

NON-TECHNICAL SUMMARY

Amberley Way, Hounslow, TW4 6BH

Rubber Recycling Solutions Limited

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1 Introduction

- 1.1 This Non-Technical Summary accompanies the above application to operate the site at Amberley Way, Hounslow, TW4 6BH as a physical treatment facility for non-hazardous waste. The site proposes to accept, store and bale End-of-life tyres (ELTs) for recovery:
- 1.2 The site is located at Amberley Way, Hounslow, TW4 6BH, which is situated in an industrial/business area. Immediately surrounding the site are several industrial/commercial premises; the nearest residential receptors are situated 250m to the east of the site on Beavers Close which are beyond various large industrial units.

2 Application proposals

- 2.1 Rubber Recycling Solutions Limited will hold and operate an Environmental Permit (EP) for the acceptance, storage and treatment of End-of-Life Tyres (ELTs) for recovery.
- 2.2 The throughput of the site will be limited to <25,000 tonnes per annum.
- 2.3 The Environmental Permit is required for the storage (keeping) prior to removal, and treatment of waste. The proposed waste storage and treatment processes to be carried out on site will include those shown in the table including waste recovery operations:

Table 2.1 – Permitted Operations

Description of activities	Limits of activities
R3: Recycling/reclamation of organic substances which are not used as solvents R4: Recycling/reclamation of 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)	Tyre Recycling - Treatment consisting of sorting, cutting, separating, baling, compacting for recovery. Waste types as specified in the EP. Wastes shall be stored for no longer than 3 years prior to recovery. All treatment of waste shall be carried out inside a building. All storage and treatment of waste must take place on an impermeable surface with sealed drainage.

- 2.3.1 The site will be open during the following hours for the delivery, receipt and processing of waste:

Monday to Friday	06:00 – 18:00
Saturday	06:00 – 13:00
Sundays, Bank/Public holidays	Closed

3 Proposed EWC codes

3.1 The following tables below demonstrates the proposed EWC codes to be accepted as part of the application.

Table 3.1 – Proposed EWC Codes for Physical Treatment Facility

Physical Treatment Facility	
Maximum Quantities	The total quantity of waste accepted shall be less than 25,000 tonnes a year.
Exclusions	Wastes having any of the following characteristics shall not be accepted: Consisting solely or mainly of dusts, powders or loose fibres
Waste Code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport (including off-road machinery)
16 01 03	end-of-life tyres
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION/INDUSTRIAL USE
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising)
19 12 04	plastic & rubber

4 Documentation and fees

4.1 Application fee

4.1.1 Oaktree Environmental Ltd have sought guidance from the Environment Agency charging scheme.

Table 4.1 – Base Application Fee Table

EPR Charging Scheme Ref	EPR Charging Scheme Ref & Description	Type of application (Ref)	Fee
1.16.12	Main Application Fee	Bespoke	£7,930
		TOTAL	£7,930

4.2 Documentation and additional charges

4.2.1 In addition to the above, as the site is accepting and storing combustible waste, the operator will be submitting a Fire Prevention Plan (FPP) and the following table sets out the additional charges.

Table 4.2 – Additional Application Fees Table - Charges for plans and assessments

General	Consideration	Document & Ref	Fee
Environmental Management System	Required due to permitted activities	AMB-2972-A	N/A
Fire Prevention Plan (Table Ref 1.19.3)	Required due to permitted activities	AMB-2972-B	£1,241
Non-Technical Summary	N/A	AMB-2972-C	N/A
Environmental Risk Assessment	Required due to permitted activities	AMB-2972-D	N/A
Site Condition Report	N/A	AMB-2972-E	N/A
		TOTAL	£1,241

4.2.2 In addition to the above table, the following forms have been submitted as part of this application:

- Application forms Parts A, B2, B4 & F1

4.2.3 Based on the above, the total fee payable to the Environment Agency on submission will be **£9,171**

4.2.4 The table below summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6:

Table 4.3 – Application Form Reference Table

Application Form	Question Ref	Page No.	Document Ref
Part A	Q5	2	2972_Director's_Info
Part B2	3B	5	AMB-2972-G
Part B2	3D	6 & 7	AMB-2972-A
Part B2	5A	7	AMB/2972/01, AMB/2972/02, AMB/2972/03 – also found in Appendices of main documentation
Part B2	5B	7	AMB-2972-E
Part B2	5C	8	AMB-2972-C
Part B2	5D	8	AMB-2972-B
Part B2	6	8	AMB-2972-D
Part F1	1 Table 1, 2 & 3	1	AMB-2972-C

4.3 Justification for no further assessments

NOISE

4.3.1 Noise has been screened out as part of the Environmental Risk assessment and it is considered an NIA and NVMP is not required due to the following:

- The proposed mechanical treatment for this site consists of baling only waste which will be light and will also be undertaken inside an existing building. The only external activities which will take place will be manoeuvring, loading and unloading of waste into containers for removal off site. As the site is situated on a busy

Industrial Estate and there are large industrial premises situated between the site and nearest residential receptors, it is considered that the site will not generate excessive levels of noise.

- The surrounding activities will have constant vehicle movements throughout the day which would offset any noise generated by the operator's proposed operations.
- The treatment operations are carried out internally and the building has 0.4m concrete block walls and insulated cladding. The building will screen noise and reduce noise levels at the nearest receptors.

4.3.2 Based on the aforementioned mitigation measures, it has been deemed that no noise impact assessment is necessary to accompany the application.

ODOUR

4.3.3 In terms of odour, the site will not accept any odorous wastes and if any odorous waste is identified, they will be removed, rejected and stored in a sealed quarantine skip.

DUST

4.3.4 In terms of dust, all treatment of waste will be treated by baling only which will not create a dust issue at the site.

PESTS

4.3.5 The site will not accept wastes which give rise to pests or vermin.

HABITATS

4.3.6 The site is not located within 1,000m of a special protected site.

4.4 **Summary**

- 4.4.1 The site is currently complaint with a T8 exemption and the only reason for transitioning to a permitted site is due to the potential treatment and storage increasing beyond the limits of the exemption and also with regards to the potential withdrawal of the T8.