



Management System Summary



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SITE DETAILS

Murfitts Industries Ltd,
48 Hardwick Grange,
Warrington,
WA1 4RF

OPERATOR DETAILS

Murfitts Industries Limited,
Avenue One,
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APPLICATION REFERENCE

TBC

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K18.14~20~002	Sensitive Receptors 1 km	-	21/07/2023
K18.14~20~003	Site Setting Plan 2km	-	21/07/2023
K18.14~20~004	Site Layout Plan	-	21/07/2023
K18.14~20~007	Site Layout and Drainage Plan	-	21/07/2023

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1 INTRODUCTION

This document is the Management System Summary (MSS), as required by environmental permit application form Part B2 Section 3d Management Systems, and the associated Environment Agency guidance¹. The MSS accompanies the application for a Bespoke Environmental Permit application.

The application has been prepared by Wisser Environment Limited on behalf of the applicant Murfitts Industries Limited (MIL).

The Murfitts Industries Limited site is located at 48 Hardwick Grange, Warrington WA1 4RF, National Grid Reference SJ 65032 90046, and is shown on the Permit Boundary Plan (K18.14~20~001). The proposed site is positioned in the Hardwick Grange Industrial Area in Woolston, a suburb of Warrington approximately 30 km West of Manchester.

The M6 is located approximately 250 m East-North-East of the site, running SE to NW it provides easy access to the site via A57 and the B5210 Woolston Grange Avenue.

The scope of this application is limited to the storage and mechanical treatment (tyre shredding) of End-of-Life tyres, and the subsequent dispatch of EoL tyre chips for recovery.

Murfitts Industries Ltd (MIL) are part of the European Tyre Enterprise (ETEL) Group who are international tyre and automotive service, maintenance and repair business group that operate multiple retail brands include Kwik-Fit and Stapleton's Tyre Service (STS). The site is co-located with an STS tyre warehouse, from which new tyres are dispatched to retail centres, and end of life (EoL) tyres returned for processing.

Waste is delivered to site via vehicles operated by MIL; on a take back basis on vehicles operated by Stapleton's Tyre Services following delivery of new tyres to retail hubs; trusted third parties, or other vehicles contracted through the ETEL Group.

This site is to operate in a near identical fashion to Murfitts Industries Limited Peterborough site, Tyre Recycling Facility, Club Way, Cygnet Park, Hampton, Peterborough, PE7 8JA (EPR/DB3803TY) which is also positioned next to an STS tyre facility. This strategic operation

¹ [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

allows for a close-loop system for the tyre industry, offering the service of shredding the EoL tyres collected by Stapleton's to use as another product in a new industry.

The processes that will be carried out at site are the following:

- The end of life (EoL) tyres are delivered to the site and are unloaded by hand directly on to the conveyor belt that leads to the shredder, or into a fire resistant bay;
- a low-speed shredder reduces the size of the rubber to 50 mm chips, in accordance with PAS107;
- the shredded EoL tyres are either directly discharged into a waiting trailer, or temporarily stored in a designated bay, for onward dispatch to another permitted site for recovery.

The site can process up to 150 tonnes of EoL tyres per day, and up to 850 tonnes per week.

All deliveries to the site are planned:

- Under normal operating conditions all EoL tyres received will be processed directly into the waiting trailer and dispatched by the end of the working day.
- Under abnormal conditions, e.g., plant breakdown or organised shutdown, deliveries will be diverted to the Murfitts Industries Limited national network of permitted facilities.

The EoL tyres received at the site are contained either within the delivery vehicle, in the pre-processed bay, or held within the processing equipment. The facility is co-located with a strategic Stapleton's tyre distribution centre and provides a closed loop, taking back EoL tyres received on vehicles that have delivered new tyres, from the distribution centre to retail centres across the region.

The facility complements the wider site, and will be designed to process tyres by shredding, with equipment purchased from specialist suppliers.

Table 1: Table of definitions

Terms	Definition
End of Life (EoL) tyre	Tyre which has been permanently discarded following normal use.
Chips	Fragmented pieces of used tyres, including embedded wire or textile material, whose maximum dimension, of the rubber portion is between approximately 10 mm and 50 mm in size.
Shred	Fragmented pieces of used tyres, including embedded wire or textile material, whose maximum dimension, the rubber portion, is between 50 mm to 300 mm in size.
Whole Tyre	Complete tyre comprising mainly casing, including cord and wire bead, sidewall and tread.
Ambient Size Reduction	Processing of used tyres into smaller particles by mechanical means at or above ambient or room temperature. Also termed shredding

2 SCOPE OF MANAGEMENT SYSTEM

The scope of this Management System Summary (MSS) extends to all operations associated with the acceptance, handling, treatment and storage of waste at 48 Hardwick Grange and detail the principles, infrastructure, operational activities, methods and environmental controls for the site.

This MSS is designed in conjunction with the Murfitts Industries Limited Business Management System which has ISO 9001 and ISO 14001 accreditation. The other Murfitts Industries Limited operational sites, such as Lakenheath (CP3396NQ), follow this same Business Management System successfully.

The MSS defines operational and maintenance procedures and details requirements in the event of an accident or incident. Murfitts Industries Limited's business management system is certified to ISO14001 Environmental Management and 9001 Quality Management (Appendix A), the intention is that this will be extended to the Warrington site subject to other business demands.

The waste permitted to be accepted at the facility are detailed within the List of Waste (K18.14~09~005) Table 1 and section 3 below.

The activities shall be managed and operated:

- a) in accordance with a Management System, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and closure and those drawn to the attention of the operator as a result of complaints; and
- b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

The site is operated in accordance with management procedures and controls outlined within this MSS which has been produced in accordance with the Environment Agency (EA) guidance, '*Develop a Management System: environmental permits*².

² [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits), updated 3 April 2023

The benefits of operating an effective and efficient Management System are to ensure sustainable business practices, reduce risks and losses, reduce operational costs, to help obtain business and a good reputation, and to ensure legal compliance.

A controlled copy of the MSS will be available at 48 Hardwick Grange.

Murfitts Industries Ltd will ensure that copies of all relevant permits and approved supporting documents are provided to all personnel with nominated responsibility for the management or control of the site.

The site operational procedures are under constant review and, where any changes directly impact controls set in the MSS, this will be amended and a controlled copy of the relevant section of the MSS.

The locations of the documents will be made known to all relevant personnel and will always be readily available for inspection by regulatory bodies when the site is operational.

3 WASTE TYPE

Table 2 Permitted Waste Types.

EWC 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) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres

4 PERMITTED ACTIVITIES

The site operates as a waste facility in accordance with the Environmental Permitting (England and Wales) regulations (As amended) (2016).

The processes at the site are listed in Table 4 (below) with reference to Annex IIB of The Waste Framework Directive.

Table 3: Permitted activities

Description of activities		Limits of activities
R3	Recycling or reclamation of organic substances which are not used as solvents, including composting and other biological transformation processes.	<p>Storage prior to and post treatment.</p> <p>Treatment consisting only of manual sorting, separation, shredding, cutting, baling, crushing or compaction</p>
R4	Recycling or reclamation of metals and metal compounds	
R13	Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	

The permitted activities will occur at the North-West corner of the site as shown in the Site Layout Plan and the Site Layout and Drainage Plan (K18.14~20~004 & K18.14~20~007). The method of operation is given in broader detail in Section 9 below.

This MSS details all operational procedures whether covered under the jurisdiction of the Environment Agency or not.

5 WASTE QUANTITIES

The waste activity has a capacity of 35,000 tonnes per annum.

There is minimal storage of waste at this site, none exceeding 5 days. EoL tyres arriving on site will be processed and removed within normal working hours as shown above.

The site can process up to 150 tonnes of EoL tyres per day, and up to 850 tonnes per week.

The following assumptions used to calculate these storage quantities are for guidance only; the actual tonnage remains the measured limit.

Table 4: Approximate weigh/volume of materials

Material/Quantity	Weight	Volume
20 Truck Tyres	1000kg	5m ³
125 Car Tyres	1000kg	6m ³
Chips	1000kg	2m ³

The shredder can operate at a maximum throughput of 10 tonnes per hour.

All deliveries to the site are pre-booked:

- Under normal operating conditions all EoL tyres received will be processed directly into the waiting trailer and dispatched by the end of the working day.
- Under abnormal conditions, e.g. plant breakdown or organised shutdown, deliveries will be diverted to the Murfitts Industries Limited national network of permitted facilities.

The EoL tyres received at the site are contained either within the delivery vehicle, in the pre-processed bay, or held within the processing equipment. The facility is co-located with a strategic Stapleton's tyre distribution centre and provides a closed loop, taking back EoL tyres received on vehicles that have delivered new tyres, from the distribution centre, to retail centres across the region.

The facility complements the wider site, and will be designed to process tyres by shredding, with equipment purchased from specialist suppliers.

In case of breakdown EoL tyres will be diverted to Murfitts Industries Limited national network of waste sites.

If unable to bring machinery back online on the same working day, any tyres part way through the process will be removed and stored as a part of the 200 m³ storage bay.

6 SITE ENGINEERING

The Environmental Risk Assessment (K18.14~20~004) indicates that routine waste management operations do not present a significant risk of contamination to surface water or ground water.

6.1 Site Surfaces

The areas of the site described below are shown on the Site Layout and Drainage Plan K18.14~20~007.

All site surfaces are impermeable. Surfaces will be drained in accordance with Section 6.2 of this MSS.

6.2 Drainage

All shredding activities will take place on an impermeable surface. The processing area is partially covered by a roof, the shredder has an isolated sump that provides a sealed drainage system, and the ability to recirculate water back into the process. Daily housekeeping will prevent any build-up of material on the surface.

The wider site is served by an enclosed drainage system, both draining via their own interceptors, which can be sealed in the event of an emergency.

In case of an emergency involving either spillage or fire water, clay drain mats will be deployed to seal the drains, along with containment booms where appropriate.

As a result of accident or incident, on the permitted area, further inspections will be made, and the drainage system cleaned as necessary. Any accident or incident which had the potential for significant environmental impact will be recorded and reported to the EA.

6.3 Construction Procedures and Supervisions

Any construction work, infrastructure improvement and replacement will be undertaken by a specialist contractor. A suitably qualified Civil Engineer will inspect works to ensure that all necessary standards and specifications are met.

6.4 Maintenance and Inspection

Daily inspections of site infrastructure will be undertaken by the Technically Competent Manager (TCM) or a person appointed by the TCM, in accordance with Section 9.9 Summary of Maintenance and Inspection Required. All defects will be reported and recorded.

7 SITE INFRASTRUCTURE

The site lies in an industrial area of Woolston, a suburb of Warrington approximately 30 km West of Manchester.

The layout of the site is shown on Site Layout Plan (K18.14~20~004).

The drainage of the site is shown on the Site Layout and Drainage Plan (K18.14~20~007).

Site infrastructure comprises of the following:

- Entrance gate.
- Weighbridge and waste acceptance area.
- Two holding bays (temporary holding area for whole tyres/chips).
- Steel frame sheds underlain by impermeable surface.
- CCTV cameras, spill kits, fire extinguishers and first aid kits; and
- Office and welfare.

7.1 Site Security

The site is at Murfitts Industries Ltd, 48 Hardwick Grange, Warrington, WA1 4RF and is located within an established industrial area which borders the site to the North, East, South and West.

The permitted area of the site is approx. 0.33 ha, it forms part of a wider industrial site operated by Stapleton's Tyre Services. In summary, the security measures present are as follows:

- Perimeter Fencing
- Alarm system (via CCTV)
- 24/7 Industrial Site Security
- Gated access controlled through gatehouse

Vehicular access and egress is via the entrance on Hardwick Grange.

Shredding is to be undertaken 24 hours a day 6 day a week. The site will be staffed during these periods and remotely monitored by a CCTV monitoring company 24 hour a day, 7 day a week, 365 days a year. Wider Stapleton's site is manned 24/7/365.

Integrity of security measures immediately around the operational area will be subject to a daily visual inspection with a more formal inspection once a week in accordance with Section 9.9 Waste Unloading and Inspection. Any defects will be recorded in the site diary and remedied in the appropriate manner.

The site is enclosed within a perimeter fence, situated in a large industrial area and benefits from 24/7 CCTV coverage with gated access.

The layout of the site is shown on Site Layout Plan (K18.11~20~004). The drainage of the site is shown on drawing Site Layout and Drainage Plan (K18.14~20~007).

7.2 Access

The site lies in an industrial area of Woolston, a suburb of Warrington approximately 30 km West of Manchester.

The M6 is located approximately 250 m East-North-East of the site, running SE to NW it provides easy access to the site via A57 and the B5210 Woolston Grange Avenue.

It is located within the Grange Industrial Estate, with the closest residential site approximately 400 m West South-West of the site. The site is co-located within Stapleton's Tyre Services storage and distribution facility.

7.3 Site Information

Emergency contact numbers, head office address and telephone numbers, hours of operation, a copy of the Environmental Permit Number and the Environment Agency's general enquiries and emergency contact telephone numbers will be displayed in the operational area.

7.4 Site office and Welfare

A site office is provided with electricity, telephone/internet, fire extinguishers and first aid equipment. A copy of the site's Environmental Permit and this MSS will be available within the office.

A visitor's book, site diary and accident book will be in the Site Office. The site diary, or other electronic record, will be used to record any significant event, visits by Environment Agency personnel, dates for proposed engineering works and any other important information.

Shared welfare facilities for the operational staff are available within the wider site area.

7.5 Fuel and Oil Storage

Hydraulic and lubricating oils, for use within mobile plant and machinery, will be stored in appropriate containers or removed by the service engineer. The container is provided with a spillage containment tray, to prevent the leakage from the container of any materials that might leak from any of the containers stored within it, in accordance with Oil Storage Regulations for businesses.³

Any containers stored within the site will be located away from operational and storage areas, and clearly marked with their contents and capacity. Container openings will be securely sealed before being moved around site to prevent spillages.

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

7.6 Site Services

The site will be provided with mains water, electricity, and telecoms services.

7.7 Weighbridge

Throughout of tyres will be measured via the weighbridge or through tyre counts, converting to a tonnage using the weight to volume information provided in Table 4.

³ <https://www.gov.uk/guidance/storing-oil-at-a-home-or-business>

8 STAFF & EQUIPMENT

Main operational instructions of site management and operatives is given in the site MSS, and specific written instruction issued separately and to be attached to the site copy of the MSS.

Updates in training will be as necessary or when the environmental permit or site EMS brings a change to the duties of personnel

8.1 Site Staffing

8.1.1 Management

Operations will be overseen by a Technically Competent Manager (TCM) qualified through schemes approved under the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

Details of TCM(s) will be provided to the Environment Agency. At times where the specified TCM(s) is/are unavailable, an alternative TCM will be allocated responsibly for operations, the Environment Agency will be made aware of these changes.

Responsibilities include ensuring compliance with the Permit, ensuring compliance with the Health and Safety Policy, and liaison with the Environment Agency and other regulatory bodies. The TCM will attend site in accordance with the attendance criteria specified within the Environment Agency guidance, 'Legal operator and competence requirements: environmental permits⁴ .

8.1.2 Operations Staff

A minimum of one person will be on site at all times during operational hours. Site operatives will be responsible for controlling incoming and outgoing vehicles, inspecting waste to ensure compliance with permit conditions and Duty of Care notes, controlling vehicle movements, using site equipment and machinery, loading and unloading vehicles, ensuring good general housekeeping for the site, and reporting any issues to the TCM. Additional persons will be brought to the site when and if necessary.

⁴ [Legal operator and competence requirements: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits), updated 11 June 2019

8.1.3 Staff Training

All site staff will be given relevant training and supervision on the machines and equipment used at the site. They will also be given instruction on the relevant parts of the Environmental Permit and management system to effectively and efficiently carry out their job. Training will be documented, and records kept.

It is the responsibility of Senior Management and the Technically Competent Manager to ensure that no unauthorised persons operate equipment on site.

Operation of the equipment is carried out exclusively by staff that are fully trained in safe working practices and the safety features of the equipment.

Individual operators have access to the operation and maintenance manuals of the equipment they use.

8.2 Operational Hours

Waste Acceptance

The site will be open to accept end of life tyres during the following times:

Monday to Sunday	00:00 to 23:59
Bank Holidays	00:00 to 23:59
Other Public Holidays	00:00 to 23:59

NB the wider Stapleton's Tyre Service site operates 24/7

Waste Processing

Site operational hours for the processing of tyres will be as follows:

Monday to Saturday	00:00 to 23:59
Sunday	N/A
Bank Holidays	00:00 to 23:59

Initially EoL tyres will be processed between the following hours:

Monday to Friday	07:00 to 18:00
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Saturday 07:00 to 13:00

Sunday & Bank Holidays N/A

8.3 Plant and Equipment

The site is equipped with specialised tyre processing machinery: a slow speed shredder and conveyors. The machinery has been specified to; maximum payloads for tyre dispatch vehicles; ease of handling; reliability; safety of operatives and site users; to minimise environmental impact; and for the capability and fitness for purpose of handling large quantities of tyres.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

All lifting equipment is periodically inspected and tested by an external auditor on an annual basis in accordance with manufacturers' guidance and manuals to ensure the plant and equipment is available for work when required. Weighing equipment is also inspected and tested on annual basis by an external auditor in accordance with the Weight and Measures Act 1985.

The site is operated in accordance with written procedures incorporated within both the Murfitts Industries Limited Business Management System (Appendix A) and this MSS.

Preventative maintenance of the process machinery, including greasing and blade changes will be carried out weekly to ensure that the process runs efficiently.

Daily checks will include visual inspection of elements of the process e.g., conveyors. Equipment will be maintained in line with the manufacturers' guidelines.

9 SITE OPERATIONS

9.1 Health and Safety Instruction

All visitors to the site will report to the site manager. First time visitors to the site will be required to read the displayed notice giving instruction on health and safety and site procedures.

9.2 Duty of Care

All incoming EoL tyre loads will be supported by appropriated documentation detailing the source location and description of the waste for Duty of Care purposes. A copy of this description will be kept at the site office.

9.3 Carrier Registration

Only registered waste carriers will be contracted to remove waste from site. The site manager will ensure that hauliers removing waste from the site are Registered Waste Carriers using standard checks. Where there is uncertainty regarding registration, a carrier will be asked to provide a validated Waste Carriers Certificate.

9.4 Waste Description

All loads will be described appropriately and will only be accepted where in compliance with acceptable waste types for the site (Section 3). The site manager will ensure that delivered waste is acceptable and permitted by the Environmental Permit.

Murfitts Industries Ltd (MIL) are part of the European Tyre Enterprise (E TEL) Group who are international tyre and automotive service, maintenance and repair business group that operate multiple retail brands include Kwik-Fit and Stapleton's Tyre Service (STS). The site is co-located with an STS tyre warehouse, from which new tyres are dispatched to retail centres, and end of life (EoL) tyres returned for processing.

Murfitts Industries Limited accepts solely non-hazardous waste (EoL tyres) at 48 Hardwick Grange Site from within the UK.

9.5 Pre-Acceptance Procedure

A pre-acceptance procedure is followed in accordance with Sector Guidance Note (SGN) S5.06 *recovery and disposal of hazardous and non-hazardous waste*, section 2.1.1⁵.

The types of wastes to be accepted at the site are detailed in the List of Waste (K18.14~09~005), accompanying the application and is also stated in Section 3 of this document.

Murfitts Industries Ltd operate a number of EoL tyre recycling facilities across the country processing shredded tyre chips for use in sports pitches, tarmac and other uses. The activity on site represents a low-risk activity owing to the scale of the operation, limited storage on site, and that all processes are conducted within a building.

Tyres will be delivered to site through the site entrance. All loads will undergo the waste acceptance procedure prior to unloading. It is unlikely that any non-conforming loads will be present given that all loads are pre-booked, single stream, and from known locations. The supply chain is long established, and secure.

Shredders will be loaded either directly from the delivery vehicles onto the conveyor for shredding or into a temporary storage bay for a staggered loading process. The first bay will be used to temporarily store EoL tyres waiting to be shredded, with the second bay temporarily holding shredded EoL tyre chips for no longer than 72 hrs.

Shredders will be slow speed to limit any risk of combustion whilst a recirculating water system will also be installed to dampen the material and further reduce combustion risk and manage the minimal dust emissions within the process.

The tyres will be shredded into <50 mm chips. The chips that do not meet this measurement are separated from the final product and fed through the shredder again until the appropriate chip size has been reached in accordance with PAS107.

Waste is delivered to site in containerised lorries, to the waste reception area as shown in the Site Layout Plan (K18.14~20~004).

⁵ [Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374242/sgn_s5_06_recovery_and_disposal_of_hazardous_and_non_hazardous_waste.pdf), updated 10 October 2018

9.6 Waste Dispatch

Any chips leaving the site in accordance with PAS107 standard, will be accompanied by a written description, and due diligence checks will ensure that they are transferred to a suitably permitted waste management facility, by a registered waste carrier.

9.7 Process Controls

- Site personnel are to always wear the correct PPE provided by the Company. Report any wear and tear so that it might be replaced.
- Drive around the site in accordance with site driving rules.
- Only trained operators may operate machinery on-site in accordance with operational procedures.
- Beware of your own area and others who may enter it.
- Ensure two-way radio communication with others is operational.
- Engage positively with these rules and if unsure contact your Line Manager.

9.8 Waste Receipt

Tyres will arrive by vehicle to be manually unloaded by staff straight into a fire-resistant bay and/or directly onto the conveyor belt leading to the processing plant.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

These records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

9.9 Waste Unloading and Inspection

On arrival, vehicle details will be recorded in the site diary or similar electronic record. Waste will only be accepted from companies who have provided a valid waste carrier registration and relevant Waste Transfer Note.

All loads will be pre-booked, no ad-hoc deliveries will be accepted. All loads are inspected for non-permitted wastes, quality, and conformance with Environmental Permit requirements. Non-conforming loads are refused entry and details are recorded.

All drivers must be wearing appropriate Personal Protective Equipment (PPE) before beginning the unloading process.

Waste deliveries will be inspected upon arrival to ensure no 'non-compliant' waste is present, and then directed to the waste reception area before loads are discharged in the designated area.

The site is operated in accordance with written procedures incorporated within the Murfitts Industries Limited Management System.

All procedures include written instruction on how to undertake tasks, equipment involved, PPE/safety equipment required and potential hazards. Each procedure is accompanied by an activity risk assessment.

Any spillages will be cleared in accordance with Section 9.11 Spillages below

9.10 Unacceptable Waste

Given the limited nature of site operations, and that EoL tyres are source-segregated (being collected directly from tyre retail centres), it is highly unlikely that unacceptable waste types will be delivered to site.

In the unlikely event that such waste does arrive, any non-conforming waste types, other than those listed in the List of Waste (K18.14~09~005), will be rejected upon visual identification.

Rejected wastes which cannot be immediately removed will be quarantined and the customer will be informed (usually via telephone/email) and arrangements will be made to remove these items from site within 5 days.

All necessary measures to ensure appropriate containment and removal from site will be observed and all agencies informed as appropriate.

9.11 Spillages

Spill kits are strategically placed within the site. Spill response kits shall be available during the transfer of all substances at the site.

10 WASTE STORAGE & HANDLING

10.1 Storage Areas

Under normal site operations storage of tyres will take place for no longer than 5 days in either bay. If the shredder is off line, casings will be loaded into a waiting trailer and dispatched to Murfitts Industries Limited's other permitted sites for processing.

Storage locations are identified on K18.14~20~004 Site Layout Plan

Table 5 Storage locations

MATERIAL	LOCATION	HOW IT IS STORED	VOLUME (M ³)	MAX. TIME IT WILL BE STORED
EoL Whole Tyres	Input bay	Whole, loose, in concrete block bay	Max Storage 200 m ³	5 days
Tyre Chips	Output bay	Whole, loose, in concrete block bay	Max Storage 200 m ³	5 days

This small-scale storage is in a resistant concrete bay and utilised to maintain the flow of tyres through the shredding process if the 'just in time' supply chain stops.

Tyres are stored no longer than 5 days in either bay. Further storage infrastructure and fire prevention is included in the Fire Prevention Plan (K18.14~09~006) and supported in the Site Layout and Drainage Plan (K18.14~20~007).

A record is kept of all waste received at, or rejected from, the site. These records contain:

- Date of arrival;
- Producers' details;
- Previous holders;
- A unique reference number;
- Intended treatment/recovery route;

- Accurate nature and quantity of waste, including hazards; and
- Storage location.

All records are maintained for a minimum of 3 years following recovery or disposal

10.2 Tyre Handling

Tyres for shredding will be loaded either by hand or mobile plant, from the input bay to the processing machinery where they will be placed by hand directly onto the conveyors that feed the shredder.

11 WASTE RECOVERY & TRANSFER OPERATIONS

11.1 Shredding Tyres

As shown in Figure 1 below, EoL tyres will be loaded directly to a fire-resistant storage bay to carry out staggered loading onto the conveyor which, in turn, feeds a slow speed shredder, which shreds the tyre.

The shredder has a maximum operational capacity of 10 tonnes per hour (Approx. 150 tonnes per day, 850 tonnes per week – depending on feedstock, and operational requirements).

The shredded product (chips) is then conveyed either directly into the trailer of a waiting lorry for onward dispatch by the end of the working day, or temporarily into the output bay for subsequent dispatch.

The chips product conforms to PAS 107:2007 Specification for the manufacture and storage of size reduced tyre materials and is considered suitable for potential end use applications such as; landfill drainage layer, culvert drainage beds, noise barriers and energy recovery (Annex E of PAS 107:2007).

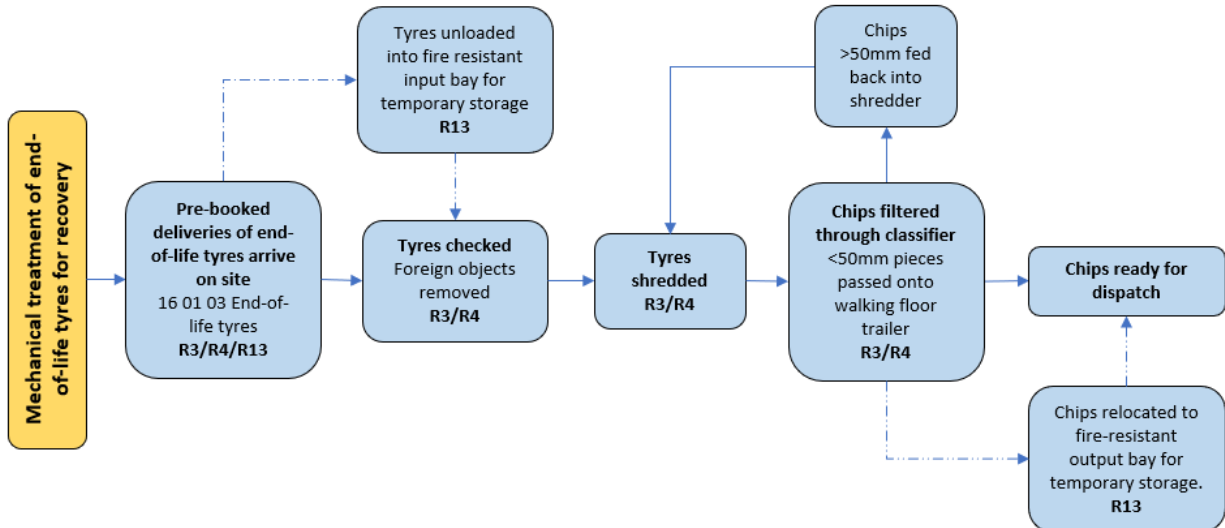


Figure 1 Process flowchart

All site treatment processes are undertaken in accordance with relevant elements of Sector Guidance Note (SGN) S5.06 *recovery and disposal of hazardous and non-hazardous waste*.

- Waste duty of care information will be inspected and recorded;
- Loads will be directed to the waste acceptance area (site surface and infrastructure) and will either be sent straight to the plant conveyor belt to be shredded or deposited in the first fire-resistant bay;
- The EoL whole tyres will be stored in the fire-resistant input bay, (Approximately: 16 m (long) x 9 m (wide) x 3.2 m (high)).
- Once the whole EoL tyres have been shredded, the chips are then deposited onto outgoing lorries ready for dispatch or relocated to the fire-resistant output bay. (Approximately: 12 m (long) x 8 m (wide) x 3.2 m (high)).
- Waste storage maximum duration of 5 days.
- Site staff will carry out regular waste storage location inspections.
- Waste will be treated using the First In, First Out (FIFO) principle; and dispatched using the same principle.

11.2 Transfer Operations

Alternatively, after the tyres have been shred, the chips can be off-loaded from the conveyor and transported to a fire-resistant output storage bay, for a maximum storage time of 5 days, prior to dispatch.

The fire-resistant storage bays can be used to hold whole or shredded tyres during plant shut down (Site Layout Plan K18.14~20~004 and Site Layout and Drainage Plan K18.14~20~007).

Where shredding operations cease as the result of an incident, equipment failure or a planned shutdown, the bays may be utilised as an intermediate transfer hub prior to onward movement to other site.

12 ACCIDENT & INCIDENT MANAGEMENT

The Murfitts Industries Limited Environmental Risk Assessment (K18.14~09~004) for the Warrington Site (Appendix A) identifies foreseeable risks on site and provides details on how risks will be controlled.

Potential accidents and incidents have also been identified within Table ERA13 of the Environmental Risk Assessment (ERA) (K18.14~09~004), where management procedures and controls are identified to reduce any identified risk.

Any accident or incident that has caused, is causing, or may cause significant pollution will be recorded, and the Environment Agency notified as soon as practicable.

These will be investigated by a senior manager and where action is identified as being required, this will be recorded; responsibility will be allocated; preventative or corrective actions specified, and completion required within a defined timeframe.

Control measures detailed within the ERA include:

- Site is secured by fencing and gated and CCTV is monitored externally 24/7;
- Regular monitoring of weather warnings/flood alerts/EA warnings.
- All vehicles delivering waste will abide by on-site speed limits and road markings.
- Waste deliveries and site operations shall be overseen by the Technically Competent Manager or nominated competent person;
- Unloading of waste will only be undertaken in designated areas;
- Treatment activities will be undertaken on an impermeable surface with sealed drainage;
- Appropriate training regarding process/plant operation and emergency procedures is provided to all relevant staff;
- Plant and equipment will be maintained in accordance with their maintenance schedules or when applicable;
- Fuelling of plant is to be undertaken on an impermeable surface with a suitable spill kit and fire extinguisher available.
- Stockpiled materials are non-combustible
- The site will be managed in accordance with the minimum operating standards detailed in the Fire Prevention Plan (K18.11~09~006).

Accident prevention and management will be reviewed on an annual basis along with the Management System or following an accident.

13 ENVIRONMENTAL CONTROLS

13.1 Dust Control

Overall risk: Low

Residual risk (after application of management measures): Low

The control measures to manage dust and fugitive emissions are detailed in the Environment Risk Assessment (K18.14~09~004) Section ERA8.

All vehicles delivering and collecting materials are to be containerised and limited to a maximum speed of 10 mph. There will be daily maintenance inspections of storage areas and buildings, with vehicles, plants and machinery being operated and maintained in accordance with manufacturers specifications or annually, whichever is more frequent. All these events will be recorded in the site diary.

Operations which may give rise to dust emissions will not be carried during strong windy conditions. All plant based on site would be equipped with upward facing exhausts and all dust control systems will be routinely maintained and serviced on all plants and machinery. The EoL tyres are shredded into chips (≤ 50 mm) with negligible fine dust generation. Shredders will be slow speed to limit any risk of combustion whilst a recirculating water system will also be installed to dampen the material and further reduce combustion risk and manage the minimal dust emissions within the process

Internal haul routes would be constructed and maintained to minimise dust. The roads and circulation areas will be dampened down in periods of dry weather by spraying water.

13.2 Litter Control

Overall risk: Low

Residual risk: Low

The control measure to manage littering are detailed in the ERA (K18.14~09~004) Section ERA9.

Due to the type of waste receive the likelihood of litter generation is very low. Where litter is generated, the following measures are employed.

The site is subject to regular housekeeping to suppress litter generation, staff are required to litter pick on a 'see it, pick it up' basis.

Where litter is identified as a nuisance on the site boundary, the TCM and management will immediately organise the collection of litter by staff. Priority will be given to eliminating the source, following which off-site areas and the site boundary will be cleared. The source of the litter will be investigated and removed to a container ready for disposal.

13.3 Pests, Vermin, Birds

Overall risk: Low

Residual risk: Low

Due to the type of waste receive the attraction and harbouring of pests, vermin or birds is very low. The control measure to manage Pests, Vermin and Birds are detailed in the ERA (K18.14~09~004) section ERA10.

All reasonable measures will be taken to prevent and minimise the occurrence of pests. Daily site inspections and good housekeeping procedures will be maintained in order to reduce any occurrence and allow appropriate measures to be taken where necessary.

If an increase in a pest population is observed, the source will be investigated in order to undertake the most effective mitigation measures.

13.4 Mud & Debris

Overall risk: Medium

Residual risk: Low

The control measures to manage mud and debris fugitive emissions are detailed in the Environment Risk Assessment (K18.14~09~004) section ERA11.

Vehicles will be visually inspected before leaving the site and advised if there is a need to clear or remove mud or debris. The site itself will also be cleaned as necessary by site personnel to prevent off site mud or debris deposits. Regular housekeeping of all areas will be undertaken on a weekly basis to maintain cleanliness.

13.5 Water

Overall risk: Medium

Residual risk: Low

The control measure to manage the risk of contaminated water run-off are detailed in the ERA (K18.14~09~004) Section ERA12.

The likelihood of significant contaminated run-off is negligible as liquid waste is not permitted on site, and the processing of EoL tyres will be undertaken on an impermeable surface within a sealed drainage system with water recirculation.

13.6 Noise & Vibration

Overall risk: Medium

Residual risk: Low

The Environment Risk Assessment (K18.14~09~004), section ERA14, identifies the risk and control measures for noise and vibration.

The site is located within a large industrial area, is close to the M6, as shown in the Sensitive Receptors Plan (K18.14~20~002), and operations are only carried out within permitted hours, thus there will not likely be a higher noise level generated in relation to the surrounding area. The Noise Impact Assessment confirms this (K18.14~09~004 Appendix C).

All vehicles, plants and machinery will be inspected and maintained regularly in line with maintenance schedule set out by the manufacturer's specifications.

14 EMISSIONS AND MONITORING

There are no point source emissions identified which may cause significant risk.

Appropriate measures have been taken to control emissions of substances not controlled by emissions limits.

15 CLIMATE CHANGE

Climate change may increase risk of uncontrolled emissions or smoke and fire water; increase in waste reactions or fires involving heat sensitive or combustible waste; and increase in high temperature expansion and stress of plant, pipework and fittings. There is also a risk if UV degradation of plastic pipes and hoses causing them to fail; increased dust emissions from processing areas (risk of reduced water availability for dust suppression); and potential increased risk of wildfires impacting the site.

Potential effects from climate change have been identified within Table ERA15 of the Environmental Risk Assessment (ERA) (K18.14~09~004), where management procedures and controls are identified to reduce identified risk.

The effects of climate change and management will be reviewed on an annual basis, along with the Management System or following an extreme climate event.

15.1 Temperatures

Temperature fluctuations are unlikely to impact the current waste stream accepted on to site. If the waste streams change then this will be re-assessed.

15.1.1 Summer

The potential for fire if the temperature exceeds the heat rating for the EoL tyres, the potential for UV degradation, waste reactions, increased dust emissions, drought, wildfires and risk of pests and scavengers have all been considered, along with the quick turnaround times of the EoL tyres on site.

The appropriate mitigations can be found in the Fire Prevention Plan (K18.14~09~006), and the Environmental Risk Assessment (K18.14~09~004).

15.1.2 Winter

The potential for odour complaints and pest infestations in warmer winter temperatures have been considered and appropriate mitigations can be found in the Fire Prevention Plan (K18.14~09~006), and the Environmental Risk Assessment (K18.14~09~004).

The risk of freezing pipes in response to lower winter temperature has also been considered in the Fire Prevention Plan (K18.14~09~006), and the Environmental Risk Assessment (K18.14~09~004).

15.2 Rising Sea Levels

The proposed site is positioned 695 m from Spittle Brook which is its closest water source and 1.3 km from the River Mersey. The site is located in a Very Low Risk Flood Zone for both fluvial and pluvial processes (Environmental Risk Assessment - K18.14~09~004).

15.3 Changes in Rainfall Patterns and Intensity

The potential for increased site surface water and flooding have been considered and mitigated for in the Environmental Risk Assessment (K18.14~09~004), which considered the site's drainage system (Site Layout and Drainage Plan K18.14~20~007), which is designed to cope with rainfall at high intensity and an increased frequency. The drainage systems will be inspected and maintained regularly.

15.4 Heat Waves

Long periods of hot and dry weather have been considered, with cooling systems, emergency water usage and fire prevention plan all in place as shown in the Fire Prevention Plan (K18.14~09~006), and the Environmental Risk Assessment (K18.14~09~004).

15.5 Storms

The potential for high winds causing damage to buildings, infrastructure and plants will be mitigated by regularly surveying of the sites infrastructure quality and keeping up-to-date with all EA and Government weather reports (Environmental Risk Assessment - K18.14~09~004).

16 COMMUNICATION

16.1 Complaints

All complaints received concerning the permitted site will be dealt with in accordance with the existing complaints procedure in the Management System.

The Technically Competent Manager (TCM) is responsible for responding to complaints and implementing the complaints procedure. All complaints will be investigated within 24 hours upon receipt.

Upon receipt of a complaint, either directly from a neighbouring resident or indirectly via the Regulator. The following information will be requested from the complainant:

- Name;
- Address;
- Contact details;
- Date(s) and time(s) to which the complaint relates; and
- Nature of the complaint and any other details which may assist in the identification of the source, activity or circumstances which prompted the complaint.

The timings and description of the complaint will be analysed in conjunction with the activities and meteorological conditions logged on site without delay to identify the odour source. The complainant may be asked to keep ongoing log for correlation with the site operational log. Once the source or activity is identified suitable mitigation measures will be implemented without delay to prevent odour emissions.

The details of the complaint and any subsequent investigation will be recorded in Murfitts Industries Limited Complaint Form or other format recording relevant information.

Records relating to management review, complaints, internal audits and inspections are held for a minimum of six years.

On receipt of a complaint, the TCM, or nominated person, will investigate the complaint and where substituted swiftly rectify the source.

Where contact details are made available, the complainant will be contacted within 24 hours to check that the mitigation measures rectify the issue.

Where additional time is required to undertake repair or replacement of infrastructure which has caused the complaint, the complainant will be contacted with details on the actions being taken and the estimated timescale for completion.

16.2 Non-conformances, Corrective & Preventative Actions

Any non-conformances recorded by the TCM or the Environment Agency will be actioned in a timely manner or in line with an appropriate time scale set by the Environment Agency.

Non-conformances will be remedied so that the operation that led to the non-conformance is prevented or changed, to ensure compliance with the environmental permit.

Corrective actions will be recorded in the site diary.

17 DOCUMENTS & RECORDS

17.1 Records & Reporting

As a minimum, the following records must be kept ensuring compliance with the requirements of the Environmental Permit:

- A copy of the site permit;
- Site Management System Summary and all associated documents;
- Operational procedures;
- Site and activity risk assessments;
- Competence and training records;
- Compliance records; and
- Duty of Care documentation and Environment Agency (EA) waste returns.

Records must be retained for 6 years; unless they relate to off-site environmental or health effects, or the condition of the land or groundwater when they shall be retained until permit surrender.

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

17.2 Notification

Notification condition specifies under what circumstances the Environment Agency must be notified. Whilst the table below summarises these, reference should always be made to the current Environmental Permit to confirm exact requirements.

Table 6: Notifications required by the permit

Condition	Requirement	When
TBC	Detection of any malfunction, breakdown or failure of equipment or techniques, accident or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution.	Without delay using Schedule 5 Form
TBC	Any breach of a limit specified in these standard rules.	
TBC	Any significant adverse environmental effects.	
TBC	Changes to the operator's trading name, registered name or registered office address.	Within 14 days
TBC	Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.	Within 14 days
TBC	Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations	Within 14 days – notification should contain a description of the proposed change in operation.

17.3 Security

Copies of all relevant Environmental Permits, access to the Management System, and any other codes of practice will be available at the site office, with electronic back-ups.

Records of all waste received at, and removed from, the site will be maintained on site and reported to the EA on a quarterly basis.

Records will be kept in accordance with The Waste (England and Wales) Regulations 2011 (as amended) and the conditions of the Environmental Permit.

17.4 Availability

In accordance with the condition requiring records to be kept, all records required under the terms of the Permit shall:

- Be legible;
- Be made as soon as reasonably practicable;
- If amended, be amended in such a way that the original and any subsequent amendments remain legible or are capable of retrieval; and
- Be retained, unless otherwise agreed with the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until Permit surrender:
 - off-site environmental effects; and
 - matters which affect the condition of land and groundwater.

All records, plans and the management system required to be maintained by the Permit shall be held on site.

18 REVIEW THE MANAGEMENT SYSTEM

The Management System Summary will be reviewed in its entirety at least annually or following any substantial change in site operations.

Other activities which may prompt review of the Management System are variations to the environmental permit, accident, complaint, breach or a change in the site setting or sensitive receptors.

Where the review results in required changes, this will be documented and maintained with the site records, for example, changes to environmental management measures, new or altered equipment.

19 SITE CLOSURE

Following cessation of operations on site Murfitts Industries Limited will clear the site of all waste materials, clear any drainage systems, and remove plant, equipment and any installed infrastructure.

They will plan for the closure of the site through maintaining records of waste inputs, site development and maintenance. Following any pollution incidents, records of actions taken, any remedial works, and verification reports undertaken shall be kept, as well as any monitoring results.

To evidence that the site operation has not caused a detrimental impact to the surrounding environment, the information collated during the lifetime of the permit will be utilised to prepare the permit surrender.

20 AVAILABILITY OF MANAGEMENT SYSTEM

All site operational staff will be trained in the contents of the Management System to ensure compliance and consistent operation of the site.

A copy of the Management System Summary and all associated documents will be made available at the Company's main office for reference purposes and is available on request to interested parties.



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