

# QUICK REFERENCE GUIDE TO TYRE STORAGE REGULATIONS



## Victoria

This quick reference guide has been extracted from the [TSA Best Practice Guidelines for Tyre Storage](#). For a more detailed discussion of the many considerations around tyre storage, please refer back to the [Guidelines](#).

### VIC Tyre Storage Regulations

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Relevant environmental protection laws include the [Environmental Protection Act 2017](#) (EP Act) and the [Environmental Protection Regulations 2021](#) (EP Regulations).

The EP Act outlines environmental duties, including ensuring that hazards are identified and that potential risks to the environment and human health are either eliminated or controlled.

Schedule 1 of the EPA Act requires that site storing more than 5m<sup>3</sup> of waste tyres at any time requires permission from the EPA. The type of permission required depends upon the quantities of tyres stored.

#### The type of EPA permission required to store waste tyres depends on the quantity, as follows:

- EPA Registration of tyre storage is required for sites storing more than 5m<sup>3</sup> of waste tyres, but less than 40 tonnes or 5,000 EPU. This level of storage is for small quantities of tyres, representing lower risk than larger operating sites.
- EPA Operating Licences are required for large waste tyre storage facilities. This involves all sites storing more than 40 tonnes or 5,000 EPU of waste tyres.

In Victoria waste tyres, including whole tyres and tyre pieces, are considered a combustible recyclable waste material (CRWM). More broadly CRWM includes other material types such as plastics, e-waste, wood, paper and cardboard. Any business responsible for receiving, reprocessing or storing of CRWM where there is a risk of fire is to minimise the risk of harm to human health and the environment from fire as far as reasonably practicable.

When developing waste tyre storage plans, for both indoors and outdoors, operators are refer to the [Management and Storage of Combustible Recyclable and Waste Materials - Guideline \(ver1667.3\)](#) or CRWM Guide. This Guide has been developed to assist operators comply with the EP Regulations, and EPA permits (Registrations and Licences) include storage conditions in accordance with the Guide.

**The CRWM Guide requires a risk based assessment for tyre storage. Consult the Guide directly for further details. In summary however the performance of operator storage is to achieve acceptable risk mitigation, with success factors including:**

- Compliance with waste storage permission thresholds, or waste is stored and managed which minimises the risk of fires so far as reasonably practicable.
- Compliance with your permission conditions.
- Providing information on the site to emergency services.
- Ensuring site access points (including any rear access) are evident and unobstructed. Laying out your storage to reduce heat transfer.

- Lay out storage to reduce potential ignition sources.
- Managing storage layout according to the site plan and permission conditions including pile dimensions where applicable.

## Fire Safety Requirements

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The CRWM Guide also outlines fire safety requirements expected of operators. Key elements provided in the Guide including the following fire safety requirements:

### Effective Storage Management

- Separation of activities, for example separate drop off, processing and storage areas by distance, containment walls etc.
- Good layout of site arrange your site to consider spontaneous combustion and the flammable nature of your waste types.

### Monitoring Hazards

- Security systems such as CCTV to monitor sites for illegal dumping, vandalism, other potential sources of ignition.
- Early detection devices such as thermal probes to monitor temperature of CRWM storage; and outdoor thermal detection, video smoke detection and flame detection to detect fire in the early stages.

### Site Arrangements

- Separation of combustible non-waste materials from CRWM storage through removing gas cylinders, dangerous goods, electrical devices, batteries, flammable substances, etc. from areas where CRWM is stored.
- Quarantine areas for hazardous waste and hot loads through separating combustible hazardous wastes from where CRWM is stored and having designated areas for depositing and controlling hot loads.
- Adequate and maintained security fencing to restrict unauthorized access.

### Policies and Procedures

- Good housekeeping and equipment maintenance through a regular maintenance program and records.
- Permits and policies, for example hot works in place and tilted (including exclusion zones).
- Site walks conducted regularly including inspections of equipment/vehicles.
- Record keeping of staff training, staff roles, and maintenance of vehicles and routine service of fire protection equipment and systems.
- Routine service of fire protection equipment is carried out to the latest edition of AS 1851 by individuals considered competent by VBA ecognized qualifications or industry accreditation schemes such as Fire Protection Accreditation Scheme. Critical defects are to be rectified within 30 days.
- Review and make updates to safety documents in a timely manner/when introducing new equipment or tasks to the site/in the event of a fire.
- Develop and enforce a smoking policy that prevents smoking on site or includes no-smoking zones near combustible materials.

### Effective Storage Management

- Using bunker fire walls or separation/free air gaps to create barriers between piles.
- Manage pile size and arrangement of waste types
- Interlace baled material for stability of stacks

### Fire Protection Systems

- Fire protection systems (for example, hydrants, fire water monitors, fire sprinklers) provided to respond to hazards on the site (compliant with applicable standards and appropriate to the potential fire hazard).
- Water supply (for example, dams, reticulated or tanks) provided onsite. Where a reticulated supply is not available, cannot meet the requirements of AS 2419.1, or is the worst credible fire scenario, it is important to provide a static water supply that is fit for purpose. Water for fire systems should be potable or Class A recycled water and salt-free.

- Fire warning systems (for example, bells, alarms, alarm signalling equipment) that can be automatically or manually triggered by the fire detection and protection systems, providing both local alarms and automatic notification to the CFA or FRV of the fire.
- First aid firefighting equipment (for example, fire extinguishers, fire hose reels) that is both accessible and in effective working order.
- Firefighting support equipment (for example, excavators) that is stored on site and fitted with AS 5062-compliant vehicle fire suppression systems to separate burning materials or build containment ponds.
- Automatic fire deluge systems in bunkered storage within the site.

#### **Fire Water Containment**

- Liquid run-off management including bunding, drainage basins/catchment pits, contingency plans to divert from storm drains to sewers, use of booms, extinguishing fires with sand instead of foam/water, eductor pumps to pump firewater off site for disposal, and/or monitoring of waterways.

## **Australia (Federal) Tyre Storage Regulations**

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### **Transport**

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Nationally, tyres are listed as a 'controlled waste' in List 1 of Schedule A of the National Environmental Protection (Movement of Controlled Waste between States and Territories) Measure 2004 (Controlled Waste NEPM). The NEPM has established a national system to track the transport movements of controlled waste between States and Territories and developed nationally recognised licences for interstate transporters. While, the interstate transport of tyres is regulated via this legislation, there is no federal control over the storage of tyres.

### **Storage**

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While there are no federal requirements on storage of tyres, where tyres are stored indoors, buildings must be constructed in compliance with Part E of Volume 1 of the National Construction Code (Building Code of Australia)<sup>1</sup>, which lists requirements and specifications for firefighting equipment and smoke hazard management, and tyre storage facilities must comply specifically with Clause E1.10 and E2.3. Clause E1.10.

State jurisdictions may specify separate requirements (under state-specific guidelines or waste management regulation) that must be complied with. For example, in Western Australia clearly specifies pile sizes for indoor and outdoor provided in Guidance Note GN02: Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres.

### **Work Health and Safety (WHS)**

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In addition, Australian businesses have obligations under the harmonised Work Health and Safety (WHS) framework in Australia, including the Model WHS Regulations (1 January 2021). However, there are no specific requirements under the WHS framework for tyre storage facilities.

<sup>1</sup> Australian Building Codes Board (2015) *National Construction Code Volume One, Building Code of Australia, Class 2 to Class 9 Buildings*.