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THOMPSONS OF PRUDHOE LTD

LOW PRUDHOE WTS PERMIT VARIATION (EPR/RP3898ZV)

OPERATING TECHNIQUES ADDENDUM

NOVEMBER 2025

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NOVEMBER 2025

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NT16466-001	Permit Boundary	1:1000@A3
LP-02 003	Site Layout	AS SHOWN
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1 INTRODUCTION

1.1.1 Wardell Armstrong LLP has been commissioned by Thompsons of Prudhoe (ToP) Ltd to prepare an application to vary the environmental permit for its Low Prudhoe Waste Transfer Station (reference EPR/RP3898ZV, EAWML64001) in Northumberland.

1.1.2 The site will operate an Environmental Management System (EMS) in accordance with the standard set out in the Environment Agency Guidance, as set out in Section 2. The EMS sets out the operator's measures in place to minimise the risk of environmental harm from site activities and facilitate continuous improvement.

1.1.3 The permit allows for the acceptance a range of non-hazardous industrial and commercial wastes, as well as cement-bonded asbestos. The variation will extend the existing boundary to the east, allowing additional area for the storage of inert waste for which the throughput will be increased to 150,000 tonnes. Additionally, the permit will be varied to allow for the acceptance of bagged or securely wrapped fibrous asbestos to the transfer station. Section 3 provides additional activities undertaken on site.

1.1.4 The acceptance of asbestos and storage of waste will be undertaken in accordance with Environment Agency guidance and legislation, using appropriate measures. Section 4 summarises the environmental controls will be in place to minimise the risk to human health and the environment. Section 5 provides an overview of the monitoring and reporting procedures in place to ensure environmental controls remain effective.

2 SITE MANAGEMENT

2.1.1 The site will continue to operate under ToP Ltd's Environmental Management System, developed in accordance with the standard set out in the Environment Agency Guidance, "Develop a Management System: Environmental Permits".

2.1.2 Written procedures will be in place to ensure compliance with this Operating Techniques Addendum document and relevant legislation and guidance, including measures taken to minimise the risk of environmental harm from site activities.

2.1.3 All site operatives will be trained and made familiar with the requirements of the environmental permit, their responsibilities and any written procedures relevant to their role.

2.1.4 An induction will be provided for contractors on site, ensuring that they are aware of any site-specific issues and are able to carry out their duties without harm to the environment.

3 SITE ACTIVITIES

3.1 Activity Description

3.1.1 The site operates as a waste transfer station accepting a range of commercial and industrial waste types. The permit allows for the acceptance of inert wastes, scrap metal, degradable waste (from commercial and industrial sources) construction and demolition wastes, and cement bound asbestos only. A permit boundary plan is provided as Drawing NT16466-001 and a layout plan is provided as Drawing LP-02 003.

3.2 Storage of Inert Wastes

3.2.1 The variation will extend the existing boundary to the east, allowing additional area for the storage of waste. Storage of waste in external areas will be limited to inert wastes only (e.g. inert soils, concrete, bricks, tiles etc.).

3.2.2 Wastes will be stored in four external bays in the northeast extent of the site. The bays have dimensions of approximately 17m by 12m allowing for a storage capacity of 500m^3 each.

3.2.3 The bays will benefit from impermeable surfacing that will feed into the site's existing sealed ACO drainage system linked to the WTS building, which drains to a below ground leachate collection tank. The tank is periodically emptied by tanker to maintain its capacity. Drawing LP-01 002 provides a drainage layout for the site.

3.2.4 To facilitate the acceptance of additional material, ToP Ltd propose to increase the throughput of inert waste to 150,000 tonnes.

3.3 Acceptance of Bagged Fibrous Asbestos

3.3.1 Cement bound asbestos is the only hazardous waste type permitted to be accepted at the site under waste code 17 06 05* *construction materials containing asbestos*, limited to 3,120 tonnes per annum. The daily quantity of asbestos waste accepted per day is limited to 10 tonnes and the maximum storage capacity is likewise limited to 10 tonnes.

3.3.2 In addition to cement-bonded asbestos, ToP Ltd propose to vary the permit to allow for the acceptance of fibrous asbestos onto the site. To facilitate acceptance of fibrous asbestos, one additional waste code is proposed to be added onto the list of permitted waste types (Table 1.1 of appendix A of the permit), that is:

- 17 06 01* *Insulation materials containing asbestos*.

3.3.3 Fibrous asbestos will only be accepted if it is appropriately double-bagged (or securely double-wrapped in heavy gauge polythene, where necessary) ensuring it can be handled and transported safely. All bagged fibrous asbestos will be stored in a dedicated secure lockable container, consisting of a 40 yd enclosed asbestos skip or similarly appropriate containment skip.

3.3.4 There will be no treatment of asbestos wastes on site and the material will remain securely stored and bagged within the container until it is removed from site for disposal at an appropriately permitted facility.

3.3.5 The daily acceptance limit and storage limit will remain at 10 tonnes of total asbestos.

3.4 Asbestos Waste Storage and Dispatch

3.4.1 Bagged fibrous asbestos will be stored in a dedicated sealed lockable container. This will consist of a 40 yd enclosed asbestos skip or similarly appropriate containment skip.

3.4.2 Waste asbestos will be bulked in the storage container. Asbestos waste will be periodically dispatched off site by a registered waste carrier to an appropriately permitted facility in accordance with the Waste (England and Wales) Regulations 2011.

3.4.3 The maximum quantity of asbestos waste (including both fibrous and cement-bonded) stored at the site at any time will not exceed 10 tonnes.

4 WASTE TYPES

4.1.1 The tables below set out the waste types that will be subject to the different activities on site. Table 4.1 lists the hazardous waste which will be stored in a fully contained lockable container. Table 4.2 lists the non hazardous waste stored on site and indicates which wastes may be stored inside or outside and those that will only be stored inside the waste transfer building. Table 4.3 lists those wastes that may be treated during campaigns of crushing on site to produce secondary aggregate.

Table 4.1 Storage of Hazardous Waste (<50 tonnes at any one time)	
Waste Code	**Waste Description**
17	***Construction and Demolition Waste***
17 06	*insulation materials and asbestos-containing construction materials*
17 06 01*	Insulation materials containing asbestos.
17 06 05*	construction materials containing asbestos

Table 4.2 Storage of Non Hazardous Waste		
Waste Code	**Waste Description**	**Inside Building Only**
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 17	Ferrous metal	Yes
16 01 18	Non-ferrous metal	Yes

Table 4.2 Storage of Non Hazardous Waste		
Waste Code	**Waste Description**	**Inside Building Only**
17	***Construction and Demolition Waste***	
17 01	*17 01 concrete, bricks, tiles and ceramics*	
17 01 01	concrete	
17 01 02	bricks	
17 01 03	tiles and ceramics	
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	
17 02	*wood, glass and plastic*	
17 02 01	wood	Yes
17 02 02	glass	
17 02 03	Plastic	Yes
17 03	*bituminous mixtures, coal tar and tarred products*	
17 03 02	bituminous mixtures other than those mentioned in 17 03 01	
17 04	*metals (including their alloys)*	
17 04 07	Mixed metals	
17 04 11	Cable other than those mentioned in 17 04 10	
17 05	*soil (including excavated soil from contaminated sites), stones and dredging spoil*	
17 05 04	soil and stones other than those mentioned in 17 05 03	
20	***Municipal Waste***	
20 01	*Separately collected fractions*	

Table 4.2 Storage of Non Hazardous Waste		
Waste Code	**Waste Description**	**Inside Building Only**
20 01 01	paper and cardboard	Yes
20 01 02	glass	Yes
20 01 10	clothes	Yes
20 01 11	textiles	Yes
20 01 38	wood	Yes
20 01 39	plastic	Yes
20 01 40	metals	Yes
20 02	*Garden and Park Wastes*	
20 02 01	biodegradable waste	Yes
20 02 02	soil and stones	
20 02 03	Other non biodegradable waste	
20 03	*Other Municipal Wastes*	
20 03 03	street cleaning residues	

Table 4.3 Wastes for Crushing	
Waste Code	**Waste Description**
17	***Construction and Demolition Waste***
17 01	*17 01 concrete, bricks, tiles and ceramics*
17 01 01	concrete

Table 4.3 Wastes for Crushing	
Waste Code	**Waste Description**
17 01 02	bricks
17 01 03	tiles and ceramics
17 01 07	mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 02	*wood, glass and plastic*
17 02 02	glass
17 03	*bituminous mixtures, coal tar and tarred products*
17 03 02	bituminous mixtures other than those mentioned in 17 03 01
17 05	*soil (including excavated soil from contaminated sites), stones and dredging spoil*
17 05 04	soil and stones other than those mentioned in 17 05 03

5 WASTE ACCEPTANCE PROCEDURES

5.1.1 Inert waste is already accepted on the site, and the new asbestos waste type is very similar to that already accepted. Waste Pre-Acceptance and Acceptance will therefore continue in line with the existing procedures. During the pre-acceptance stage, any specific handling or storage requirement for individual wastes will be established, including for asbestos waste. Pre-acceptance procedures will also support the identification of inert waste streams, ensuring that only permitted wastes are accepted at the site and that only appropriate inert waste is accepted for external storage and treatment. Materials from potentially contaminated sources must be characterised with supporting analysis to demonstrate that the material is non hazardous or inert.

5.1.2 On arrival at the site all waste will inspected at the weighbridge. The transfer note (or consignment note for hazardous asbestos waste) will be checked against the pre-acceptance information and, where it is possible, a visual inspection of the waste will

be made. The weighbridge operator will direct the load to the appropriate unloading point. Only inert waste loads will be allowed to tip in external bay areas.

5.1.3 Fibrous asbestos will only be accepted at the site if it is appropriately double bagged or securely wrapped and sealed. Standard practice is for the material to be bagged in a red inner bag with asbestos warnings, and a clear outer bag. Bags must not be overfilled and large pieces should not be broken up, in which case asbestos containing material may be double wrapped in suitable polythene sheeting (1000-gauge) with asbestos warnings.

5.1.4 The majority of asbestos received on Site is expected to be from Thompsons of Prudhoe's sister Site, therefore allowing full control over storage and containment measures for the material prior to being received.

5.1.5 The maximum amount of asbestos containing materials in total received at the site will not exceed 10 tonnes per day. A tracking system will be in place to record the volume of asbestos being received and stored on site, which will be used to check available capacity on site prior to accepting more asbestos.

6 ENVIRONMENTAL CONTROL MEASURES

6.1 General

6.1.1 The main risks from the site activities will be emissions to air from the storage of inert waste in external areas and the acceptance of fibrous asbestos. Strict control measures will be in place, as described below, to ensure that emissions to air are not allowed to occur.

6.1.2 There is not considered to be any additional risk of fire, litter or odour from the new activities, therefore control of these emissions will therefore continue in line with the existing procedures.

6.2 Emissions to Air

6.2.1 A Dust Management Plan (DMP) has been provided with the permit variation application, describing the potential sources of dust, receptors and control measures that will be in place to prevent polluting emissions beyond the permit boundary.

6.2.2 External storage of inert waste will not include any waste types that are likely to cause excessive dust. Waste will be stockpiled in designated bays not exceeding the height or footprint of the bay walls to ensure protection from wind-whipping and entrainment of fine particles into the air.

6.2.3 The bays are sited to provide appropriate shelter to the wastes and at a distance from nearby receptors to prevent emissions beyond the site boundary any nuisance from airborne emissions.

6.2.4 A water bowser with spray bar and high-pressure water gun will be employed as necessary (such as during dry or windy conditions, as determined by the site manager) to dampen stockpiles or site roads to prevent dust emissions beyond the site boundary.

6.2.5 Risk of exposure to asbestos will be maintained at very low levels throughout the operation by ensuring that all fibrous asbestos containing materials will be received double bagged or securely double wrapped and sealed.

6.2.6 Asbestos being received to Low Prudhoe will mostly be received from a sister company of Thompsons of Prudhoe, allowing control over the containment measures prior to the material being received onto site. In the event that material is received that is not double-bagged it will not be accepted, however there will be a supply of spare

asbestos bags/wrap on site, which will be used to double-bag bags that are overfilled and not fully sealed, or are torn or otherwise defective, allowing them to be accepted.

6.2.7 Handling of asbestos waste will be minimised as far as possible by ensuring that material is placed directly into the sealed containers following acceptance on site. Asbestos will be contained in secure lidded containers.

6.2.8 Ancillary activities such as vehicle movements may cause emissions of dust. Site roads and operational areas are subject to good housekeeping to keep surfaces free of any build-up of mud or dust that may cause emissions beyond the permit boundary.

6.2.9 The site operates a drive-in wheel bath and portable power-wash system, which will utilised as necessary to clean the wheels and chassis of vehicle to prevent muddy emissions onto public roads. A road sweeper is utilised as necessary to keep hard surfaced roads and working areas clean and free of mud and debris, and its use is recorded in the site diary.

6.3 Emissions to Land and Water

6.3.1 There will be no point source emissions to land or surface water resulting from the variation to the site activities.

6.3.2 The WTS building interior and the external waste storage bays have impermeable concrete pavement which falls to an ACO drain running along the foot of the bays and the entrance to the building, draining to a below ground leachate collection tank. The tank is periodically emptied by tanker to maintain its capacity.

6.3.3 The external waste area is surfaced with permeable hardcore. Only inert materials (soils, stones, concrete, glass and tiles) may be stored in external areas, therefore the risk of contamination of surface water or groundwater is negligible.

6.3.4 Crushing may take place on an area with hardcore surfacing. This is not expected to cause pollution as waste will only be in this area for a short period and good waste acceptance procedures will ensure that only inert waste is treated via the crusher.

6.3.5 Site buildings, drainage and infrastructure is subject to good practice maintenance and inspected at least once a month. Any issues are investigated immediately and remedial actions taken as necessary. All inspections and actions are recorded in the site diary.

6.3.6 Asbestos material is bagged, dry and will be stored within an enclosed asbestos skip only, which will not allow the ingress of rain or escape of run-off.

6.4 Noise

6.4.1 The site already operates as a waste site and is located on an established industrial estate, and the proposed changes are not expected to increase peak levels of noise.

6.4.2 All plant and equipment will be maintained in accordance with the manufacturer's recommendations to ensure that it functions correctly and without excessive noise.

6.4.3 Engines on delivery vehicles will be switched off where appropriate to prevent excessive idling.

6.4.4 A noise assessment and noise management plan have been submitted with the application.

6.4.5 Noise levels will be taken into consideration during the purchase of new equipment, with quieter models being utilised where this will result in equal or better performance and is economically viable.

6.5 Other Emissions

6.5.1 Litter is not expected from the acceptance and storage of bagged fibrous asbestos or storage of inert waste.

6.5.2 Any waste with the potential to generate litter (e.g. plastics, paper, textiles) must be stored within the WTS building.

6.5.3 Asbestos bags or wrapping will remain sealed at all times with no exceptions. Routine daily inspections will identify any litter that is present, and the resulting litter will be collected and disposed of appropriately if required.

6.5.4 The inert and asbestos waste is not considered odorous and there will be no odour resulting from acceptance of the materials therefore there is a very low risk of odour from the new activity.

6.5.5 Inert waste will not include combustible materials and asbestos waste will be accepted in very low volumes and stored in a lockable container with very little combustible material, therefore there is considered no additional risk of fire from the varied activities.

6.5.6 Litter inspections will be carried out on a regular basis and if, at any time, loose waste or litter is identified on-site or blown beyond the site boundary it shall be collected immediately.

6.6 Security

6.6.1 The site has security fencing to ensure that no unauthorised individuals can gain access to the site or access to the plant and stockpiled waste. Outside of operational hours, the site is securely locked to prevent unauthorised access.

6.6.2 All bagged or wrapped asbestos containing waste will be stored within an enclosed locked container with no access to the bags.

6.6.3 Inert waste is not combustible therefore there is not at risk from arson.

6.7 Abnormal Events

6.7.1 In the case of abnormal event, such as plant malfunction or breakdown which may lead to abnormal emissions, strict procedures will be followed to prevent environmental pollution.

6.7.2 If equipment becomes damaged it will stop being used until remedial action has been carried out. This will include stopping the crusher where the spray bars are not operating.

6.7.3 Spill kits will be available on site to clean any spills.

6.7.4 No asbestos will be accepted unless there is a skip with a lockable lid available with sufficient capacity to store the asbestos.

6.7.5 The plant will be operated and maintained (including preventative maintenance) in line with the manufacturer's recommendations to prevent abnormal operation.

6.7.6 The cause of the abnormal emission will be investigated, and remedial action will be taken immediately. If necessary, as determined by the site manager, the operation will be adjusted or stopped to minimise identified emissions. Suppression methods, such as dampening with water will be used as appropriate. The event and actions taken to remediate the emission will be promptly recorded in the site diary.

6.7.7 Should any other abnormalities, such as ineffective containment or unexpected emissions be observed from asbestos waste, the material will be dampened immediately, and the site manager informed. The cause will be investigated and acceptance of asbestos will cease whilst the matter is resolved. The incident and any remedial action taken will be recorded in the site diary.

7 MONITORING AND REPORTING

7.1.1 The Site is operated in accordance with stringent written procedures, benefitting from appropriate infrastructure and drainage to effectively prevent and control emissions resulting from site activities. Environmental control measures to prevent pollution from the fibrous asbestos and external storage of inert waste will be incorporated into the existing procedures.

7.1.2 An Environmental and Habitats Risk Assessment has been provided with the variation application, detailing the source, pathway and receptors of environmental risks resulting from site operations and the necessary appropriate measures to prevent or minimise resulting impacts.

7.1.3 The Site is inspected daily to identify any issues of concern, including dust, odour and litter and at least monthly to assess the conditions of site infrastructure such as roads, drainage, containers (including the asbestos skip) and buildings. Inspections are recorded, taking care to note any issues and remedial actions undertaken.

7.1.4 During transport and handling of materials, site operatives are trained to monitor for particulate emissions. If emissions are detected, this will be recorded and steps will be taken to reduce any further risk of visible dust and ensure containment integrity. Any emissions will be dealt with immediately and the incident recorded to prevent future emissions.

7.1.5 Any issues noted will be dealt with by the site manager and the appropriate level of remedial action taken, with the detail of the action recorded. Records of all monitoring inspections will be made in the site diary.

7.2 Complaints

7.2.1 Records of all complaints received will be made immediately upon their receipt. All complaints will be investigated, with appropriate remedial action being put in place where required.

7.2.2 A record will be kept detailing the nature of the complaint, potential causes, findings of the investigation and the actions taken to prevent reoccurrence.

7.2.3 Any relevant findings and actions taken will be fed back to the complainant, except where they have asked otherwise or requested to remain anonymous.

7.3 Environmental Management System and Record Keeping

7.3.1 ToP Ltd operate an Environmental Management System developed in accordance with the Environment Agency's Guidance *Develop a management system: environmental permit*s. The EMS covers:

- Quality Management;
- Environmental Management;
- Health and Safety Management;
- Training;
- Maintenance; and
- Environmental permit and other environmental legislation and requirements.

7.3.2 Site operatives are trained to follow the measures set out in the EMS and to understand their responsibilities under the Environmental Permit. Training will be provided to operatives in proper waste-acceptance, monitoring and recording relating to the new site activities.

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