

Intended for
Premier Tyres
Date
February 2026
Project Number
(Premier-2026/001)

Premier Tyres
Atlantic Works
Environmental Risk Assessment

THE PERMITTING COMPANY

Premier Tyres Limited
Environmental Risk Assessment

Project No.	Premier-2026/001
Issue No.	1
Date	February 2026
Author	Kieran Ball
Checked	Stephen Griffiths

This report has been prepared by The Permitting Company Limited with all reasonable skill, care and diligence, and taking account of the Services and Terms agreed between The Permitting Company Limited and the Client. This report is confidential to the Client, and the Permitting Company Limited accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by The Permitting Company Limited beforehand. Any such party relies upon the report at their own risk. The Permitting Company Limited disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of Services.

Version Control Log

Revision	Date	Made by	Checked by	Description
01	06/02/26	KB	SG	Initial creation

The Permitting Company Limited
Office 62
Wilkinson Place
Witney
Oxfordshire
OX28 6JT

Contents

1. Introduction

The Permitting Company Limited (TPC) was commissioned by Alan Skinner (Sole Trader Trading as Premier Tyres) (Alan Skinner, the 'Operator' or the 'Client') to prepare an Environmental Risk Assessment (ERA) for its waste facility located at Atlantic Works, Oakley Road, Southampton, SO16 4LL (the 'Facility', or the 'Site'). The ERA has been prepared in support of the Client's application for an Environmental Permit.

The operator currently operates under a T8 exemption for the mechanical treatment of end-of-life tyres. The site is applying for a bespoke permit application of which has been built in line with the criteria of SR2015 No13, the reasoning that the operator cannot apply for the Standard Rules is due to its proximity of a BAP (Biodiversity Action Plan) protected woodland area.

The objective of the ERA is to identify the scenarios where pollution to air, water or land could occur, particularly where there is the likelihood of an accident. The Environmental Risk Assessment (ERA) has been carried out based on the Environment Agency's (EA) EPR H1 Guidance.

In accordance with the aforementioned guidance, the ERA is structured as follows:

1. Identification and consideration of risks for the facility and sources of the risks.
2. Identification of receptors (people, animals, property and anything else that could be affected by the hazard) at risk from the Facility.
3. Identification of possible pathways from the source of the risks to receptors.
4. Assessment of the risks relevant to the specific activities carried out at the site and consideration of which risks can be screened out as negligible.
5. Description of measures to control identified risks.

2. Identification of Environmental Risks

Source-Pathway-Receptor Concept

In order for pollution to have an impact on the environment, a pollution linkage must be present which relies on the Source-Pathway-Receptor concept, where all three factors must be present and linked for a potential risk to exist.

A 'pollution linkage' requires the following:

- A 'source' is a substance which is in, on or under the land and which has the potential to cause significant harm to a relevant receptor, or to cause significant pollution to controlled waters.
- A 'receptor' is something that could be adversely affected by a contaminant, for example a person, an organism, an ecosystem, property, or controlled water.
- A 'pathway' is a route by which a receptor is or might be affected by a contamination.

Identification of the source, pathway and receptor enables management interventions to be made to manage the environmental risks and avoid pollution reaching the receptor.

In this section the potential sources (environmental risks) of pollution at the Facility are identified and screened for their significance, and the potential pathways and receptors are identified.

Environmental Risk

The operator is required to identify the environmental risks (source of potential contamination) which could occur during the operation of the Facility, including any risks which may arise from accidents. The EA online guidance stipulates that the Operator must consider the following potential risks:

- Any discharge (e.g. sewage or trade effluent to surface water or groundwater)
- Accidents
- Odour
- Noise and vibration
- Uncontrolled and unintended ('fugitive') emissions (for which risks include dust, litter, pests and pollutants that shouldn't be in discharge)
- Visible emissions

In considering the risks, the Operator can determine that a potential risk is not considered to be significant in terms of its potential impact on the environment, however a justification must be provided for any risk which is 'screened out'.

Based on the guidance summarised above, the potential environmental risks at the Facility have been identified and have been determined either significant or not significant based on the potential environmental impact arising from the risk. A summary of the risks is presented in the table below which also provides justification where risks are considered to be insignificant. The risks which have been identified as significant have been included in the risk assessment in Section marked 'Risk Assessment Methodology' of this report.

Table 1: Screening of Environmental Risk

Environmental Risk	**Applicability**	**Justification**
Controlled discharges to surface water	Not Applicable	There are no controlled discharges to surface water from the Facility. This risk has not been considered for further assessment.
Controlled discharges to groundwater	Not Applicable	There are no controlled discharges to groundwater from the facility. This risk has not been considered for further assessment.
SPZ1	Applicable	
Accidents	Applicable	Plant and equipment failure: the failure of plant or equipment may result in an incident occurring which could potentially impact on the environment. Fire and potential for firewater runoff. Material handling: Wastes to be processed will be stored in a dedicated storage bay or container. Wastes will be transported across the Facility via HGV's and Plant. Raw Materials are stored within drums and other containers in dedicated storage areas within the building. There is the potential for accidents (e.g. spills, leaks etc.) which may result in contaminated run-off. Vandalism: The facility is in a mixed commercial and industrial setting. The risk of vandalism cannot be discounted. Operator Error: All processing plant is manually operated, and the potential for operator error cannot be ruled out.
Odour	Applicable	The operations will be covered in the EMS to put systems in place to not allow odours wastes onto site. The risk will be low due to the nature of the waste type.

Noise and Vibration	Applicable	Operations at the Facility have the potential to produce noise if not appropriately managed. In particularly the movements of Heavy Goods Vehicles making deliveries to and collections from site.
Visual Impact	Not Applicable	All operations will be operated within a four-sided building and all wastes to be stored within the building.
Emission to air and water	Applicable	Fugitive emissions of dust and odour may be generated during the movement of materials around the site. The building is sealed and is not connected to a drain. Storm water discharges: storm water run-off from the sites roofs and yard area is directed into a dedicated surface water outlet. This is done outside of the permitted area.
Controlled releases to air	Not Applicable	The facility does not have any controlled air emissions systems in place in line with their operations, as the operation does not give rise to airborne emissions.
Global Warming Potential	Applicable	Indirect emissions arise from the use of electricity, and water. There are no direct emissions produced by the facility.
Facility Waste	Applicable	Wastes will be produced at the Facility as a result of the production processes, maintenance and administrative functions.

3. Parameters

Parameter 1

These permitted activities:

- R3 – recycling and reclaiming organic substances which are not used as solvents.
- R4 – recycling and reclaiming metals and metal compounds.
- 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).

Parameter 2

The permitted waste types:

- are restricted to those listed in Tables 2.3a and 2.3b of the permit (EWC 16 01 03 – End-of-life tyres).

Parameter 3

Quantity of waste accepted at the facility is restricted to:

- less than 21,000 tonnes each year
- No more than 100 tonnes of end-of-life tyres can be stored at any one time.
- Treatment and storage of end-of-life tyres will be carried out in a building. Treatment must be for the purpose of recovery of the waste, and is limited to manual sorting, baling.

Parameter 4

All waste listed in Table 2.3a of the SR shall be stored and treated on an impermeable surface with sealed drainage system which meets a design standard.

Waste listed in Table 2.3b of the SR may be stored and treated on either hardstanding or on an impermeable surface with sealed drainage system.

Parameter 5

The only point source discharges to controlled waters are clean surface water from the roofs of buildings and from areas of the facility not used for the storage or treatment of wastes. No other direct or indirect discharges are permitted.

Parameter 6 to 7

The activities shall not be carried out within:

- 200 metres of a European site (within the meaning of Regulation 8 of the Conservation of Habitats and Species Regulations 2017) or a Site of Special Scientific Interest, including candidate or proposed sites or Maritime Conservation Zone
- 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Monument – site lies within 50m of a BAP therefore the bespoke application is required
- 50 metres of a site that has species or habitats of principle importance (as listed in Section 41 of the Natural Environment and Rural Communities Act 2006) that the Environment Agency considers at risk to this activity, these are also often referred to as priority habitats and species – the site is within 50 meters of a BAP, this is why a the bespoke permit route is needed.
- 50 metres of any well, spring or borehole used for the supply of water for human consumption, including private water supplies
- a groundwater source protection zone 1

4. Identification of Receptors

A receptor is defined as something that could be adversely affected by a pollutant. Based on desk-based research, information provided by the Client and the information relating to the environmental setting (provided in the SCR), TPC has identified the receptors within the vicinity of the site. A summary of the identified receptors is provided in the table below.

Table 2: Summary of Identified Receptors

Receptor	Location
Groundwater: Desk study indicates the site is underlain by permeable superficial deposits (River Terrace Deposits comprising sand and gravel) and the wider area includes a productive superficial aquifer. The underlying bedrock is classified as a Secondary A aquifer (intergranular flow). Groundwater vulnerability is reported as medium**;** therefore groundwater is considered a relevant controlled waters receptor and potential pathways (e.g., via defects in surfacing/drainage, service trenches or unsealed areas) must be appropriately controlled. No Source Protection Zones are identified within 500 m and no licensed groundwater abstractions are recorded within 1 km.	On site and in the immediate vicinity.
Surface Water: The nearest named surface water receptor is Tanners Brook, located approximately 48 m north-west of the site. Given the proximity of this receptor, uncontrolled releases or contaminated surface water runoff could potentially migrate via overland flow or drainage connections, particularly during heavy rainfall or flood conditions.	Within 1km of site
Ground: The permit area is predominantly sealed by hardstanding. Site photographs indicate the operational footprint comprises a concrete slab internally and concrete hardstanding externally, with no exposed ground observed in the main working areas. Localised staining is visible in places consistent with historic/operational use, however no widespread contamination or evidence of active leaks is apparent from the visual inspection evidence provided. Minor cracking and edge deterioration are visible locally within the yard and should be maintained to prevent the development of preferential infiltration pathways. **Bedrock:** The underlying bedrock geology is recorded as the Wittering Formation**,** described as sandstone and siltstone**.** The bedrock is associated with intergranular flow and forms part of a Secondary A aquifer designation locally, meaning groundwater remains a relevant receptor for protection under the permit.	On site and in the immediate vicinity.

Atmosphere: No site-specific air quality constraints (e.g., AQMA designation or background pollutant concentrations) have been confirmed within the desk-study dataset reviewed for this SCR/ERA. The site is located within an established industrial area; therefore, the principal relevant atmospheric considerations for the proposed activity are expected to relate to operational emissions such as dust, vehicle exhausts and smoke/particulates in the event of fire.	On site and in the immediate vicinity.
Designated Ecological Sites: Desk-study screening identifies a BAP Priority Habitat woodland adjacent to (or immediately near) the site, which is considered a local ecological receptor that could be affected by polluted runoff or spill mobilisation if pathways exist. In addition, the wider area contains statutory ecological designations within 2 km, including records of SSSI**,** Ramsar**,** SAC and SPA designations. While these are not necessarily directly connected to the site, they reinforce the need to prevent releases to controlled waters and to maintain effective surface water and spill controls. Adjacent to site (BAP woodland) and within 2 km of site (statutory designations).	Within 2km of site
Human Occupation: The site is located in a predominantly industrial/commercial setting within Southampton, with surrounding land uses comprising industrial and commercial premises and associated transport activity. Potential human receptors include site operatives and visitors on site, neighbouring workers at adjacent commercial/industrial premises, and members of the public using surrounding access routes.	Within 1km of the site

5. Potential Pollution Pathways

Identification of Possible Pathways from the Sources of the Risks to Receptors

The potential pollution pathways between the source identified (excluding those which have been screened out) and the receptors identified are summarised in the table below.

Table 3: Potential Pollution Pathways

Source	Potential Pathway	Receptor
Odour: arising from the waste materials.	Through the air.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Noise and Vibration: arising from vehicle movements, site operations and process machinery.	Transmitted through the air and through ground vibration.	Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Accidents: including plant or equipment failure, materials handling, vandalism, operator error, fire and flooding.	Over site surface, through site drainage systems and through the air.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the Facility.
Fugitive Emissions: including dust, odour, litter and surface water run-off.	Through the air, windblown over Facility surfaces, through Facility drainage systems.	Surface water; Groundwater; Ground; Atmosphere, and Humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes /

		roadways surrounding the Facility.
Controlled release to air: from point source	Through the air, windblown.	Atmosphere, and humans including: Facility workers/visitors; workers on adjacent premises; local residents; intermittent presence on pedestrian routes / roadways surrounding the site.
Global Warming Potential: from fossil fuels.	Through the air.	Atmosphere.
Facility Waste: wastes arising as a result of production process, maintenance and administrative functions undertaken at the facility.	Windblown over ground, surface water run-off.	Groundwater; surface water; ground; and atmosphere.

6. Risk Assessment Methodology

The risk assessment provides a simple representation of the hypothesised relationships between contaminants, pathways and receptors. This allows the identification of potential contamination linkages and, therefore an interpretation of the potential for pollution to occur at the Facility or within the vicinity of the site as a result of the activities at the Facility.

The potential for pollution to occur at the site is determined by assessing the likelihood of an identified receptor being exposed to pollution emanating from a source at the Facility and the resultant consequences of any such exposure. In determining the likelihood and the consequence of a pollution exposure the risk management techniques which are used at the Facility, and the effect on any such exposure are considered. Where the risk management techniques are considered to have a mitigating impact, the resultant overall likelihood of the pollution exposure occurring and its consequences on a receptor are lowered.

Assessing likelihood and consequences

Within the risk assessment, each hypothesised relationship between contaminants, pathways and receptors is assessed to determine the likelihood of the receptor being exposed to pollution and the consequences of exposure using the rankings listed in the tables below.

Table 4: Likelihood Ranking

Very Low	Low	Medium	High
Exposure to pollution is considered to be highly unlikely	Exposure is considered to be unlikely	Exposure is considered to be likely	Exposure is considered to highly likely to occur

Table 5: Consequence Ranking

Very Low	Low	Medium	High
No impact or imperceptible impact on the receptor.	Low level impact easily and quickly mitigated or may not require any intervention to rectify any impact.	Moderate impact which will not be rectified without some mitigation/ intervention.	High impact requiring significant intervention/mitigation and may have caused irreparable damage to the receptor.

Assessment of Risk

Following the determination of the likelihood and consequence ranking for the hypothesised relationship development using the source-pathway-receptor concept, the matrix in the table below is used to determine the overall risk of the pollution exposure occurring.

Table 6: Risk Matrix

		Likelihood			
		Very Low	**Low**	**Medium**	**High**
Consequence	**High**	Low	Medium	High	High
	Medium	Low	Medium	Medium	High
	Low	Low	Low	Medium	Medium
	Very Low	Very Low	Low	Low	Low

7. Risk Assessment

Odour

The potential sources of odour at the Facility have been identified and used to develop the risk assessment.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Odour: receiving waste materials	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Fugitive emissions to air	The EMS includes strict waste pre-acceptance and acceptance procedures.	Low	Low	Low

Noise

The potential sources of noise at the facility have been identified and used to develop the risk for noise.

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Noise: arising from the movement of heavy goods vehicles (HGV) and engine noise/alarms from other vehicles working on and visiting the site.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air and the ground vibration	A site speed limit of 10 miles per hour will be in operation across the Facility to minimise engine noise. Deliveries are timed so that vehicles will not 'back up' waiting to get onto the site. A no idling policy will be enforced on-site and vehicle users will be required to switch off their engines when not in use. The site has been designed so that vehicles delivering and removing waste will either not have to reverse, or the reversing will be kept to an absolute minimum by minimising the amount of maneuvering needed Routine inspection and maintenance of roads.	Low	Low	Low

Noise and Vibration: arising from the internal handling of raw materials and equipment.			All waste will be handled with care when being loaded or unloaded. Drop heights will be minimised to reduce the impact of waste hitting site or vehicle surfaces and care will be taken to ensure any manual handling. Deliveries are only received during normal working (daylight) hours as detailed within the planning permission. The working hours are between 07:00 and 18:00 Monday to Friday and 09:00 and 13:00 Saturday. Routine inspection and maintenance of equipment.	Low	Low	Low

Accidents

The risk assessment for accidents at the site

Source-Pathway-Receptor Hypothetical Model			Risk Management Techniques	Assessing the Risk		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Accidents: Leaks and spillages	Ground	Over surface and through drainage systems	Regular maintenance will be undertaken on all plant and equipment in accordance with the manufacturer's guidance. Daily plant checks will be undertaken to identify and respond to any defects/leaks. Spill kits will be provided, and staff will be fully trained on their use. In the event of a spill or leak that could cause risk to the environment, the Site Manager will be informed. If necessary, works shall cease while measures are put in place to remediate the leak or spill and the Environment Agency will be informed. Emergency response procedures will be in place at the site including leaks and spillage.	Very Low	Medium	Low
	Groundwater			Very Low	Medium	Low
	Surface Water			Very Low	Medium	Low

Accident: Plant failure and breakdown	Ground	Through facility drainage system	All plant will be checked on a daily basis, and any issues reported immediately. All internal areas of the Facility feature impermeable surfaces. Spill kits will be available in key risk areas. A spill response procedure will be defined in the site's Accident Management Plan featured within the EMS. The site will keep critical spares for important plant or parts so that minimal disruption will be experienced in the event of plant failure or breakdown. Contracts are in place for plant and equipment with local main agents in the event of a breakdown, replacement, or repairs. In the event of prolonged plant failure that could lead to environmental impact, site operations may temporarily cease, and any incoming vehicles will be diverted to an alternative (off-site) permitted facility for treatment. All vehicles and plant will be turned off when not in use.	Very Low	Low	Low
	Groundwater			Very Low	High	Medium
	Surface Water			Very Low	Low	Low
Accidents (Vandalism): Damage/theft of externally located equipment/tanks	Ground	Over Facility surfaces, and through drainage systems,	CCTV will cover the site, which will be secured by fencing and with authorised access only. Site will be kept locked at all times when the site is not operational.	Very Low	Low	Low

	Groundwater		The Facility will be manned between the hours of 07:00 to 18:00 from Monday to Friday and between the hours of 09:00 and 13:00 on a Saturday. CCTV will be monitored by an external company appointed by the estate. Internal cameras will be monitored by Premier Tyres Staff. when the site is not manned, automatic alerts will be sent through to the TCM and business owner. There is limited potential for contamination to reach surface water from accidents and vandalism.	Very Low	Low	Low
	Surface Water			Very Low	Low	Low
Accidents (Fire): Fire and arson attacks	Grounds	Over Facility surface, through the air and through the drainage system.	Strict waste pre-acceptance and acceptance procedures will be put in place to minimise the risk of non-compliant wastes being accepted. The operator will undertake regular maintenance of plant and equipment in accordance with the manufacturer's guidance. Firefighting equipment will be available on site for handling small fires. Infrastructure will be designed in line with the FPP requirements. All chemicals will be stored in accordance with manufacturers guidance within a dedicated chemicals storage area inside the building. FPP will be reviewed regularly to make sure the procedures are reflective of the risk and activity at the site.	Medium	Medium	Medium
	Groundwater			Medium	High	Medium
	Surface Water			Medium	Medium	Medium

	Atmosphere			Medium	Medium	Medium

Fugitive Emissions

The risk assessment for fugitive emissions is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Fugitive Emissions: dust, mud and odour	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All incoming and outgoing vehicles will be sheeted or covered to prevent any load loss. Management plans are in place and monitoring will be undertaken. Waste pre-acceptance and acceptance procedures ensure that potential dusty loads are rejected. Drop heights will be minimised were possible.	Low	Medium	Low
	Atmosphere			Low	Medium	Low
Fugitive Emissions: contaminated surface water run-off from external areas.	Surface Water	Through drainage system	The permitted area is sealed and within the building.	Low	Medium	Low
	Ground Water			Low	Medium	Low

Controlled Releases to Air

The risk assessment for controlled releases to air is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Controlled Release to Air: (number) extraction points from the (locations)	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	Currently no controlled release to air.	Very Low	Very Low	Very Low
	Atmosphere			Very Low	Very Low	Very Low

Global Warming Potential

The risk assessment for Global Warming Potential is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Global Warming Potential: use of grid-sourced electricity to support production processes resulting in in-direct emissions of greenhouse gasses.	Atmosphere	Through the air	Energy consumption will be monitored Site will act in accordance with the Climate Change Adaptation Assessment	High	Very Low	Low

Facility Waste

The risk assessment for Facility Waste is presented in the table below.

Source-Pathway-Receptor Hypothetical Model			**Risk Management Techniques**	**Assessing the Risk**		
Source of Pollution	**Receptor**	**Pathway**		**Likelihood of Exposure**	**Consequence of Exposure**	**Overall Risk**
Facility Waste: Wastes which arise from production and administration activities at the site comprising: mixed recyclables, general waste, wood, cardboard and hazardous waste.	Humans including facility workers/visitors, workers on adjacent premises, local resident, intermittent presence on pedestrian routes/roadways surrounding the Facility.	Through the air	All wastes produced at the Facility will be segregated and provided with suitable containment. All wastes will be stored within a dedicated recycling and waste area.	Low	Low	Low
	Surface Water	Over Facility surface and through drainage systems				

	Groundwater					
	Ground					

8. Environmental Risk Assessment Conclusion

TPC has identified the potential environmental risk at the Facility and determined the potential environmental impact arising from each risk. The assessment has demonstrated that with the appropriate management controls in place, risks identified are acceptable.

Appendix 9 – Contingency Plans/Incident Response Plan

Issue No. 01	Emergency Procedures and Contingency Plans	Premier Tyres

This document contains the procedures for which all Premier Tyes personnel must follow in the event of an emergency.

All wastes must be handled and treated with care. Premier Tyres have control measures in place which reduce exposure to hazards so far as is reasonably practicable. Whilst Premier Tyres strive to keep the highest standards, this document outlines the procedures which must be followed in foreseeable events of an emergency in line with the companies' policies and Environmental Agency Permit.

Potential Incident	Action Required
Unauthorised waste	Notify your manager/supervisor/TCM immediately Refuse/reject waste – do not handle the waste under any circumstances Take photographs as evidence where possible Complete the consignment note or waste transfer note stating the reason for rejection Complete an unauthorised/rejected waste form Contact the client to make aware of the situation Send all documentation to your manager/TCM Contact the Environment Agency where appropriate
Fire on site	Refer to the companies FPP and Fire Evacuation Procedures in the first instance. This will set out the core procedures to follow. Raise the alarm/notify others that a fire has occured Evacuate all personnel on site to the muster point Contact the emergency services Notify your manager immediately If the fire can be contained - only trained personnel use fire extinguishers, if the fire doesn't extinguish then evacuate immediately Contact the Environment Agency as soon as possible (no longer than 24 hours)
Injury sustained to personnel on site	A trained first aider is to administer first. Contact the emergency services and inform them of the injured person and details of the site. Ensure all procedures are followed prior to the emergency services attending. Close the transfer station to all other personnel Where applicable, all personnel are to remain calm and collective. inspect all areas to ensure there are no obvious hazards Complete an accident/incident form and gather as much information as possible Where applicable, notify under RIDDOR
Flooding based on Environment Agency indicative floodplain maps	Site lies within defended flood zone. Has between 01% and 1% chance of flooding The site will register with the EA's flood warning advisory service.

Potential Incident	Action Required
Extreme weather leading to localised flooding	This event is unlikely, the size of vehicle using the road should still have access. Divert waste to other facilities. Continue to process waste on site.
Extreme Weather (Named Storm or Amber or Red Warning)	Site Manager will check weather forecast daily. If a named storm, amber or red warning is issued for the site locality, the Site Manager will check if the weather can have an impact on access to the facility from incoming or outgoing waste vehicles. If known floods on main access roads are likely, Premier Tyres will establish the best course of action to take e.g. alternative routes, cancelling loads in, etc.
Plant breakdown	The plant will be checked daily before use. There will also be a maintenance programme for plant. Any defects will be recorded and repaired. In the event of a break down the site manager will establish how long the repair will take. If the site operatives can repair the plant or machinery, the site will continue to accept waste up to the limits set within the Permit. Once the limits have been reached, the operator will inform its drivers and third party deliveries to divert to another facility. Waste acceptance will recommence once the equipment has been repaired and the existing waste has been processed to free up capacity.
Spillage	Determine the material involved and seek material data sheet if necessary; refer to Control of Substances Hazardous to Health (COSHH) register. Seek assistance dependant on level of spill If there is danger to individuals, or you are unsure, evacuate the area and contact the TCM or the out of hours contact and give the following information: a. Location of the spill b. Name of substance spilt c. Nature/source and volume of spillage d. Any injury or suspected injuries If there is no immediate danger, and the material is still leaking, or spilling collect the appropriate spill kit necessary to contain the spill. Take appropriate action to stop the flow (close valve, plug leak etc). Personal Protective Equipment (PPE) must be worn To prevent the spill entering groundwater it may be necessary to either cover or bund the relevant access point before containing the spill Contain the spill to prevent further spread using appropriate absorbing materials such as absorbent booms, socks or sand. If some material has entered the surface water drain or a watercourse, contact the Head of Sustainability and out of hours emergency contact. Absorb and collect the resultant material. Place all contaminated clean-up materials in a hazardous waste bin available within the spill kit. This must be stored and disposed as hazardous waste

The manager must report all incidents where information can be used to discuss further preventative measures during senior management meetings and health and safety meetings. All information must be obtained for any potential HSE/EA investigations.