

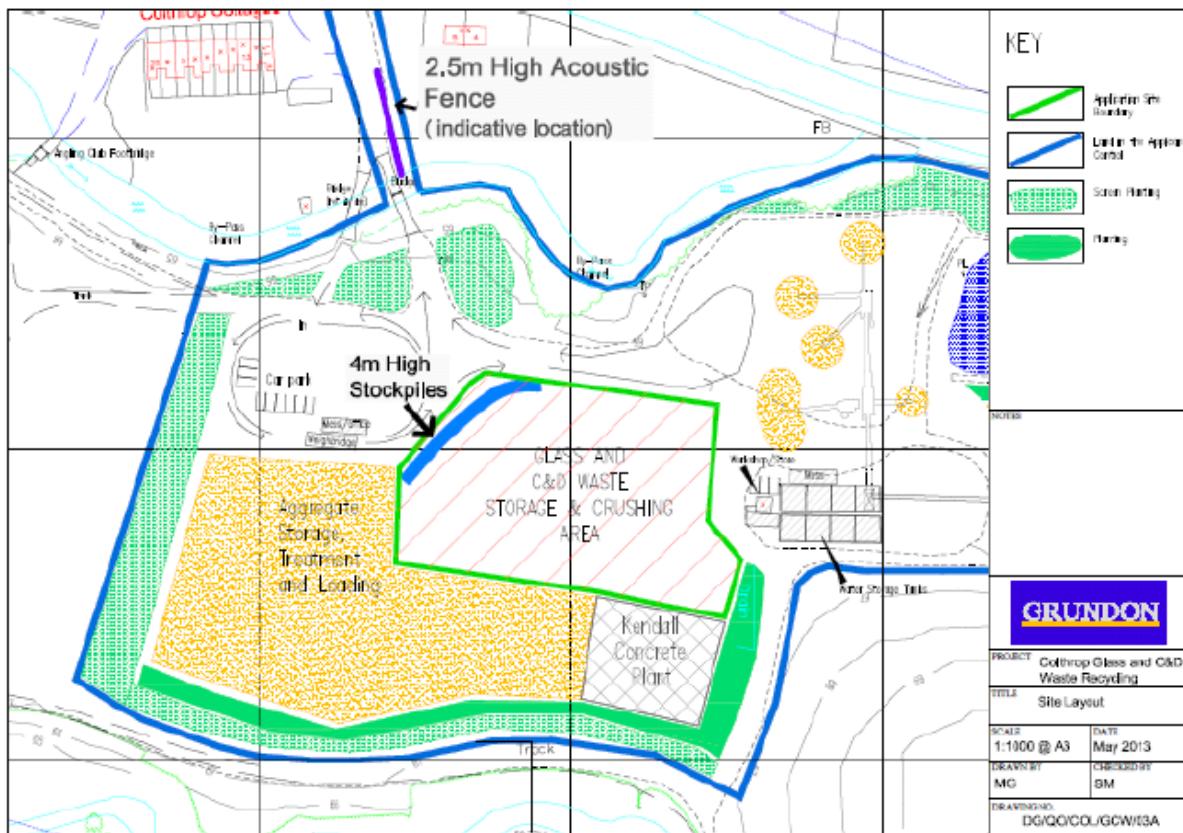
To satisfy the requirement for a Site Condition Report, the application includes a completed H5 form. For Sections 1 to 3 this includes information presented in July 2011 for the original waste recovery EP application.

Sections 4 and 7 have been completed to reflect the operations since the EP was granted (in February 2014) and this document provides additional detail as required by those sections.

## 1 Changes to the Activity

The EP for the Kennethholme Quarry Recycling Facility was originally granted on 18 February 2014 (EPR/BB3013MJ). It is a Tier 2 bespoke permit for the treatment of inert waste to produce soil, substitutes and aggregate up to 15,000 tonnes per year. The EP boundary is shown in Figure 1 (Schedule 7 of the EP).

Figure 1: 2014 EP Boundary



The EP has remained unchanged since 2014, and activities remain in line with the EP. The 2026 variation (application dated 2023) seeks to make the following changes:

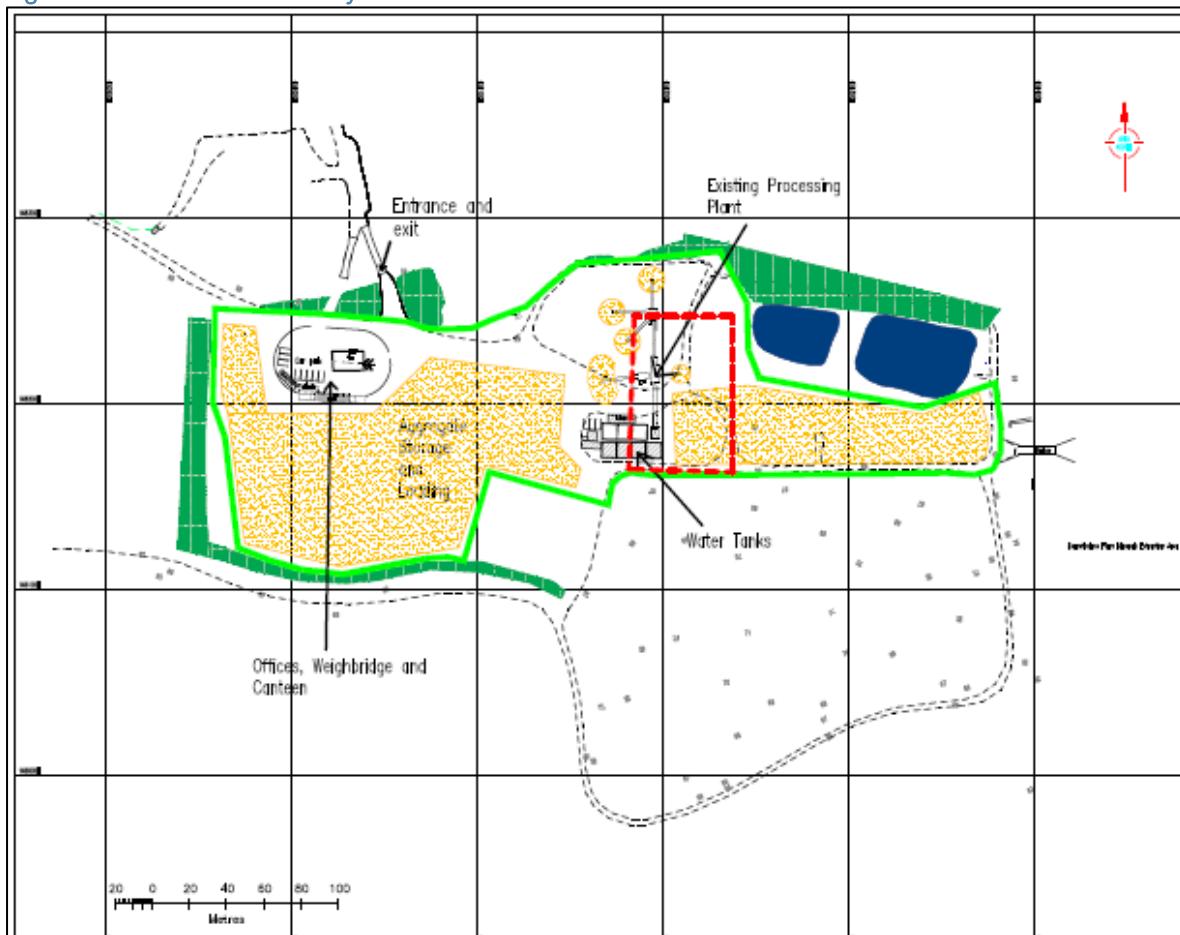
- Increase the throughput of the site, up to 120,000 tonnes per year. The increased treatment capacity does not change the status of the existing Waste Operation as it is physico-chemical treatment of non-hazardous waste for the purposes of recovery (this is not covered by either Section 5.4 Part A(1)(a)(ii) or Section 5.4 Part A(1)(b)). This increase allows for the addition of the processing of recycled aggregates through the existing permitted wash plant.
- Add seven new waste codes to the existing permit (see details in Section 2.3.1 below).
- Add a new water treatment plant that is compatible with the existing washing and screening plant and therefore allows the processing of recycled aggregates through the existing wash plant. This treatment plant will be a physical process (either a silt press or centrifuge). As for

the primary treatment process above, this is also a Waste Operation as it is physico-chemical treatment of non-hazardous waste for the purposes of recovery.

The existing EP boundary is limited to a small area of the land ownership, in the centre portion of the wider site boundary. The addition of the water treatment plant for the wash plant wash waters, and the need for increased storage for incoming (untreated) wastes (up to 10,000 tonnes at any one time), requires the EP boundary to be amended.

The revised/increased EP boundary is shown on Drawing 060/P/003F submitted with the variation application in Appendix 5 and is represented in Figure 2 below by the green line.

**Figure 2: Revised EP Boundary**



## 2 Measures Taken to Protect Land

The permitted activities are covered under a Tier 2 bespoke permit for the treatment of inert waste to produce soil, substitutes and aggregate up to 15,000 tonnes per year. The inherent nature of the activities are low risk in terms of potential pollution, based on the inert classification of the waste materials, and the lack of chemicals/raw materials being used. As detailed in Section 5 of this document, the only material held on site that presents any pollution risk is diesel.

A number of checks are made, and records kept for the site, including:

- Daily inspection (site diary). This covers the wider site but has a section specific to the recovery operation and includes the following checks:
  - Whether roads are being kept clean and in good order
  - Whether wheel cleaning devices are operational

- Whether any odour is detectable
- Whether there are any vermin problems
- Whether there is any windblown litter on or off site
- Whether there is any evidence of unauthorised tipping or any fires on site
- Whether any samples have been taken for compliance testing either customer or site
- Whether any loads have been received containing non-permitted material (and whether they have been reloaded/quarantined)
- How many loads have been tipped that day
- Whether there is a skip available and if it needs servicing
- Whether security cameras are working and boundary security is in tact
- Whether fuel storage bunds are empty.

➤ Near miss log. This is a Grundon wide log that covers all sites. It picks up details of the hazard (department, location, date, time), whether there was potential for injury/damage/pollution and tracks actions taken to close out the issues (preventative or reactive). It is noted that the records for 2024 and 2025 show no near misses recorded for the Kennethholme site.

➤ Safety Observation Checks. These are spot checks, carried out by Top Management across the Grundon portfolio. For the Kennethholme site, these were undertaken in 2014, 2015, 2016 and 2019. Each check includes an environmental section which covers chemical storage, spillage kits, waste management, water management, energy management, lighting, housekeeping, cleanliness, pest control, security, dust and access/egress. No issues relating to pollution control or incidents with the potential to cause pollution have been raised in any of these. Two older ones do recognise improvements made to reduce pollution risk, including the move to using biodegradable hydraulic oil in specific plant, and moving the maintenance area (outside of this EP boundary) away from waterbodies.

➤ Internal audits. These are carried out annually. The report for 2024 raised two non-conformances and six improvement opportunities; none related to pollution control or management of environmental impact. The report for 2025 raised four non-conformances and four improvement opportunities; as for 2024, none related to pollution control or management of environmental impact.

➤ SHEQ Advisor Inspections. Whilst these focus on health and safety, there is some consideration of environmental issues. These are carried out monthly.

The site is also subject to EA inspection, and any issues are raised via compliance assessment report (CAR) forms. The two most recent are summarised below.

➤ Inspection dated 10/10/2018 (ref. 401090/0318310). One non-compliance was raised, related to the acceptance of soils that were mistakenly believed to be on the EP (in fact the variation notice which included this waste stream did not apply to the Kennethholme recovery facility). The soil heap was subsequently removed from site in accordance with the deadline in the CAR.

➤ Inspection dated 02/12/2019 (ref. 401090/0349259). No non-compliances were found.

➤ Inspection dated 15/10/2020 (ref. 401090/0376443). No non-compliances were found. The report notes good segregation of product and different waste types.

➤ Inspection dated 26/10/2021 (ref. 401090/0406687). No non-compliances were found. The report notes that the quality of hardcore was good, and that sampling of the treated and untreated soil is being undertaken regularly.

➤ Inspection dated 04/08/2022 (ref. 401090/0434301). No non-compliances were found. The report specified that there was no evidence of excessive odour, noise, or dust at the site.

➤ Inspection dated 11/06/2024 (ref. 401090/0506592). No non-compliances were found. A note was included regarding the need to provide a designated quarantine area for non-conforming waste. Whilst the expectation is that non-conforming waste is unlikely (due to rigorous waste acceptance procedures) a quarantine area is required. This is recorded as having been followed up, although there is no subsequent CAR form on record to confirm this in writing. Figures 3 and 4 below are recent photographs of the area, showing the signage and the use of a skip to contain any non-conforming materials.

Figure 3: Quarantine Area



Figure 4: Quarantine Area



### 3 Pollution Incidents that may have had an Impact on Land, and their Remediation

Details of checks carried out at site are detailed in Section 2 of this report. These, and the CAR forms, confirm the lack of any pollution incidents that could have had an impact on land.

### 4 Soil Gas and Water Quality Monitoring

No monitoring has been, or is, carried out at the site. The nature of the permitted operations is low in risk for pollution potential as the waste materials are inert, and the processing does not require the use of any polluting substances.

### 5 Hazardous Substances Assessment

The EA H5 guidance is currently being amended and is under consultation. One of the changes is to clarify the requirement to complete a Stage 1 – 3 assessment if the proposal is to use, produce or release any hazardous substances during the life of the EP. This serves to identify if there is a risk of pollution to soil and groundwater. This is provided here.

#### Stage 1 – Identification of Hazardous Substances

The site will not accept any hazardous wastes. Inert wastes will be processed through the existing processing plant. A new wash plant (and water treatment plant) will enable the recycling of water waters. The WTP is a physical process; a filter press. The 'effluent' is therefore reused in the process in a closed loop system, rather than needing to be discharged. A filter cake will be produced by the WTP. Diesel is stored in a double skinned tank to the northwest of the processing area. All substances are listed in Table 1.

**Table 1: Hazardous Substances**

Substance	Description	Hazardous / Non-hazardous
Incoming wastes	Glass and C&D waste for stockpiling, crushing and screening: 01 04 08 & 09; 10 11 12; 10 12 08; 10 13 14; 15 01 07; 17 01 01, 02, 03, 07; 17 02 02; 19 12 05, 09, 12; 20 01 02; and 20 02 02 Inert waste for stockpiling, screening and washing: 17 05 04, 06, 08; 17 09 04; 19 08 01, 02; and 20 02 02	Non-Hazardous
Flopam FO 4440 SSH	Flocculent used in the water treatment plant: Granular white solid, soluble in water. Non-odorous, pH 2.5 – 4.5 @ 5 g/l. Not combustible, explosive or oxidising.	Non-Hazardous
Process effluent	Silt laden water from the wash plant. This is processed through the filter press WTP and recirculated back to the wash plant after treatment. There is no discharge of process effluent to sewer or otherwise.	Non-hazardous
Filter cake	Up to 40% dry solids cake produced by the filter press WTP. This itself can be considered a product – for use as a secondary aggregate / soil substitute	Non-hazardous
Diesel	Fuel used for site plant: Flammable liquid – H226 – flammable liquid/vapour Aspiration toxicant – H304, H332 Skin irritant – H315 Carcinogenic - H351	Hazardous

## **Stage 2 – Identification of Relevant Hazardous Substances (RHS)**

The only substance identified as hazardous in Table 1 above has been assessed for potential pollution risk i.e. whether it could cause soil and groundwater pollution, see Table 2.

Table 2: RHS Assessment

Description	Solubility	Toxicity	Mobility	Persistence	Biodegradability	Physical state	RHS?
Diesel – fuel for on-site mobile plant	Immiscible in water	Acute inhalation toxicity; specific target organ toxicity (thymus, liver and bone marrow); very toxic to aquatic life with long-lasting effects	Floats on water, partly evaporates from water or soil surfaces. Large volumes may penetrate soil and contaminate groundwater	N/A	Considered biodegradable. Hydrocarbons may be degraded under aerobic conditions into metabolites that are less toxic and less bioaccumulative	Liquid (flammable liquid and vapour)	Yes

## **Stage 3 – Assessment of Site Specific Pollution Possibility**

The substance in Table 2 has been identified as being a relevant hazardous substance (RHS). Stage 3 provides an assessment of the potential pollution risk to soil and groundwater for this (and the activities it is used for).

This follows the EA's source pathway receptor model and is presented in Table 3.

Table 3: Risk Assessment

Source	Pathway	Receptor	Harm	Control Measures	Likelihood of Exposure	Consequence	Magnitude of Risk
Diesel	Spillages - direct run-off from site and via surface water drains and ground	Via soil, groundwater to local human population and ecological / habitat receptors	Harm to human health – skin irritant, inhalation causing organ damage, cancer causing Harm to aquatic life – toxic to fish, invertebrates, algae	Diesel is stored to the northwest of the processing area, in a 17,880 litre double skinned tank. It is outside (ventilated), away from heat and ignition sources. No smoking is permitted on site. The tank is kept locked when not in use, and subject to regular inspection to ensure continued integrity. Refuelling procedures followed, by trained staff only. Fill point is bunded. SDS and COSHH assessment retained on site and reviewed regularly. Spillage procedures and kits are in place.	Very Low	Medium	Low

The assessment above is considered to be a comprehensive review of the hazardous substances present on site for the permitted activities.

It concludes that there are no risks from the one relevant hazardous substance that would require the collection of baseline reference data for soil and groundwater.

In support of this assessment, the following documents are available for the site (and have for the majority been submitted in pursuance of the 2025 permit application):

- EMS documents (certified company-wide system) including EMS Summary (ref. Appendix 4 – GR\_2021.02\_v2) and ISO 14001:2015 Certificate
- Site Layout Plan (ref. DG/QO/COL/CON36/01)
- Processing Plant Layout (ref. DG/QO/COL/CON36/02A)
- SDS (ref. Appendix 8)
- COSSH assessments