UK Remediation Ltd

Environmental Management System: A Summary

Exeter Fixed Soil Treatment Facility

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Author:	Ed Bailey
(Signature):	
Project Manager/Director:	Simon Hockin
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1. INTRODUCTION

In order to minimise the environmental impact of the company's activities, UK Remediation Ltd (UKRL) operates an Environmental Management System (EMS), which is compliant with the standard BS8555: 2016. The EMS forms part of the UKRL ISO compliance accreditations (9001, 14001 and 45001, see **Appendix A**). UK Remediation has been ISO compliant since 2015 and continues in compliance.

The Exeter Fixed Soil Treatment Facility (FSTF) adheres to the protocols of this system of work.

This document outlines procedures, products and individual responsibilities within the EMS and how these relate to UKRL's activities at the Exeter FSTF.

2. STRUCTURE, CONTENT, IMPLEMENTATION AND OPERATION OF THE EMS

A short summary of the main elements that comprise the UKRL's company-wide EMS is presented in **Appendix A** (ref. Structure and Function of the UKRL EMS). Those elements that relate to the Exeter FSTF are applied in accordance with the requirements of the EMS.

This includes monitoring and recording of the key parameters of the identified environmental aspects and collation for regular review to track performance and compliance with environmental legislation and best practice.

Incidences of non-conformance or potential non-conformance will be documented via site and operations audits undertaken by senior management and review of incident and near-miss reports.

Management of change for continuous improvement will be implemented under continuous site management and senior company management review.

3. EMS MANAGEMENT STRUCTURE TO BE APPLIED AT EXETER FSTF

A project management structure organogram for the Exeter facility is presented in **Appendix B**.

The Management of the facility will be under the direct supervision of the company HSE Director, Richard Dalton (Managing Director and WAMITAB holder) with project support from the Commercial and Technical Directors. Day-to-Day operations will be under the management of the Site Manager, with independent HSE consultants Greenlight providing arms-length audit and review.

This management structure will comprise the management review panel that review compliance and any incident management to set out measures for continuous improvements as per the ISO protocols. An ISO audit is carried out annually.

4. AUDIT TRAIL, DOCUMENT RECORDS AND OUTPUT COMPLIANCE

A summary of the EMS documentation relevant to the Exeter FSTF can be viewed in **Appendix C** - EMS Document Map 2025. This includes daily site records of incoming and outgoing materials, treatment agents applied, materials movements etc., on-site monitoring and measurement of emissions to environmental media, operational control and risk management. In addition, the training and experience of team members is recorded throughout the operational period.

This provides a fully auditable (internal and external audit), quality assured record of remediated soil at the facility, documenting environmental compliance, as well as quality metrics such as client satisfaction. The audited document records and QA outputs will provide the basis for the programme of continual improvements to be implemented under management review, as described in the previous section.

5. FACILITY MANAGEMENT PROCESSES AND PROCEDURES

5.1 Pre-Acceptance

Work enquiries received by UKRL will be reviewed for potential suitability for off-site treatment and then assessed for suitability for acceptance and treatment at the Exeter FSTF in accordance with the flow diagram presented in **Appendix D**.

Unsuitable materials, or those where other options are technically or commercially inappropriate, will be considered for on-site treatment, for treatment at other UKRL FSTFs, for onward brokering or for decline.

Only where suitable and sufficient material characterisation and classification has been completed by others, or by UKRL, will material be further considered for acceptance. Pre-acceptance procedures are described in further detail in **Appendix E**.

5.2 Waste Acceptance

The material acceptance procedures to be applied at the Exeter Facility are presented in **Appendix F**. Once the pre-acceptance checks are completed and where material is pre-classified as suitable for treatment at the facility, a live job is created, and the required technical and legal information is deposited in the document file. Once the documents have been inspected, a booking is made at the facility to receive the waste by the Site Manager.

On arrival, material is inspected by the Site Manager and assessed for compliance with the supplied descriptions and paperwork. Where non-compliance is clear, or suspected, the material will be temporarily quarantined in the isolation bays constructed on the site for this purpose and the client will be contacted. Further chemical testing and evaluation may be undertaken at this stage.

Where non-compliance is established, the material will be rejected and commercial arrangement made with the client for either the return of the material or for brokering to a more suitable licensed facility. Waste rejection procedures are described in further detail in **Appendix G**.

Accepted soils will enter the pre-processing and treatment phases and from there will go into an iterative cycle of testing and further treatment until the required remediation is complete and the reduction in the waste hierarchy classification achieved.

Arrangements are then made for onward consignment, recycling for reuse or for acceptance under a lower waste classification at another facility, as appropriate. Audit records are completed through this process.

5.3 Waste Rejection

Waste may be subject to rejection for various reasons, these include:

- Rejection due to Site Maintenance, breakdown or access issues.
- Rejection due to non-permitted waste (e.g. misclassification or unexpected contaminants that do not conform with the description/chemical analysis received during the pre-acceptance phase).
- Rejection due to incorrect, incomplete or missing paperwork.

In all events where material does not pass initial inspection, FSTF operatives will contact the UKRL main office issuing both a verbal and written explanation for rejection. Hazardous loads will be issued a rejection consignment note in the form REJECT/XXXXX using "XXXXX" as the 5 letters or numbers used to give the load a unique code. A copy of this will be given to the carrier on-site and sent to the client. The Environment Agency will be informed of all rejected waste.

UKRL also have an internal Corrective Action Report (CAR) which will be created and circulated within the company, and to the client if necessary. Main office will then issue the consignment note and CAR to the client/producer for further discussion of the options for the rejected waste dependent on reason for rejection. Potential outcomes for rejected waste include:

- Re-delivery of rejected waste
- Quarantine of waste

- Removal of waste to producing site or to a new permitted facility
- Re-acceptance of waste

All outcomes will be recorded on the CAR.

More detail regarding the rejection procedure is documented in **Appendix G**.

5.4 Process Emissions Analysis and Emissions Inventory

The processes employed at the Exeter facility have been analysed for potential emissions release points to air, land and water. Process flow diagrams from the main treatment procedures are presented in **Appendix H**, showing the main point source and diffuse emission risks identified.

This information has been used to compile an emissions register, presented in **Appendix I**.

5.5 Emissions monitoring

As potential emissions to ground are controlled by the construction of a hard, impermeable surface across the treatment area, with surface water management and control via the on-site water treatment plant, ongoing monitoring of ground and groundwater is not proposed. Emissions monitoring during the period of the operation of the Permit is therefore directed at potential releases to air and water.

The potential emissions identified in the Emissions Analysis is regularly monitored and recorded in accordance with the details submitted elsewhere, using appropriate Environmental Monitoring Forms. Sample forms are presented in **Appendix J**.

Exceedances of the applied action levels for Air and Water emissions will result in temporary suspensions and site-based review of procedures, as set out in the Technical Summary document. Any systemic issues of non-compliance will be highlighted within the EMS management and audit systems described above and subject to intervention to achieve sustained improvement. The Agency will be informed of any significant issues identified and of corrective actions taken.