Permit Variation Application

Kingpin Recycling Limited

Unit C8 Wem Industrial Estate,
Soulton Road,
Wem,
Shropshire
SY4 5SD

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Document Control Table

Project Reference	19/013K
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Change log

Version	Changes	Produced by	Checked by	Date
1	Original permit variation report.	Bethany Stott	Tracey Westbury	21 July 2022
2	Updated to include site infrastructure changes, additional waste codes and additional treatment activities. Updates to- Section 1 1.3-1.6, 1.11, 1.14, 1.15, Section 3 3.1-3.14, Addition of Section 4. Section 5 5.12 Section 6 6.1-6.9.	Lauren Raby	Tracey Westbury	22 January 2024

1. Contents

Drawings

Drawing No. 19/013k 001	Extended Permit Boundary Plan
Drawing No. 19/013k 002	Extension Area
Drawing No. 19/013m 001 V4	Fire Prevention Layout Plan
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Appendix 1	Evidence of Technically Competent Management
Appendix 2	Dust Management Plan, Version 2
Appendix 3	Fire Prevention Plan Version, 4
Appendix 4	Site Condition Report
Appendix 5	Environmental Risk Assessment, Version 2

1. Introduction

1.1. Westbury Environmental Ltd have been instructed to prepare this Environmental Permit variation application on behalf of Kingpin Recycling Ltd (Operator).

1.2. The application seeks to vary the existing bespoke Environmental Permit Ref. EPR/XP3495CT (Permit) at Unit C8, Wem Industrial Estate, Soulton Road, Wem, Shropshire, SY4 5SD (Site).

1.3. The purpose of the permit variation application is to:

- Extend the Permit boundary,
- Add waste codes, see Table 4.1 Proposed List of Waste Codes,
- Increase the amount of waste stored on Site at any one time,
- Add the treatment operations below;
  - shaving,
  - baling,
  - sidewall cutting,
  - shearing,
  - rim-removal and
  - pressure testing.

1.4. Version 1 of the Permit Variation Application applied to and references the transfer of the Permit. The transfer of the permit from Kingpin Tyres Ltd to Kingpin Recycling Ltd was issued on 22nd March 2023.

1.5. Version 1 of this Application Report was submitted to extend the boundary of the Site.

1.6. Version 1 of the Application Report was updated to include the addition of the changes listed above (Version 2).

1.7. The Application Report Version 2 will be the Application Report determined by the Environment Agency as part of the Permit Variation Application.

1.8. The proposed permit boundary is shown on Drawing No. 19/013k 001 Extended Permit boundary plan.

1.9. It is considered that this permit variation application will comprise a normal variation in accordance with the Environmental Permitting Charges Guidance (April 2022).

1.10. The relevant Environment Agency forms (Part A, Part C2, Part C4, Part F1) and supporting information are included within this Environmental Permit application report.

Background

1.11. The original permit for a materials recycling facility was issued to Kingpin Tyres Limited in August 2006.

1.12. A permit variation was later issued in June 2015 to update the permit to modern conditions and increase the storage capacity.

- No more than 593 tonnes of shredded tyres shall be stored on site at any one time.
- No more than 50,000 individual tyre units shall be stored on site at any one time.

1.13. The Permit was then partially surrendered in January 2022, altering the permit boundary.

1.14. The Permit was transferred from Kingpin Tyres Ltd to Kingpin Recycling Ltd in March 2023.

1.15. This application now seeks to extend the Permit boundary, add waste codes, and add treatment activities.

1.16. The extended boundary will include the area that was formally covered by a S2 exemption for the storage of tyres.

2. Site Location and Setting

2.1. The existing permit boundary extends to approximately 0.5ha. The proposed boundary extension will increase the permitted area to approximately 1ha.

2.2. The Site is not located on a principal designated bedrock aquifer but is located on a secondary A superficial aquifer.

2.3. The surrounding land-uses include agriculture and deciduous woodlands, a variety of businesses within the industrial estate, residential areas of Wem and a railway line. There are areas of deciduous woodland close to the Site. There are no other areas of special environmental designation in close proximity to the Site.

2.4. There has been no significant change to the land use on Site and the surrounding area (industrial estate) for the past 20 years.

2.5. The Site is within a local authority designated AQMA however the closest AQMA boundary covers Shrewsbury town centre 16km south of the Site boundary. The Shrewsbury town AQMA is designated for NO_x.

2.6. The Site is unlikely to significantly contribute pollution (NOx) to this AQMA as recycling activities will not emit significant quantities of NO_x.

3. Non-Technical Summary

3.1. This Environmental Permit variation application seeks to vary the existing Permit Ref. EPR/XP3495CT to:

- Extend the Permit boundary,
- Add waste codes, see Table 4.1 Proposed List of Waste Codes,
- Increase the amount of waste stored on Site at any one time,
- Add the treatment operations below;
  - shaving,
  - baling,
  - sidewall cutting,
  - shearing,
  - rim-removal and
  - pressure testing.

Proposed Operations

3.2. Waste will be brought onto the Site in HGV vehicles.

3.3. End-of-life tyres are unloaded into the Reception Area. The end-of-life tyres are then taken to be treated and then taken to their designated storage area.

3.4. If a load arrives onto Site that contains only one type of waste, this is put straight into a bay for storage.

3.5. If a load contains end-of-life-tyres, mixed with other waste, then this will be put into the Reception Area, then sorted, and put into designated bays.

3.6. The following treatment activities are carried out on Site currently:

- Sorting/ separation- Grading of tyres based on quality to identify the best processing method.
- Shredding.
- Chipping.
- Granulating.

3.7. The following treatment activities will be carried out on Site:

- Shaving,
- Baling,
- Sidewall cutting,
- Shearing,
- Rim-removal and
- Pressure testing.

3.8. There will be a three-sided building on Site, see Drawing No. 19/013m 001 V4 Fire Prevention Layout Plan.

3.9. It is proposed that the following treatment activities will be carried out within the building:

- Shredding,
- Chipping,
- Granulating and
- Shaving.

3.10. It is proposed that the following treatment activities will not be carried out within the building:

- Sorting/ separation- Grading of tyres based on quality to identify the best processing method,
- Sidewall cutting,
- Pressure testing,

- Baling,
- Shearing and
- Rim-removal.

3.11. End-of-life waste tyres are treated and recovered on Site. Tyre shred products are produced in accordance with the Quality Protocol: Tyre derived rubber materials and PAS 107 Specification. Baled tyre products are produced in accordance with PAS 108 Specification.

3.12. Contravening waste types that are identified within incoming waste will be removed and stored within the Quarantine Area.

3.13. The Environmental Management System (EMS), which includes a Waste Acceptance Procedure, ensures that suitable waste types are accepted on to the Site. The Waste Acceptance Procedure includes strict waste acceptance criteria which ensure that only permitted waste types are accepted.

3.14. The total storage capacity on Site will be 5,500m^3 for tyre shred, whole tyres, and rubber.

4. Proposed List of Waste Codes

4.1. The proposed list of additional waste codes that will apply to the Site are included in Table 4.1 Proposed List of Waste Codes.

Table 4.1 Proposed List of Waste Codes

Waste code	EWC Code Description	Description of waste accepted onto Site
07	**Wastes from organic chemical processes**	
07 02	**Wastes from the MFSU or plastics, synthetic rubber and man-made fibres**	
07 02 13	Waste plastic	
08	**MFSU of Coatings/Adhesives/Inks**	
08 04 10	Waste adhesives and sealants other than those mentioned in 08 04 09.	
12	**Shaping/Physical Treatment of Metals/Plastics**	
12 01 05	Plastics shavings and turnings	
15	**Packaging, Absorbents, Wiping Cloths and Filters**	
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02.	
16	**Other wastes from industrial processes**	
16 01	**End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance**	
16 01 03	End-of-life tyres	
16 01 22	Components not otherwise specified.	Rubberised Tracks from excavators and construction plant
16 02 14	Discarded equipment other than those mentioned in 16 02 09 to 16 02 13.	Metal bonded rubber mountings post-manufacture and post-consumer-
		Rubber Seals, gaskets, O-ring use post-manufacture and post-consumer
16 03 06	Organic wastes other than those mentioned in 16 03 05.	Waste rubber hose and tubing post-manufacture and post-consumer
		Waste hydraulic pipes post-manufacture and post-consumer
		Waste rubber matting, underlay, and sheeting
		Rubber from medical seal manufacture
		Rubber Seals, gaskets, O-ring use post-manufacture and post-consumer
17	**Construction and demolition waste**	
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03.	Used rubber play surfaces
		Rubber traffic system waste (speed bumps, barriers, stops, etc.) post-manufacture and post-consumer
		Used astro-turf with rubber
		Rubber from construction and demolition activities
		Rubber block from temporary fencing post-manufacture and post-consumer
		Rubber blocks from railway tracks post-manufacture and post-consumer

Waste code	EWC Code Description	Description of waste accepted onto Site
		Metal bonded rubber mountings post-manufacture and post-consumer-
19	Materials from Waste and Water Treatment	
19 10 06	Other fractions other than those mentioned in 19 10 05.	Waste hydraulic pipes post-manufacture and post-consumer
19 12	**Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified.**	
19 12 02	Ferrous metal (uncontaminated tyre wire/tyre rim only)	
19 12 03	Non-ferrous metal (uncontaminated tyre wire/tyre rim only)	
19 12 04	Plastic and rubber.	Recovered rubber chip from granulation of rubber scrap
		Plastic & Rubber Waste from Waste Management Facilities
19 12 12	Mechanically treated tyre wire / tyre rim containing rubber only	
20	Municipal Waste and Similar Materials from Commerce and Industry	
20 01	**Separately collected fractions (except 15 01)**	
20 01 10	Clothes.	Rubber footwear and clothing post-manufacture and post-consumer
20 01 11	Textiles.	Rubber footwear and clothing post-manufacture and post-consumer
20 01 39	Plastics.	Conveyor belts
20 03	**Other municipal wastes**	
20 03 07	Bulky waste	Bulky wastes (conveyor belts etc.)
		Unvulcanised rubber from industrial post-manufacture and post-consumer
20 03 99	Municipal waste.	Waste rubber matting, underlay and sheeting
		Rubber Seals, gaskets, O-ring use post-manufacture and post-consumer
		Unvulcanised rubber from industrial post-manufacture and post-consumer
		Rubber from medical seal manufacture

5. Site Management

Environmental Management System

5.1. Kingpin Recycling Ltd will operate the permitted activities on Site under an EMS.

5.2. A hard copy of the EMS is kept on Site at all times.

5.3. The EMS folder includes a copy of the Environmental Permit along with the following section:

Environmental Management System Report

5.4. This report contains a description of the purpose and scope of the EMS, all Site details including the location of the Site, receptors located in close proximity to the Site boundary, waste storage, the plant and equipment that is used on the Site, the different types of waste treatment activities carried out on Site, the Site security measures, information on the competence of the staff working on Site, roles and responsibilities for each member of staff and details for Site closure.

Site Condition Report

5.5. This is used to record the condition of land covered by the Environmental Permit at various stages during the life of the permit.

Environmental Impacts and Controls Assessment

5.6. This assessment provides information on the processes, activities and equipment on site, the potential emissions and impact that they may have on air, water, energy usage, waste disposal, land contamination, nuisance, and resource consumption and how any identified impact may be controlled.

Environmental Accident Management Plan

5.7. This report contains an assessment of the potential accidents that could occur on Site, details of the likelihood of each accident occurring, the preventative measures taken to reduce the risk of each accident occurring, actions to be taken in the case of an accident on Site and an explanation on how to record any accidents that occur on Site. The types of accident included in this report include:

- Leaks or Spillages
- Fire
- Flooding
- Unauthorised Entry
- Failure of Plant and Equipment
- Cross-Contamination
- Failure of Services

Flood Management Plan

5.8. This report contains a brief description of the site, its size, the key contacts to contact in an emergency, whether there are staff employed with any special needs, the locations of any gas, water and / or electric cut off points of Site and ways to keep all plant and computers / files safe in the event of a flood.

Authorisations

5.9. A copy of the permit and EA Registrations for the site will be found in the EMS.

Technical Competence

5.10. This section of the EMS includes details of the competence status of the Technical Competent Manager(s) (TCM), the operational hours for the Site, the minimum attendance requirements for the TCM and copies of relevant certificates.

Procedures and Forms

5.11. The EMS contains a number of procedures that cover its implementation, waste acceptance, operations controls and emergencies. Records to be produced in accordance with these procedures are provided in the EMS as forms. These completed forms provide records that evidence the implementation of the EMS. The following list details procedures that are included in the EMS.

Implementation

- Environmental Training, Awareness and Competence
- Compliance with Legal requirements
- Staff Organogram

Operational Control

- Housekeeping, litter, pests, and vermin
- Noise Control
- Waste storage and Handling
- Site Security
- Reporting and Investigation of Accidents, Incidents and Complaints
- Dust, Fibres and Particulates
- Maintenance

Waste Acceptance and Rejection

- Waste Acceptance
- Waste Rejection and Non-compliance
- Waste Reporting
- Duty of Care

Environmental Protection

- Dust Fibres and Particulate
- Mud and Debris
- Noise Control
- Surface Water Management

Emergency Provisions

- Environmental Accidents /Incidents / Complaints and associated forms
- Fire
- Flood
- Spillages
- Utility Failure

Reporting

- Waste Returns
- Notifications to the Environment Agency

- This list is not exhaustive.

Drawings

The drawings included in the EMS include:

- Site Boundary Plan showing the Site boundaries.
- Site Layout plan.
- Site Sensitive Receptors Plan.

Technical Competence Management

5.12. Paddy McBride and Jonathan Pugh are the Technically Competent Managers for the Site, see Table 5.1 Technically Competent Managers Information.

Table 5.1 Technically Competent Managers Information

TCM 1 First Name	Paddy
TCM 1 Last Name	McBride
TCM 1 Date of Birth	[redacted]
TCM 1 Phone	01939232156
TCM 1 Email	accounts@kingpin-recycling.co.uk
TCM 2 First Name	Jonathan
TCM 2 Last Name	Pugh
TCM 2 Date of Birth	[redacted]
TCM 2 Phone	07917957005
TCM 2 Email	operations@kingpin-recycling.co.uk

5.13. Copies of the Original WAMITAB Certificates for the Technically Competent Managers are included in Appendix 1 WAMITAB Certificates.

6. Environmental Risk and Site Condition

Environmental Risk

6.1. An Environmental Risk Assessment has been completed to support this Environmental Permit Application, see Appendix 5 Environmental Risk Assessment.

6.2. The Environmental Risk Assessment considers the risk associated with extending the Permit boundary, the additional waste codes, and the additional treatment activities.

6.3. The change to the permit boundary also means that some sensitive receptors will be closer to the permit boundary than previously. This has been considered as part of the Environmental Risk Assessment included within the EMS. However, since waste storage activities have previously been undertaken on this area of the Site, under an S2 exemption, it is not considered that the risk to sensitive receptors will significantly change.

6.4. It is considered that there will be an increase in the risk to the local environment and human health from the acceptance of the proposed waste types and additional treatment activities. This risk has been assessed in Appendix 5 Environmental Risk Assessment.

6.5. Robust risk management measures are implemented by way of EMS procedures to ensure the identified risks are minimised.

6.6. The Environmental Risk Assessment highlighted the need for a Dust Management Plan and a Fire Prevention Plan.

6.7. A Dust Management Plan has been prepared to identify the potential for dust emissions from the Site and mitigation measures which will be employed, see Appendix 2 Dust Management Plan

6.8. There have been no complaints from neighbours about nuisance from noise or dust during many years of operations at the Site.

6.9. A Fire Prevention Plan has been prepared to account for the change to the Site boundary, additional waste codes and additional waste treatment activities, see Appendix 3 Fire Prevention Plan.

Site Condition

6.10. A Site Condition Report part 1 has been prepared for the additional area of land to be included in the Permit, shown in drawing No 19/013k 002 Extension Area, see Appendix 4 Site Condition Report

Drawings

Drawing No. 19/013k 001	Extended Permit Boundary Plan
Drawing No. 19/013k 002	Extension Area
Drawing No. 19/013m 001 V4	Fire Prevention Layout Plan
Drawing No. 19/013f 001 V3	Sensitive Receptors Plan

Application form

Part A

Application form

Part C2

Application Form

Part C4

Application Form

Part F1

Appendix 1

Evidence of Technically Competent Management

Appendix 2

Dust Management Plan

Appendix 3

Fire Prevention Plan

Appendix 4

Site Condition Report

Appendix 5

Environmental Risk Assessment