Government of Western Australia
Department of Water and Environmental Regulation

Works Approval

Works approval number	W6848/2023/1
Works approval holder	Complete Tyre Solutions Tyre Recycling Pty Ltd
ACN	644 200 528
Registered business address	283 Rokeby Road SUBIACO WA 6008
DWER file number	DER2023/000600
Duration	17/10/2024 to 16/10/2029
Date of issue	17/10/2024
Premises details	CTS Tyre Recycling 82 and 86 Altitude Drive NEERABUP WA 6031 Legal description - Lot 104 on Deposited Plan 426671 and Lot 105 on Deposited Plan 425769

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	**Assessed production / design capacity**
Category 57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	Up to 250,000 tyres at any one time
Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated or discharged onto land.	30,000 tonnes per annual period

This works approval is granted to the works approval holder, subject to the attached conditions, on 29 May 2025, by:

Hayden Nebel

Digitally signed by Hayden Nebel
Date: 2025.05.29 13:54:05 +08'00'

SENIOR INDUSTRY REGULATION OFFICER
APPROVALS – STATEWIDE DELIVERY
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Works approval history

Date	Reference number	Summary of changes
17/10/2024	W6848/2023/1	Works approval granted.
29/05/2025	W6848/2023/1	Extension to time-limited operations to allow for submission and assessment of a licence application.

Interpretation

In this works approval:

(a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;

(b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;

(c) where tables are used in a condition, each row in a table constitutes a separate condition;

(d) any reference to an Australian or other standard, guideline, or code of practice in this works approval:

  (i) if dated, refers to that particular version; and

  (ii) if not dated, refers to the latest version and therefore may be subject to change over time;

(e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and

(f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This works approval requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this works approval.

Works approval conditions

The works approval holder must ensure that the following conditions are complied with:

Fire and emergency management plan

1. The works approval holder must implement a Fire and Emergency Management Plan prepared by a suitably qualified fire management consultant that is consistent with Australian Standard AS 3745. The plan must include, but is not limited to:

(a) how fires will be prevented, detected, responded to, suppressed, contained and controlled for all approved activities addressing all waste types and for all stages of the waste handling, sorting and storage process;

(b) in the event of a fire occurring within the approved activities, how impacts to the environment and human health will be mitigated;

(c) how firewater will be contained and managed to prevent offsite discharge;

(d) how staff will be trained in fire and emergency response on an ongoing, annual basis;

(e) details on the firefighting equipment in place at the premises, it's accessibility and fire response capabilities and responsibilities;

(f) a premises map displayed at the front of the premises depicting after-hours contact details, plus the location and layout of:

(i) fire hose reels, hydrants, sprinklers and isolation points;

(ii) all booster assembly cabinet locations and booster assembly arrangements;

(iii) electrical isolation points;

(iv) sub-surface drainage infrastructure, including details on flow direction and off-site discharge locations;

(v) system shutdown points; and

(vi) fire response access points to the premises.

(g) tyre storage plans depicting:

(i) tyre stockpile locations and sizes; and

(ii) actual onsite separation distances

(h) hazmat manifest displayed at front of the premises.

(i) notification procedures for fire and major spill incidents;

Construction phase

Infrastructure and equipment

2. The works approval holder must:

(a) construct and/or install the infrastructure and/or equipment;

(b) in accordance with the corresponding design and construction / installation requirements; and

(c) at the corresponding infrastructure location

as set out in Table 1.

Table 1: Design and construction / installation requirements

	Infrastructure	Design and construction / installation requirements	Infrastructure location
1.	External waste tyre receival and storage area (Lot 104)	a) Ground surface must be a concrete lined (permeability of at least $1x10^{-9}$ m/s) hardstand. b) Concrete bunding must be installed around the internal perimeter of the premises to ensure surface water is able to be contained. c) A perimeter vehicular access clearance of 6m must be clearly marked to allow emergency vehicles to access the waste storage areas during an emergency response. d) A minimum 4.5m height solid screen/retaining wall is to be constructed on the east lot boundary to screen neighbouring properties direct line-of-sight to the external primary shredder plant in accordance with the Environmental Noise Assessment.	As shown in Schedule 1, Figure 3, Figure 4 and Figure 5
2.	Premises access	Minimum of two premises entry/exits to be provided unless otherwise approved by DFES.	As shown in Schedule 1, Figure 3 and Figure 4
3.	Warehouse and awning (Lot 105) containing: – Extended tyre storage area (under awning) – Tyre feeder (under awning) – Primary shredder (under awning) – Secondary shredder (Multi purpose rasper) – Granulator x2 – Classifier (textile/fabric separation) x2 – Aspirator (tyre granule classification) – Crackermill – Bulk bag filling stations with cooling augers x3 – Steel cleaning plant – Baghouse filter (dust extraction and air filtration system) – Plant conveyor line – Tyre crumb and tyre derived fuel product storage bays	a) Ground surface must be a concrete lined (permeability of at least $1x10^{-9}$ m/s) hardstand. b) Must contain an automatic fire sprinkler system installed as a separate system to the fire hydrant system in accordance with AS 2118.1 which is connected to the Direct Brigade alarm system. c) The shredding and granulating plant must be equipped with dust extraction systems. d) Dust extraction stack must be constructed to a minimum height of 12.3 metres and must be fitted with the baghouse filter. e) Baghouse and secondary shredder must be fitted with a spark detection and sprinkler system that is able to cease equipment operations and extinguish fire within the equipment. f) Baghouse to be fitted with a BarkerBille silencer or equivalent on the suction side air intake and pressure side exhaust in accordance with the Environmental Noise Assessment. g) The plant conveyor line must be fitted with a fire sprinkler system. h) Maximum ceiling height of 9.1m. i) Smoke and heat vents to be installed in accordance with AS 2665.	As shown in Schedule 1, Figure 2 and Figure 6

	Infrastructure	Design and construction / installation requirements	Infrastructure location
4.	Fire suppression system and water storage	a) A minimum of 3 fire hydrant outlets to be installed in accordance with AS 2419.1 to service the external waste tyre receival and storage area. b) A minimum of 2 fire hydrant outlets to be installed in accordance with AS 2419.1 to service the internal waste storage warehouse and awning. c) The fire suppression system must have a minimum water storage capacity that provides each fire hydrant with 10 L/sec simultaneously for a minimum of four hours and the fire sprinkler system with a peak flow rate of 24mm/min for a minimum of 2 hours. d) Portable fire extinguishers and a fire hose reel system shall be provided in accordance with Australian Standard AS 2444 and Australian Standard AS 2441.	As shown in Schedule 1, Figure 6
5.	Surface water drainage system consisting of: - Surface water drainage grates - Sub-surface collection pits - Pipework and Isolation valves - Sub-surface soakage pits	a) The premises hardstand and surface water drainage system must provide a minimum containment volume to contain all contaminated water runoff. b) Isolation valves must be installed on the sub-surface collection pits/pipework to enable the fire control system to isolate contaminated water from entering the soakage pits when a fire is detected.	As shown in Schedule 1, and Figure 5 and Figure 6

Compliance reporting

3. The works approval holder must within 30 calendar days of an item of infrastructure or equipment required by condition 2 being constructed and/or installed:

(a) undertake an audit of their compliance with the requirements of condition 2; and

(b) prepare and submit to the CEO an Environmental Compliance Report on that compliance.

4. The Environmental Compliance Report required by condition 3, must include as a minimum the following:

(a) certification by a suitably qualified engineer that the items of infrastructure or component(s) thereof, as specified in condition 2, have been constructed in accordance with the relevant requirements specified in condition 2;

(b) as constructed plans and a detailed site plan for each item of infrastructure or component of infrastructure specified in condition 2; and

(c) be signed by a person authorised to represent the works approval holder and contains the printed name and position of that person.

Time-limited operations phase

Commencement and duration

5. The works approval holder may only commence time-limited operations for an item of infrastructure identified in condition 2 where the Environmental Compliance Report as required by condition 3 has been submitted by the works approval holder for that item of infrastructure.

6. The works approval holder may conduct time-limited operations for an item of infrastructure specified in condition 2:

(a) for a period not exceeding 270 calendar days from the day the works approval holder meets the requirements of condition 5 for that item of infrastructure; or

(b) until such time as a licence for that item of infrastructure is granted in accordance with Part V of the *Environmental Protection Act 1986*, if one is granted before the end of the period specified in condition 6(a).

Waste acceptance

7. The works approval holder must only allow waste to be accepted onto the premises if:

(a) it is of a type listed in Table 2;

(b) The quantity accepted is below any limit listed in Table 2; and

(c) It meets any specification listed in Table 2.

Table 2: Waste acceptance

Waste type	Rate at which waste is received	Specification[1, 2]
Inert Waste Type 2 (tyres)	Up to 250,000 tyres may be stored on the premises at any one time	Whole, unburnt passenger and truck tyres. For the purposes of waste tyre volumes, $2m^3$ of shredded, broken or pieces of used tyres are taken to equal 100 used tyres.

Note 1: Additional requirements for the acceptance of controlled waste (including tyres) are set out in the Environmental Protection (Controlled Waste) Regulations 2004.

Note 2: Calculating tyre quantities is set out in the *Environmental Protection Regulations 1987.*

Waste processing

8. The works approval holder must ensure that the waste types specified in Table 5 are only subjected to the corresponding processes and specifications set out in Table 5.

Table 3: Waste processing

Waste type	Process	Process limits and specifications
Inert Waste Type 2 (tyres and rubber pieces)	Shredding, crumbing, granulating and storage	a) Tyre shredding to occur within the warehouse. b) No more than 30,000 tonnes of tyres and rubber pieces are to be processed per annual period.

During time-limited operations, the works approval holder must ensure that the premises infrastructure and equipment listed in

Table 4 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in

9. Table 4.

Table 4: Infrastructure and equipment requirements during time-limited operations

	Site infrastructure and equipment	Operational requirement	Infrastructure location
1.	Internal warehouse, awning and external tyre storage areas	a) All waste tyres must be stored in accordance with GN02 as follows: i. Tyre stacks must not exceed 3.7 m in height, 60m^2 in area outdoors, 30m^2 indoors and 12.5 tonnes in weight (Figure 7). ii. Tyre stacks must not be grouped in more than 4 stacks (a pile) and must be a minimum of 2.5m apart (Figure 7). iii. Tyre piles must be separated by a minimum of 18m (Figure 8). iv. Tyre stacks must be no closer than 6m from any non-combustible premises boundary or building wall. v. Tyre stacks must be no closer than 18m from any combustible boundary of an adjacent property allotment or combustible building wall. vi. A minimum clearance distance of 1 metre must be maintained along paths of travel to required exits and to firefighting equipment and be unobstructed at all times. b) Tyres must be stacked on their side; or if stored on their treads, must be suitably contained by a system to prevent rolling. c) Ground surface must be maintained free of cracks, damage and have a permeability of at least 1x10^{-9} m/s. d) Must be secure at all times to prevent unauthorised access to the building and storage areas from persons not employed on the premises.	As shown in Schedule 1, Figure 2 and Figure 3
2.	Warehouse and awning	a) Dust filtration systems must be maintained and operational during the operation of the shredding and granulating plant. b) All shredded and crumbed tyre product must be stored in accordance with GN02 as follows: i. Tyre product must be stored within the warehouse as shown in Schedule 1, Figure 3. ii. Tyre product must be stored within bulk bags no deeper than 3m. iii. Tyre product must be free of tyre remains subjected to fire, oil, grease, petrol and diesel fuels, fibrous organic matter or other material that could create a fire hazard. iv. A minimum of 3m is to be maintained from internal building walls.	As specified in Schedule 1, Figure 2
3.	All on-site fire management and prevention equipment	a) All on-site fire management and prevention equipment to be stored so access is not impeded by infrastructure or equipment used in site operations. b) All on-site fire management and prevention equipment must be maintained and in good working order at all times in accordance with AS 1851.	As shown in Schedule 1, Figure 6

10. The works approval holder must ensure the fire and emergency management requirements in Table 5 are complied with in the event of a fire.

Table 5: **Fire and emergency management requirements**

Management Requirement		Fire and emergency management requirements
1.	Firewater containment	a) Firewater that may result at the premises from fire-fighting activities must be: (i) contained on the premises within the capacity of hardstand and low permeability infrastructure. (ii) does not escape to the premises' soakage pits, adjacent premises or exposed soil areas. b) The containment capacity for firewater must be calculated with the fire hydrant flow rates prescribed in Australian Standard AS 2419.1: (i) for all fully-enclosed structures; and (ii) individually for each outside hardstand and low permeability catchment area. c) The containment capacity for firewater must be permanent or achieved automatically when the fire system is activated on the premises. d) The sub-surface collection pit/pipework isolation valves must be maintained and operational in the case of a fire to isolate contaminated water from entering the soakage pits. e) Arrangements must exist for the removal of firewater, in excess of the containment capacity, by a carrier licensed under the Environmental Protection (Controlled Waste) Regulations 2004, to ensure firewater does not discharge to the environment.
2.	Fire management	a) The size of stockpiles of recycled material (tyre crumb) that could cause a fire hazard must be minimised. b) A sufficient number of fire hoses on the premises must be provided such that all areas of the premises can be reached. c) Ensure that any fire on the premises is extinguished as soon as possible.
3.	Notifications[1]	a) The works approval holder must immediately notify the CEO of: i. any fire on the premises; and ii. any accident, malfunction, or emergency which results or could result in the discharge of fire-fighting wash water or other wastes from the premises.

Note 1: Notification requirements may also include advising the Department of Fire and Emergency Services, Western Australian Police, Ambulance Services and neighbouring premises.

Emission points and limits during time limited operations

11. The works approval holder must ensure that the emissions specified in Table 6 are discharged only from the corresponding discharge point and does not exceed the limit when monitoring in accordance with condition 13.

Table 6: Authorised discharge points and discharge limits during time limited operations

Emission	Discharge point	Discharge point height	Limit
Particulate matter	Emission point (E1) as labelled in Schedule 1, Figure 2	Minimum of 12.3 metres	< 5 mg/m^3

Monitoring during time limited operations

12. The works approval holder must ensure that monitoring is undertaken in each quarterly period such that there are at least 45 days in between the days on which samples are taken in successive quarters.

13. The works approval holder must monitor emissions to air in accordance with the requirements specified in Table 7.

Table 7: Monitoring of emissions to air

Monitoring location	Parameter	Reporting unit [1]	Frequency	Averaging period	Method
Emission point (E1) as labelled in Schedule 1, Figure 2	PM_{10}	mg/m^3 g/sec	Quarterly	60 minutes	US EPA Method 201A
	TSP	-			US EPA Method 5
	Flow rate	m^3/sec			US EPA Method 2

Note 1: All units are referenced to STP dry.

14. The works approval holder must undertake the monitoring specified in Table 8 during time-limited operations.

Table 8: Monitoring of inputs and outputs during time-limited operations

Waste type	Unit	Frequency
Inert Waste Type 2 (tyres)	Tyres[1]	Each load entering the premises
Processed tyre material (tyre crumb, shred, chip, granular product and tyre derived fuel)	tonnes	Each load leaving the premises
Waste steel		

Note 1: Calculating tyre quantities is set out in the *Environmental Protection Regulations 1987.*

Noise monitoring

15. Within 30 days of the commencement of time-limited operations, the works approval holder must retain the services of a person qualified and experienced in the area of environmental noise assessment and who by their qualifications and experience is eligible to hold membership of the Australian Acoustical Society or the Australian Association of Acoustical Consultants to:

(a) investigate the nature and extent of noise emissions from the premises;

(b) assess in accordance with the methodology required in the Environmental Protection (Noise) Regulations 1997, the compliance of the noise emissions from the primary activities, against the relevant assigned levels specified in those Regulations; and

(c) compile and submit to the works approval holder within 120 days of the commencement of time-limited operations, a report in accordance with condition 16.

16. A report prepared pursuant to condition 15(c) is to include:

(a) a description of the methods used for monitoring and/or modelling of noise emissions from the premises;

(b) details and the results of the investigation undertaken pursuant to condition 15(a); and

(c) details and results of the assessment of the noise emissions from the premises, against the relevant assigned levels in the Environmental Protection (Noise) Regulations 1997 undertaken pursuant to condition 15(b).

17. The works approval holder must submit to the CEO the report prepared pursuant to condition 15(c) within 14 days of receiving it.

18. Where an assessment pursuant to condition 15(b) indicates that noise emissions do not comply with the relevant assigned levels in the Environmental Protection (Noise) Regulations 1997, the works approval holder must:

(a) within 60 days of receiving an assessment report pursuant to condition 15(c) prepare a plan to ensure the undertaking of the licensed activity will no longer lead to any contravention of the Environmental Protection (Noise) Regulations 1997*;* and

(b) provide to the CEO a copy of the plan prepared pursuant to condition 18(a) within 30 days of its preparation.

Records and reporting (general)

19. The works approval holder must submit the Fire and Emergency Management Plan required by condition 1 to the CEO prior to commencement of time-limited operations.

20. The works approval holder must record the following information in relation to complaints received by the works approval holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions from the premises:

(a) the name and contact details of the complainant, (if provided);

(b) the time and date of the complaint;

(c) the complete details of the complaint and any other concerns or other issues raised; and

(d) the complete details and dates of any action taken by the works approval holder to investigate or respond to any complaint.

21. The works approval holder must maintain accurate and auditable books including the following records, information, reports, and data required by this works approval:

(a) the works conducted in accordance with condition 2;

(b) any maintenance of infrastructure that is performed in the course of complying with condition 2;

(c) monitoring programmes undertaken in accordance with conditions 13 and 14;

(d) notifications in accordance with condition 10; and

(e) complaints received under condition 20.

22. The books specified under condition 21 must:

(a) be legible;

(b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;

(c) be retained by the works approval holder for the duration of the works approval; and

(d) be available to be produced to an inspector or the CEO as required.

23. The works approval holder must submit to the CEO a report on the time-limited operations within 30 calendar days of the completion date of time-limited operations or 90 calendar days before the expiration date of the works approval, whichever is the sooner.

24. The works approval holder must ensure the report required by condition 23 includes the following:

(a) a summary of monitoring results obtained during time limited operations under conditions 13 and 14.

(b) a review of performance and compliance against the conditions of the works approval; and

(c) where the manufacturer's design specifications and the conditions of this works approval have not been met, what measures will the works approval holder take to meet them, and what timeframes will be required to implement those measures.

Definitions

In this works approval, the terms in Table 9 have the meanings defined.

Table 9: Definitions

Term	Definition
Australian Standard 1851	means Standards Australia *AS 1851 Maintenance of Fire Protection Systems and Equipment*
Australian Standard AS 2118.1	means Standards Australia *AS 2118.1 Automatic fire sprinkler systems General systems*
Australian Standard AS 2419.1	means Standards Australia *AS 2419.1 Fire hydrant installations Part 1: System design, installation and commissioning*
Australian Standard AS 2441	means Standards Australia *AS 2441 Installation of fire hose reels*
Australian Standard AS 2444	Means Standards Australia *AS 2444 Portable fire extinguishers and fore blankets – Selection and location*
Australian Standard AS 2665	means Standards Australia *AS 2665 Smoke/heat venting systems – Design, installation and commissioning*
Australian Standard AS 3745	means Standards Australia *AS 3745 Planning for emergencies in facilities*
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department administering the *Environmental Protection Act 1986* Locked Bag 10 Joondalup DC WA 6919 info@dwer.wa.gov.au
condition	a condition to which the works approval is subject under section 62 of the *Environmental Protection Act 1986.*
Department	means the department established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V Division 3 of the EP Act.
DFES	Department of Fire and Emergency Services.
discharge	has the same meaning given to that term under the EP Act.
emission	has the same meaning given to that term under the EP Act.

Term	Definition
Environmental Compliance Report	means a report to satisfy the CEO that the conditioned infrastructure and/or equipment has been constructed and/or installed in accordance with the works approval.
Environmental Noise Assessment	means the document entitled: Environmental Noise Assessment – Neerabup Tyre Recycling Facility, completed by Lloyd George Acoustics. Revision 2, 21 August 2023.
EP Act	*Environmental Protection Act 1986* (WA).
EP Regulations	*Environmental Protection Regulations 1987* (WA).
Fire and Emergency Management Plan	means a Fire and Emergency Management Plan that meets the requirements specified in condition 1 of this works approval.
fire management consultant	means a person who: (a) has a minimum of five years of experience working in a supervisory area of fire control system design, installation and commissioning; and (b) is employed by an independent third party external to the works approval holder's business; or is otherwise approved in writing by the CEO to act in this capacity.
firewater	means water that, in the event of a fire, has been used to extinguish a fire, and all materials and combusting products dissolved or suspended within such water, and includes other fire suppressant substances such as foams.
GN02	Means the Department of Fire and Emergency Services *Guidance Note:GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres*.
pile	relating to tyre storage, refers to a group of 4 tyre stacks separated by a minimum of 2.5m.
premises	the premises to which this works approval applies, as specified at the front of this works approval and as shown on the premises map (Figure 1) in Schedule 1 to this works approval.
prescribed premises	has the same meaning given to that term under the EP Act.
quarterly	means a three-month period commencing from 1 January to 31 March, 1 April to 30 June, 1 July to 30 September and 1 October to 31 December.
stack	relating to tyre storage, refers to a grouping of tyres not exceeding 3.7m in height, 60m^2 in area and/or 12.5 tonnes in weight.

Term	Definition
suitably qualified engineer	means a person who: a) holds a Bachelor of Engineering degree recognised by Engineers Australia; and b) has a minimum of five years of experience working in a supervisory area of civil or structural engineering; and c) is employed by an independent third party external to the Works Approval Holder's business; or is otherwise approved in writing by the CEO to act in this capacity.
time-limited operations	refers to the operation of the infrastructure and equipment identified under this works approval that is authorised for that purpose, subject to the relevant conditions.
US EPA Method 2	means the United States Environmental Protection Agency *Method 2 Determination of Gas Velocity and Volumetric Flow Rate (Type S Pitol Tube).*
US EPA Method 5	means the United States Environmental Protection Agency *Method 5 Determination of Particulate Matter Emissions from Stationary sources.*
US EPA Method 201A	means the United States Environmental Protection Agency *Method 5 Determination of PM_{10} and $PM_{2.5}$ Emissions from Stationary Sources (Constant Sampling Rate Procedure).*
waste	has the same meaning given to that term under the EP Act.
works approval	refers to this document, which evidences the grant of the works approval by the CEO under section 54 of the EP Act, subject to the conditions.
works approval holder	refers to the occupier of the premises being the person to whom this works approval has been granted, as specified at the front of this works approval.

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown in pink in the map below.

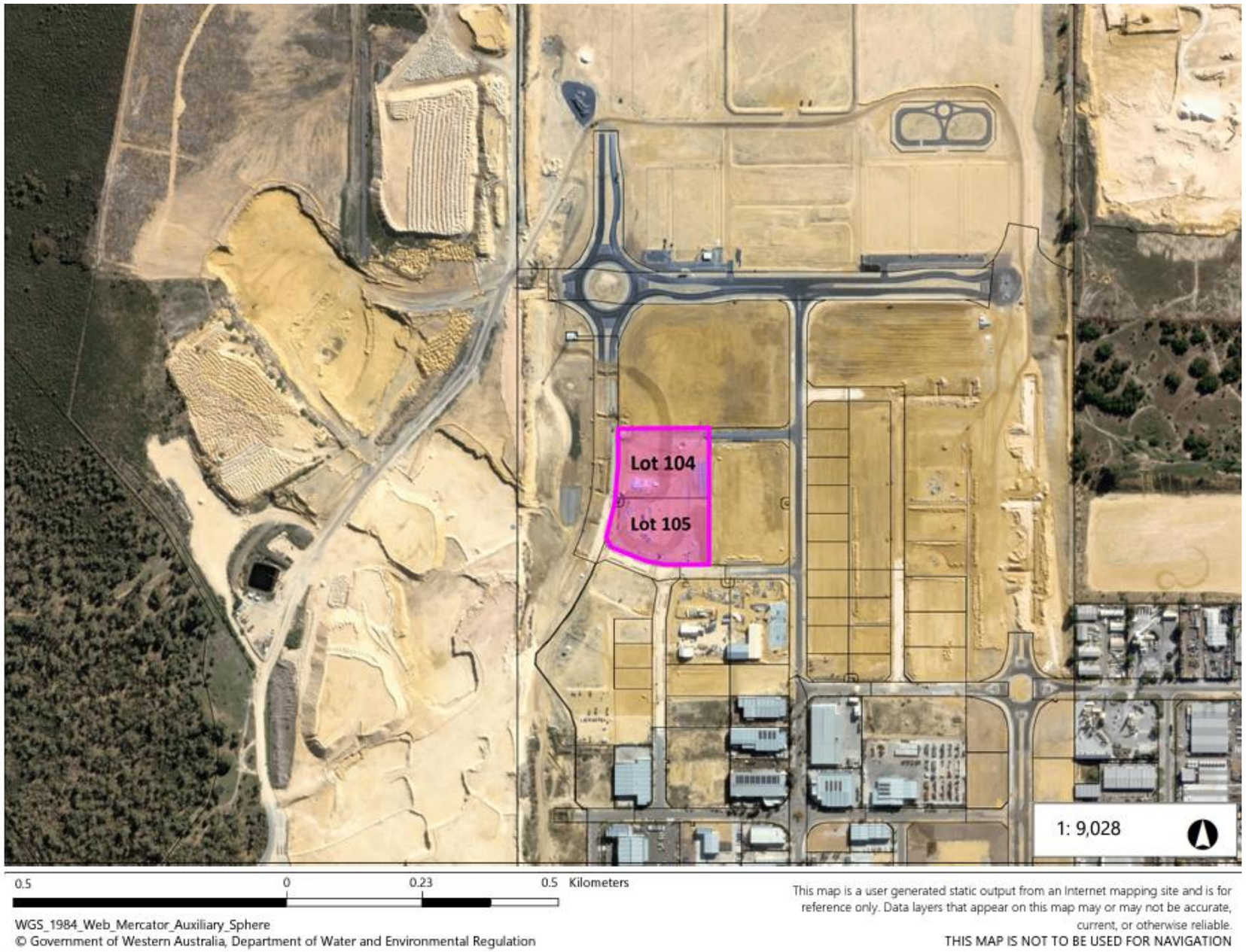

Figure 1: Map of the boundary of the prescribed premises

Proposed warehouse infrastructure and tyre storage locations

The proposed warehouse infrastructure layout and tyre storage is shown in the map below – Lot 105.

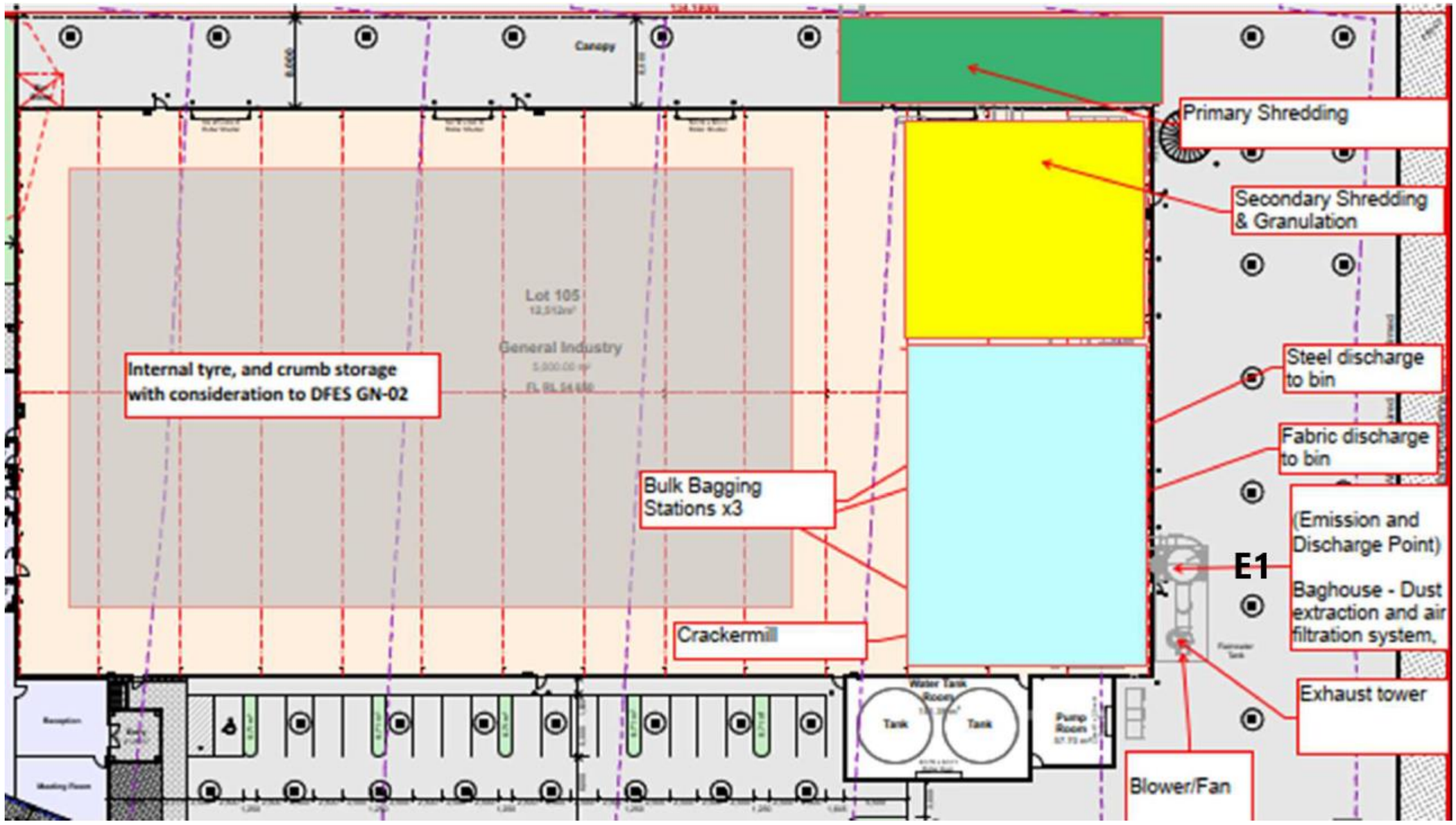

Figure 2: Map of the proposed warehouse infrastructure, air emission monitoring point and tyre storage locations

Proposed external waste tyre storage area

The proposed external waste tyre storage area is shown in the map below – Lot 104.

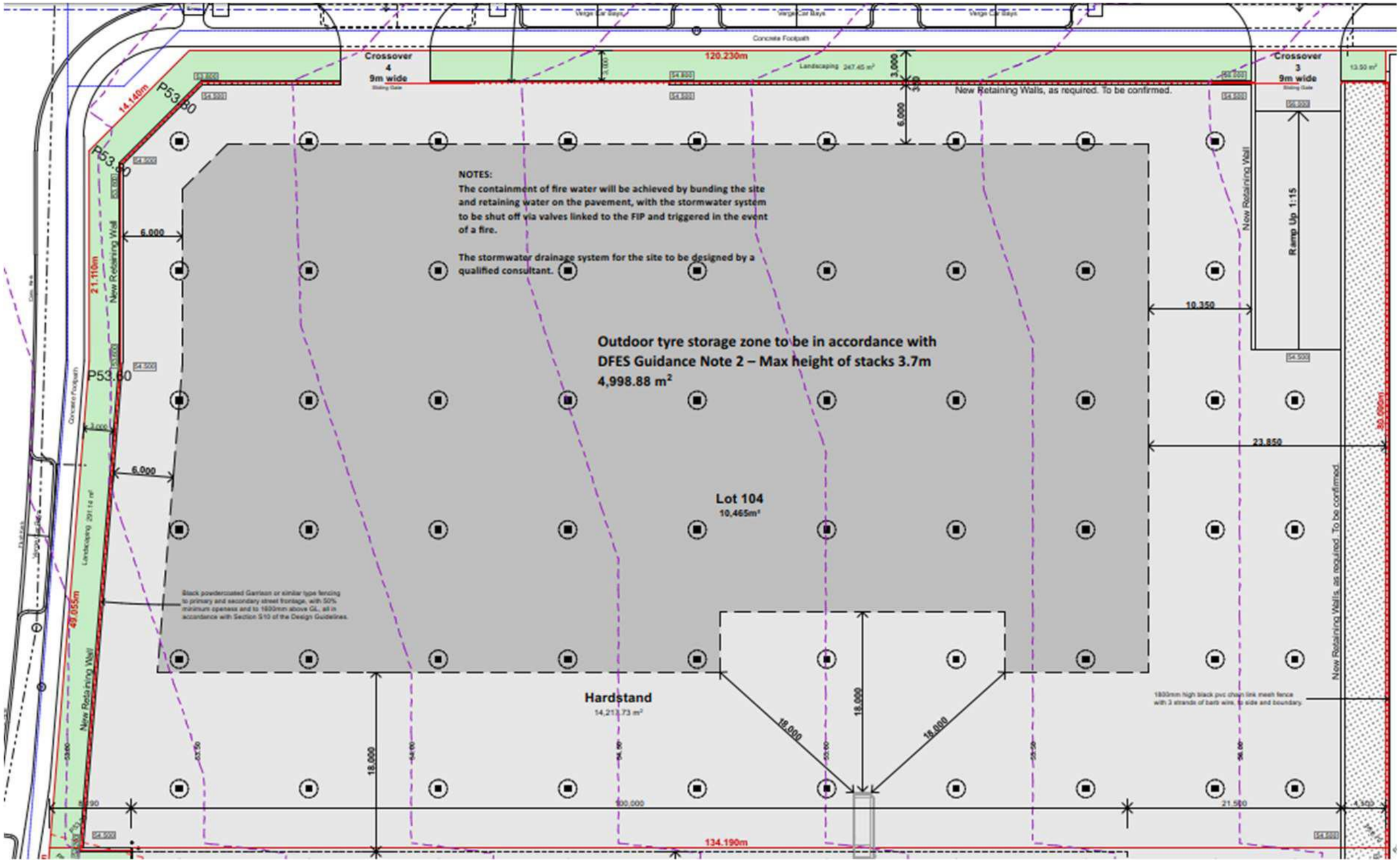

Figure 3: Map of the proposed external tyre storage area

Stormwater drainage and firewater containment area

The proposed premises stormwater drainage and firewater containment area is shown in the site plan below – Lots 104 and 105.

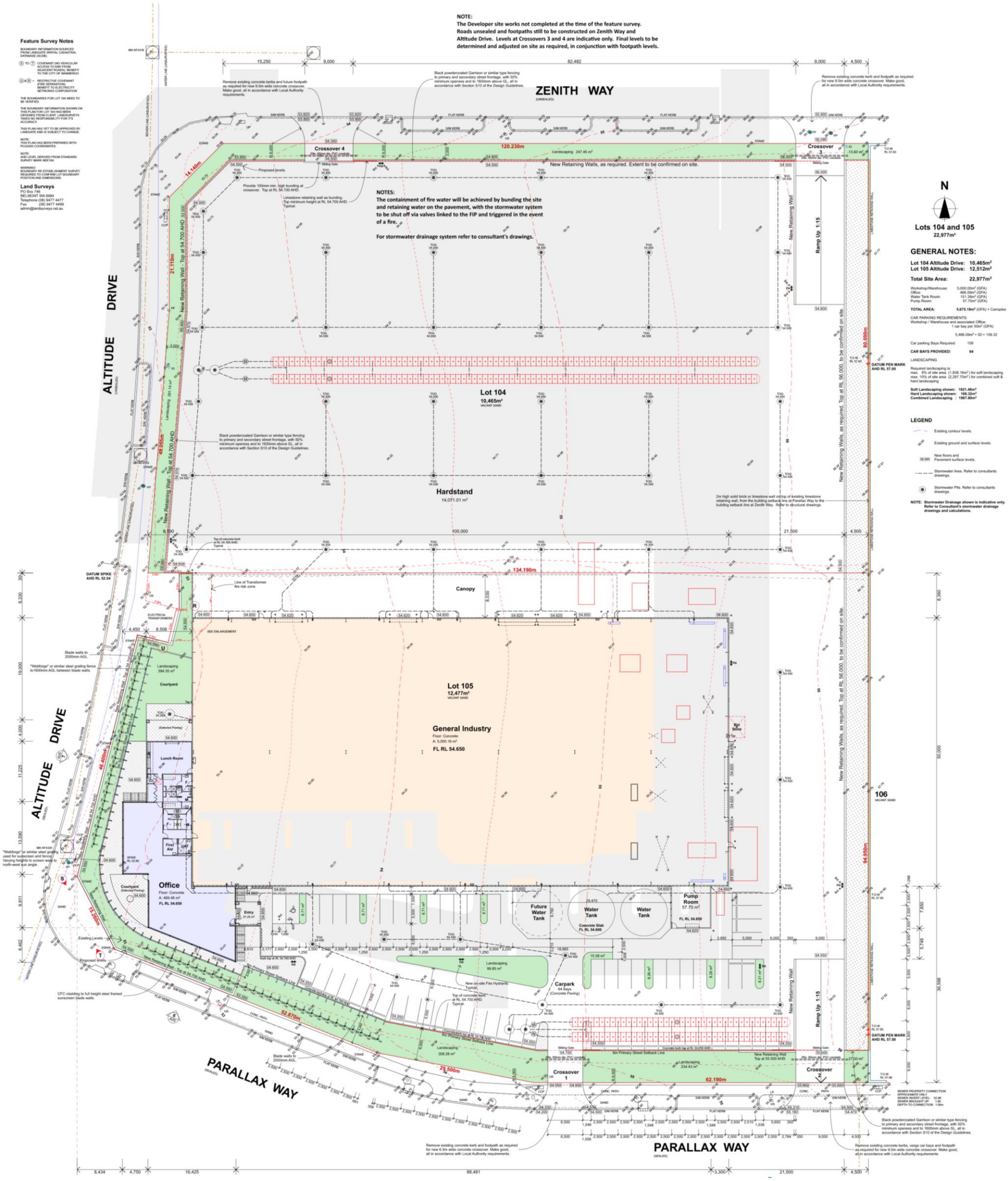

Figure 4: Site plan showing the proposed premises stormwater drainage infrastructure

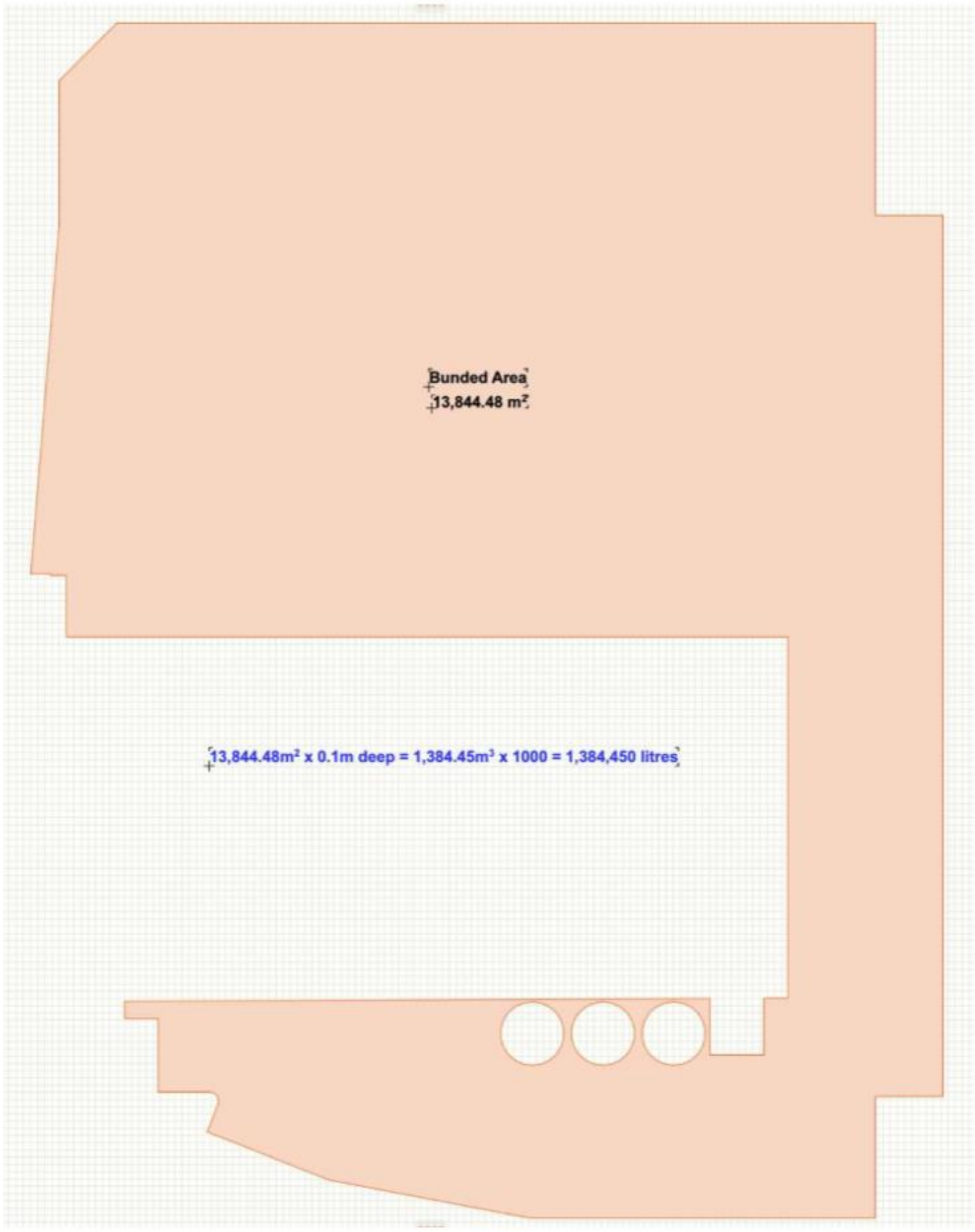

Figure 5: Diagram of the proposed premises fire containment area

Fire equipment locations

The proposed locations of fire hydrants, hose reels and water supply lines are shown in the site plan below.

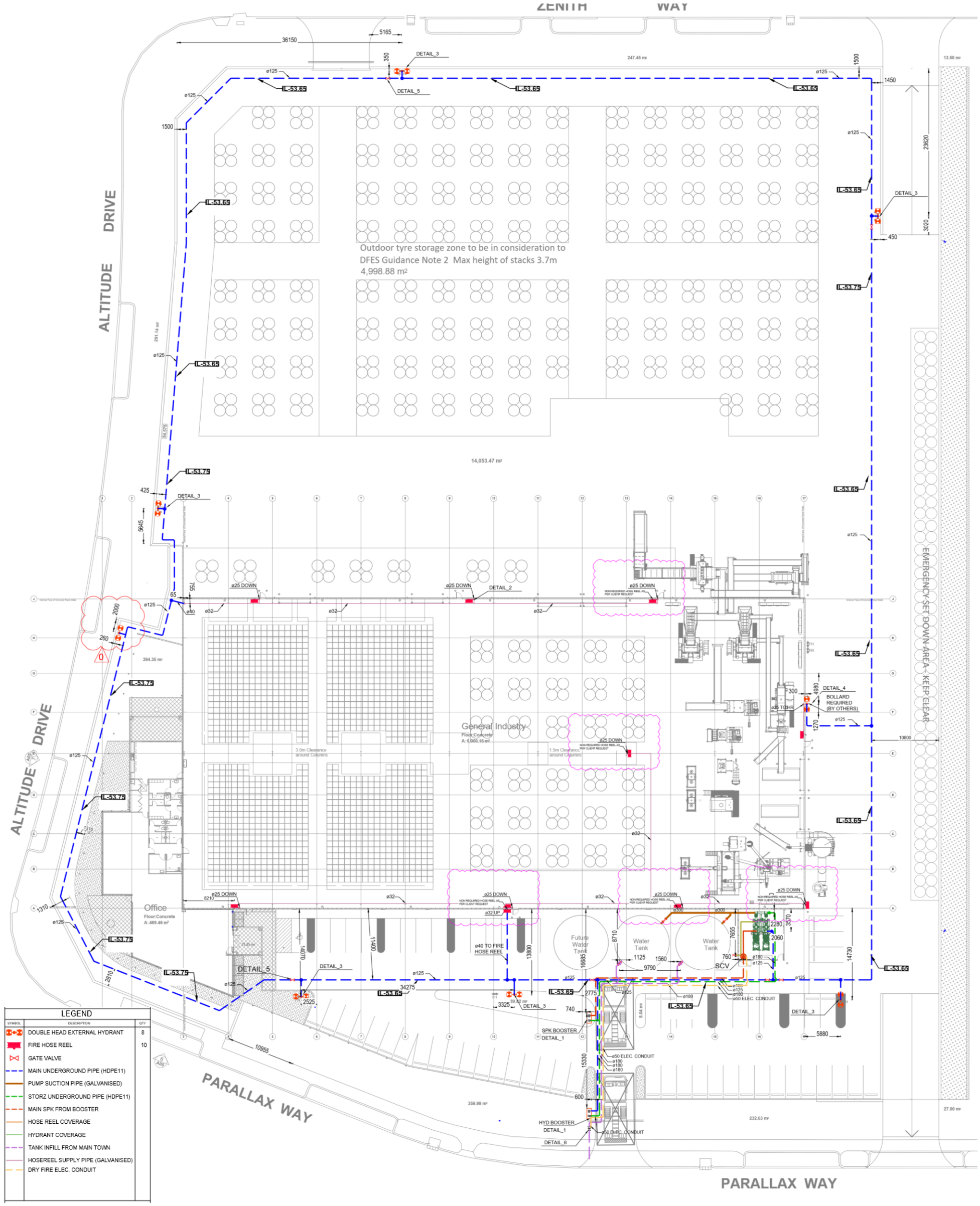

Figure 6: Map of the proposed fire hydrants, hose reels and water supply line location

Schedule 2: Tyre storage requirements

Separation distances between four individual stacks in a group (a pile) are shown below.

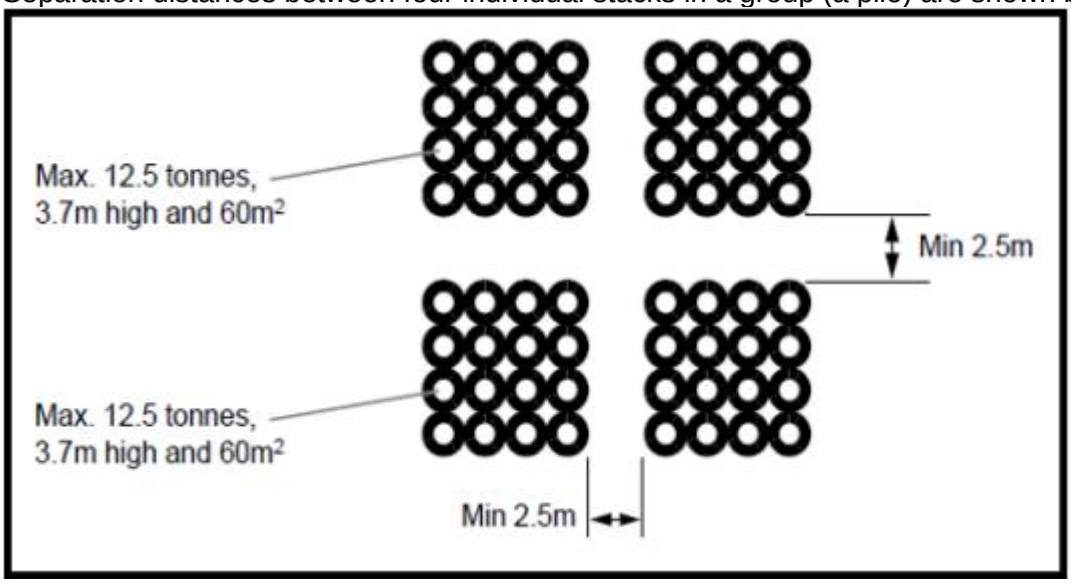

Figure 7: External storage separation distances for each four-pile of tyres

Separation distances between each pile of tyres are show below.

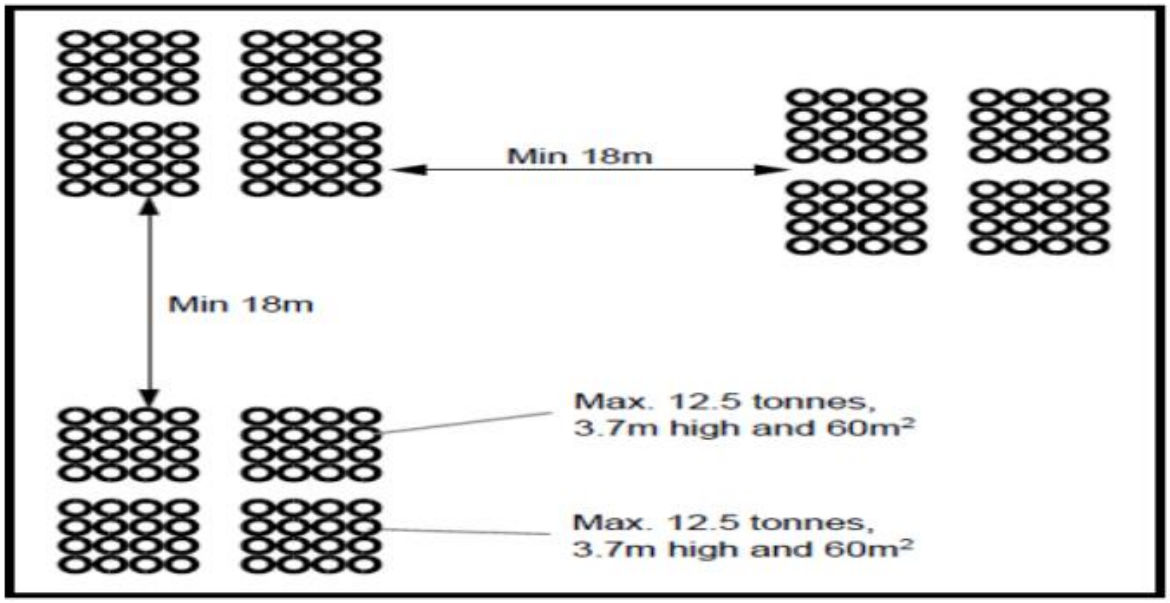

Figure 8: Minimum separation distances between piles for external storage