Annex 5 - T8 Mechanical treatment of end-of-waste tyres

Part 1: Specific issues and proposed changes

	Issue detail	Rationale for change	Proposed changes
Illegal disposal	The main issue is that the exemption is used for illegal disposal rather than recovery.	Reducing quantities of tyres allowed will help to identify more quickly when a site is being operated illegally. T8 activities often undercut permitted waste operations where there are tighter restrictions and more checks on compliance through site inspection which is funded through permit subsistence charges.	Very strict limits and conditions that will mean most will need to be permitted.
Annual waste acceptance	There is no annual waste acceptance but the 40 tonnes a week treatment limit equates to 249,600 car or van tyres.	Lowering the quantities significantly means that it can be identified earlier if an exempt activity is becoming out of control.	Restrict to 20 tonnes per year.
Risks from combustible wastes and stockpiling	Tyres especially any that have been contaminated have been identified as a combustible waste. Stockpiling and abandonment are common.	All combustible wastes should have the same controls as identified in the Fire Prevention Plan Guidance to reduce and control the risk from fire relative to the size and risk of the exempt activity. Lowering the quantities significantly means that it can be identified earlier if an exempt activity is becoming out of control.	3 months storage limit. Maximum 4m height stack. Max 2.5 tonnes storage.

Part 2: Option 2 - Proposal T8 - Mechanical treatment of end-of-waste tyres

All	Current conditions		Changes proposed under Option 2			
Specified activities	 Cleaning tyres and separating from rims Re-treading of tyres for re-use Baling, peeling, shaving, shredding Granulating Associated storage 		 Cleaning tyres and separating from rims Re-treading of tyres for re-use Baling, peeling, shaving, shredding Granulating Associated storage 			
General conditions applying to all wastes	Granulating is carried on indoors only		Granulating is carried on indoors only			
Waste types	Waste codes	Annual acceptance (tonnes) / 7-day throughput	Storage limits and conditions	Waste codes	Annual acceptance (tonnes) / 7-day throughput	Storage limits and conditions
End of life tyres and shredded or granulated end-of-life tyres	16 01 03 19 12 04	60 tonnes of truck tyres per 7 days (1200 commercial tyres per 7 days or 62,400 per year) OR 40 tonnes of any other tyres per 7 days (4800 car or van tyres per 7 days or 249,600 tyres per year)	3 months Combined storage limit of all wastes stored on site at any one time limited to 60 tonnes (1200 commercial tyres/4800 car or van tyres)(128-214 m³) No waste pile may be more than 10 tonnes	16 01 03 19 12 04	20 tonnes per year (2,400 car or van tyres or 400 commercial tyres) Max 0.5 tonne (60 tyres) end-of life tyres in any form per week. (10 Commercial tyres) (0.5 tonnes of shred)	3 months Combined storage limit of whole tyres or treated tyres (tyre crumb, shavings etc.) stored on site limited to 2.5 tonnes Max stack height 4m Where stored in containers each container must be accessible in case of fire