

# CHAPTER 1

# SUMMARY

SECTION 1.4

NON-TECHNICAL SUMMARY

Applicant

Oversize Tyre Recycling Limited.

50b Disert Road, Draperstown,

Co. Londonderry, Northern Ireland,

BT45 7ND.

Company Registration Number :

NI692169

The Location /Address of the permitted facility is :


Sotheby Road Tyre Recovery Facility

51 Sotheby Road, Middlesbrough , Cleveland,

TS3 8BS

Site NGR is :

NZ 52427 20077

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Oversize Tyre Recycling Ltd. currently operate the Sotheby Road facility under a T8 Exemption. At the point of acquiring the business of Greenology ( Teesside ) Ltd. , it was of the understanding that a permit application for a bespoke permit was in progress and likely to be issued. Whilst a permit application had been made by Greenology – this was subsequently refused, but after control of the Company changed and the new management team took over.

The refusal of the permit was largely attributed to the actions of the former management team of Greenology ( Section 1.2 and 1.5- main application ) and since the new management team and OTR have controlled the facility – most such matters have been addressed , largely to the satisfaction of the Environment Agency . Significant steps to address compliance issues ( largely around storage volumes and stock control ) have been acknowledged by local officers.

The site is currently compliant with regard to storage volumes and throughputs ( CAR E form and emails – Appendix 6.)

An appeal by the new management team /operator against the decision to refuse the permit was unsuccessful. Although unsuccessful – dialogue between the EA and the new management team has taken place regarding a new application – as per Appendix 6. To ensure the continuation of the facility and safeguard the relevant jobs and operations – it has been determined that a ‘new’ application will be submitted .

Following a review of site operations, there are a small number of changes from the last application – but essentially the tyre recycling operation remains largely the same .

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REGULATED FACILITY

The Sotheby Road/OTR facility – is currently undertaking waste recycling operations under a T8 exemption . A T8 Exemption specifically allows and controls the recycling /recovery of waste tyres with specific restrictions on throughputs and storage volumes / Exemption details are included in Appendix 7.


The restrictions limit operations to , waste types :

Waste code	Type of waste
160103	End-of-life tyres
191204	Shredded or granulated end-of-life tyres only

And volumes to :

Volume	Time restriction
60t truck tyres ,or	7 day period
40t other tyres	7 day period

Within the 7-day limit, you must store the tyres in piles no bigger than 10 tonnes with a gap as a fire break between each pile.

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While OTR can currently operate within these controls, the restrictions on throughputs limit the potential to expand the business and serve key customers on demand – therefore a greater throughput is required .

The proposed tonnages for the facility – determined as feasible and that can be handled safely – without pollution , are :

WASTE TYPE	SUGGESTED EWC CODE FOR INCLUSION
Vehicle tyres ( Car and motorcycle/bicycle )	16 01 03
HGV tyres	16 01 03
Plant and machinery tyres ( tractor , forklift , plant etc.)	16 01 03
Rubber wheels from plant and machinery	16 01 03
Conveyor belts ( large industrial rubber belting and conveyance belts)	20 01 39 /20 03 07
Rubber seals and gasket	20 01 39 /20 03 07
Rubberised tracks ( caterpillar type tracks , and	20 01 39 /20 03 07/16 01 03
Rubber mountings,	20 01 39 /20 03 07
Shocks absorbing pads ( Rubber)	20 01 39 /20 03 07
Raw rubber	07 02 13
Tyre wire	19 12 02 + 19 12 03
Pre Shredded tyres	19 12 04


Note – see further Section on waste types and discussion re choice of EWC codes.

Up to 650 tonnes will stored on site at any one time.

The total volume of waste to be accepted annually will be 22500 tonnes .

Storage layouts and capacities are discussed further in Section 4.10 of the main application.

The proposed throughput and storage tonnages exceed the exemption and therefore an Environmental Permit is required.

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The standard Rules permit (SR2021 No 13: storage and mechanical treatment of end-of-life tyres for recovery) allows no more than 5,000 tonnes of end-of-life tyres to be accepted at any site each year and, no more than 100 tonnes of end-of-life tyres to be stored at any one time.

The standard rules permit only allows end of life tyres , and not other recyclable rubber products and associated wastes from other tyre recycling facilities .

As the exemption and standard rule storage and throughput thresholds are exceeded , and waste types do not match the standard rules requirements – a bespoke permit is required .


The operator will accept and store non-hazardous waste as per the list of wastes , at the site and mechanically size reduce them for the purposes of recovery elsewhere, mainly as tyre derived fuel – meeting the relevant specification .

Treatment is limited to shredding/size reduction with the resultant outputs, stored in external storage bays – prior to being removed bulk transport to onwards processors – for use as an alternative waste derived fuel . A small baler is retained on site for the occasional management of tyres and for the baling of some tyre wire – in preparation for transport .

Previous proposals for the facility , included the on-site pyrolysis of shredded/granulated tyres under a ‘SWIP’ Small Waste Incineration Process (SWIP)’ as defined in Schedule 13A (Regulation 35(2)(g)) under the Environmental Permitting (England & Wales) Regulations 2010.

No Pyrolysis/Incineration will take place at the facility initially – although the SWIP will be maintained should the technology become viable in the future .

The facility previously operated a two stage system – shredding followed by granulation , to produce a finer granulate for use in separate recovery activities ( surfacing , landscaping etc.). This required pre-shredding with a large mobile shredder and secondary processing by static granulating equipment .

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No granulation will take place at the facility initially , although the activity will be retained in the permit – for future development at the site .

The activities carried out at the site as defined under Annex II of the Waste Framework Directive can be summarised as follows:

R3: Recycling or reclamation of organic substances which are not used as solvents;

Mechanical reprocessing of tyres and associated arisings from other facilities


R4: Recycling/reclamation of metals and metal compounds

R5: Mechanical reprocessing of industrial wastes

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).

Up to 650 tonnes will stored on site any one time in constructed concrete bays.

The rationale for bays sizes – taking into account Fire Prevention guidance is shown in Appendix 30 of the main application.

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## ENVIRONMENTAL RISK ASSESSMENT

An assessment of the overall environmental risk for the facility is considered in this application.


The potential impacts on /from the following are discussed:

- Watercourses / Groundwater
- Local nature sites/ SAC/SPA/RAMSAR etc.
- Flooding
- NVZ
- Local Receptors
- Basic air quality
- Dust , Noise , Traffic - local amenity
- Aquifers
- Pests
- Odours

The outline basis for the assessment defining the approach , is the standard Rules permit (SR2021 No 13: storage and mechanical treatment of end-of-life tyres for recovery) generic risk assessment . This is considered relevant as on the whole the Sotheby Rd facility meets all the criteria for location and situation – namely:

The site must be a minimum distance from certain types of sensitive areas and sites. It cannot be within:

- 200 metres of a European site, Ramsar, Site of Special Scientific Interest or Marine Conservation Zone
- 50 metres of a National Nature Reserve, Local Nature Reserve, Local Wildlife Site, Ancient woodland or Scheduled Monument
- 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

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- 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

#### AMENITY AND ACCIDENT RISK

An assessment of the potential impact on the local area , business’s and sensitive receptors is considered in the application.

In general – tyre recycling is a relatively low risk activity – with the activity being very limited in waste types , and very limited in general activities - limited to those largely undertaken under exemption ( baling , shredding , size reduction ,granulation and storage ) .


Following the pre- application considerations , a dust management plan and fire prevention plan are included - which address the most likely areas of concern under the risk assessment undertaken .

#### EMISSIONS TO AIR /LAND/GROUNDWATER / SURFACE WATER AND WATERCOURSES

There are no point source emissions to consider in this application .

#### HABITATS ASSESSMENT


The site lies almost exactly 1km from any relevant site – in an industrial area . Following the pre application discussion , the basic considerations are included for local habitats and the potential for impact assessed , however an any further in depth survey and assessment is not considered necessary due to the limited equipment and lack impact from operations observed so far . The actual distance from the SSSI edge has been measured on plans at >1km but considered in any case ( Appendix 2 )

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## ENERGY EFFICIENCY AND RESOURCE USE

The site management system will include a basic requirement to monitor energy and resource usage – and target improvement where feasible.

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KEY CONTROL MEASURES /STATEMENTS

- The activity of tyre /rubber shredding does not require any hazardous substances or involve any hazardous wastes
- The activities of tyre recycling are well established and the risks understood
- The equipment for tyre recycling is basic and consistent with low risk and exempt activities
- The generic risk assessments for tyre recycling ( standard rules ) rate most risks as low /very low
- A dust and fire management plan will be in place and maintained
- All activities take place on concrete with access to site drainage
- The site drainage is adequate and can be sealed by mechanical means
- The site operators have management experience from other facilities in the group
- The site has experienced WAMITAB holders familiar with site controls
- The site lies in an industrial estate with other waste companies and historical industrial uses – and lies remote from most sensitive receptors
- Site management have already demonstrated a compliant approach to the EA
- The operators have a desire to invest in staff and develop the facility
- The operation is a genuine recycling /recovery activity with opportunities to solve future problems for waste banned from landfill .

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