



Environmental Risk Assessment

Hill Barton

30th October 2025

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Author	Jessica Easterbrook
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Environmental Risk Assessment

Hill Barton



Name: Jessica Easterbrook
Job title: Senior Permitting Consultant



Name: Sophie Rainey
Job title: Senior Environmental Permitting Manager

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1. INTRODUCTION

As part of an application for an environmental permit Operators must assess the risk to the environment and human health from the activities they seek to permit. This Environmental Risk Assessment (ERA) has been undertaken in accordance with the online guidance for undertaking environmental risk assessments and presented in Table 3.1.

Environmental risks relevant to the proposed activities are:

- Emissions to Air;
- Emissions to Water;
- Emissions to Land;
- Odour;
- Noise;
- Litter;
- Pests;
- Vandalism;
- Fire;
- Climate change; and
- Incompatible Wastes.

For each of the above environmental criteria the approach to the assessment has followed the following four stage process:

- Identify the risks;
- Assess the risks (assuming those control measures proposed are in place);
- Choose appropriate further measures to control these (if required); and
- Present the assessment.

In all cases, the overall risk assessment associated with the site concludes that the site presents a low risk.

2. SITE DETAILS

The site is currently regulated in accordance with the conditions established by the Environmental Permit EPR/LP3939TS to process 75,000 tonnes per annum of hazardous and non-hazardous waste soils, spoils and sludges per year using two distinct treatment techniques, Bioremediation and Soil Washing.

UK Remediation is making this application to carry out a 'Normal' Variation of their existing EPR permit under The Environmental Permitting (England and Wales) Regulations 2018 (as amended) in order to extend their existing permit boundary and to increase the scope of the treatment techniques on site to include a waste sludge treatment process, topsoil/aggregate recovery and asbestos hand-picking station. Therefore, this variation will also include additional waste codes and increase the facilities capacity to process 150,000 tonnes per annum.

2.1 Site Location

The site is located at Unit 11b, Hill Barton Business Park, Clyst St Mary, Exeter, EX5 1DR.

The location of the proposed development is provided overleaf in Figure 2.1.

The proposed site installation boundary is provided overleaf in Figure 2.2.

2.2 Sensitive Receptors

Environment Agency (EA) H1 and H5 guidance states that the potential impacts of the site should be assessed for the following habitat sites within 10km of the site:

- Special Areas of Conservations (SACs) and candidate SACs (cSACs) designated under the EC Habitats Directive;
- Special Protection Areas (SPAs) and potential SPAs designated under the EC Birds Directive; and
- Ramsar Sites designated under the Convention of Wetlands of International Importance.

It is also stated that within 2km of the Source:

- Sites of Special Scientific Interest (SSSI) established by the 1981 Wildlife and Countryside Act;
- National Nature Reserves (NNR);
- Local Nature Reserves (LNR);
- Local Wildlife Sites (LWS), County Wildlife Sites (CWS) and potential wildlife sites (PWS);
- Sites of Importance for Nature Conservation (SINC); and
- Ancient Woodland.

Information from the Multi Agency Geographic Information for the Countryside (MAGIC) website (<http://magic.defra.gov.uk/>) has been used to obtain the above information.

The designated sites are shown below in Table 2.1.

Table 2.1 Location of Sensitive Habitat Receptors

Distance and Direction	Receptor	Status
4.1 km southwest	Exe Estuary	Ramsar / SPA
4.2 km east	East Devon Pebblebed Heaths	SAC / SPA
1.3 km east-northeast	Farringdon School	LWS
2.0 km north-northeast	Beautiport	LWS



Figure 2.1 Site Location



Figure 2.2 Proposed Site Installation Boundary

3. RISK ASSESSMENTS

Table 3.1 Environmental Risk Assessment

Hazard	Receptor	Pathway	Risk Management Techniques	Probability of Exposure	Consequence	Overall Risk (following Mitigation)
Point Source \ Releases to Air	Atmosphere	Airborne	<ul style="list-style-type: none"> Emissions to air from the facility will be limited to one point source emission to air (A1) from the Asbestos Handpicking Station. The stack will be fitted with HEPA Filters in accordance with BAT requirements. The HEPA filters utilised on site are designed to filtrate up to 99.995% of small particles. Asbestos fibre monitoring is undertaken when the asbestos picking station is in operation. The asbestos handpicking station will be fully enclosed to prevent any fugitive emissions to air. At the end of each shift that the asbestos handpicking station is operational the unit will be cleaned and air tested to ensure no accumulation of fibres. 	Low: offsite receptor impacts	Air Pollution	VERY LOW due to the proposed processes on site

			<ul style="list-style-type: none"> The site also operates a Dust Management Plan which is provided in Annex G – Dust Management Plan. 			
Emissions to Water	Groundwater / Geology / Surface Water	Waterborne	<ul style="list-style-type: none"> There will be no direct process emissions to controlled water arising from the Installation. The entire site will be constructed on concrete hardstanding with a sealed drainage system. All surface water runoff will leave site by a low-level bund around the entire site perimeter. The site is graded to ensure all runoff flows to the bunded area and then into one of two treatment/attenuation tanks prior to being pumped to public foul sewer. All leachate/runoff will also be directed by gradient to the sites interceptor where it will be processed through the water treatment system before temporary storage in the attenuation tank, once tested and safe for disposal it will be discharged via public foul sewer. In the event of a fire on site, the drainage system would be isolated to prevent any fire water escaping off site. 	Low: all runoff is controlled on site; therefore, the probability of exposure is low.	Contamination	VERY LOW due to the proposed management techniques and drainage arrangements

Emissions to Land	Groundwater / Geology	Spills / Leaks	<ul style="list-style-type: none"> • There will be no emissions to land arising from the proposed facility. • The entire site will be constructed on concrete hardstanding with a sealed drainage system. • Spill kits will be strategically located around site. • Minor spills to be cleaned up immediately, using spill kits. Resultant materials to be placed in container for off-site disposal to appropriate facility, if necessary. • Immediate action to be taken in event of any major spills. Spillage to be cleared immediately and placed in containers for offsite disposal. • Although the risk from potentially polluting leaks and spillages at the site is low, in the event of a spillage immediate measures will be taken to contain and manage it in accordance with the above procedures. 	<p>Low: spills / leaks could potentially contaminate the ground / groundwater underneath the site.</p>	Contamination	<p>VERY LOW due to the proposed risk management techniques</p>
Noise	Sensitive Receptors in close proximity	Airborne	<ul style="list-style-type: none"> • The plant has been designed to ensure that all noise emissions are abated and mitigated as far as reasonably possible. • Appropriate preventative maintenance will be provided for all plant and equipment on site. This will ensure no 	<p>Low: due to the nature of the activities</p>	Nuisance	<p>LOW due to the nature of the operations</p>

			<p>deterioration of plant or equipment that would give rise to increases in noise.</p> <ul style="list-style-type: none"> • All plant and buildings will be located appropriately. • Equipment and plant will only be operated by trained and experienced staff. • A Noise Impact Assessment is provided in Annex I – Noise Impact Assessment. • The facility will not give rise to reasonable cause for annoyance. In the unlikely event that complaints are received measures described in the integrated management system will be put in place. 			
Odour	Sensitive Receptors	Airborne	<ul style="list-style-type: none"> • The fundamental design of the facility has a hierarchy of odour control and abatement measures to ensure that the potential for odour impacts are eliminated. • The site has stringent waste pre acceptance and acceptance procedures which will ensure that no excessively odorous waste will be accepted onto site. Any potentially excessively odorous waste loads are immediately rejected upon arrival in accordance 	Medium: the operations on site will not produce odour emissions	Nuisance	LOW due to the nature of the operations

			<p>with the sites waste rejection procedures. Should any odorous waste be mistakenly accepted, it will be transferred to the quarantine area and removed at the earliest opportunity.</p> <ul style="list-style-type: none"> • An odour suppression system is deployed around the entire site perimeter. • Odour shall be monitored daily at points around the site boundary and observations shall be noted in the site diary and/or on a daily monitoring document. • Although it is considered that there is very little potential for odour complaints arising from site activities, any complaints will be immediately investigated and appropriate measures implemented if necessary. • The site has a dedicated Odour Management Plan, please refer to Annex F – Odour Management Plan. 			
Dust	Sensitive Receptors	Airborne	<ul style="list-style-type: none"> • The site has stringent waste pre acceptance and acceptance procedures which will ensure that no excessively dusty waste will be accepted onto site. Any potentially excessively dusty waste loads are immediately rejected upon 	Low: the occurrence of dust during operations is unlikely	Nuisance	LOW due to the nature of the operations

			<p>arrival in accordance with the sites waste rejection procedures.</p> <ul style="list-style-type: none"> • Additional mitigation measures are implemented on site for the Asbestos Handpicking Station and include minimised drop heights, slow conveyors, double bagged waste and lockable skips. • The site benefits from a site wide dust suppression system which is utilised when necessary. • All vehicles entering or leaving the site will be sheeted to avoid any potential dust emissions. • The site has a dedicated Dust Management Plan, please refer to Annex G – Dust Management Plan. 		
Litter	Sensitive Receptors	Airborne	<ul style="list-style-type: none"> • Litter is unlikely to become a problem on site. • All incoming and exporting waste vehicles will be covered. • The site access and site services shall be swept as necessary. • The site shall be inspected daily by the site manager and any litter or accumulated debris shall be dealt with immediately. 	Low: the occurrence of litter on site is unlikely	<p>Nuisance</p> <p>LOW due to the nature of the operations</p>

Pests	Local Residents	Airborne & migration	<ul style="list-style-type: none"> • Pests are not likely to become a problem on site. • Monitoring for evidence of pests is included during the daily site perimeter inspection. • However, if a problem does develop, reasonable measures will be taken to use commercially available products and services to control pests. 	Low: the occurrence of pests on site is unlikely	Nuisance	LOW due to the nature of the operations on site
Vandalism	Operator	The site could be subject to intentional vandalism and damage by intruders / trespassers who could cause damage or harm to the site or cause fires.	<ul style="list-style-type: none"> • The site benefits from a perimeter fence and access gate. • The site will be well lit. • Fencing is maintained and repaired to ensure continued integrity. If damage is sustained, repair will be made within the same working day. If this is not possible, suitable measures will be taken to prevent unauthorised access to the site and permanent repairs will be affected as soon as is practicable. • All visitors to the site are required to register in the visitor's book and sign out again on exit, thereby minimising the risk of unauthorised visitors on the site. • Operational procedures have been implemented including regular inspections, ensuring continual 	Low: the occurrence of vandalism taking place on site is highly unlikely.	Nuisance, Damage or Fire	VERY LOW due to the proposed risk management techniques

			<p>monitoring of security provision at the site.</p> <ul style="list-style-type: none"> Gates and fencing are inspected daily by operations staff to identify deterioration and damage and the need for repair. 			
Fire on site	Operator / Residential Properties	Windborne	<ul style="list-style-type: none"> The site is well lit and secured by a perimeter fence. The site is operated in accordance with the Site Accident Management Plan which is provided in Annex H – Accident Management Plan. The site is also operated in accordance with the sites Fire Prevention Plan which is provided in Annex J – Fire Prevention Plan. The site has a regular inspection and maintenance programme which identifies any electrical or mechanical machinery faults which could result in a machinery fire. Machinery is regularly cleaned to remove any dust, etc. All relevant equipment on site is equipped with dedicated fire extinguishers. 	Low: the occurrence of a fire taking place on site is unlikely	Fire	Low due to the proposed risk management techniques and nature of operations

			<ul style="list-style-type: none"> • Staff and visitors are not permitted to smoke on site. 			
Incompatible Feedstock	Operator / Residential Properties	Airborne	<p>The following methods will be implemented to ensure that incompatible wastes do not compromise the safe operation of the facility:</p> <ul style="list-style-type: none"> • All wastes accepted onto site have been subject to 'pre-acceptance' in accordance to an established procedure. • All waste is accepted in accordance with an established waste acceptance procedure. • Any non-conforming waste will be removed prior to acceptance in accordance with an established waste rejection procedure. • Records of incidents involving incompatible wastes will be kept on site together with a summary of the remedial action taken. 	Low: off site receptor impacts	Nuisance Contamination	LOW: due to the proposed management measures implemented on site
Climate Change	Groundwater / Geology / Surface Water / Sensitive Receptors	Waterborne/ airborne	<ul style="list-style-type: none"> • The site lies within Flood Zone 1 with a negligible chance of flooding. • The site is constructed on concrete hardstanding and benefits from a sealed drainage system. 	Low: offsite receptor impacts	Contamination	VERY LOW due to the proposed processes on site

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| | | <ul style="list-style-type: none">• The site benefits from a Dust and Odour Management Plan which will be reviewed if weather conditions deem the management plans to become insufficient. | | |
|--|--|--|--|--|

ETF Environmental Risk Assessment**Project Details:**

Site Name:	ETF Fixed Soil Treatment Centre	
Site Location:	Hil Barton Business Park, Exeter, EX5 1DR	
Document Author:	Ed Bailey	
Date:	08/05/2025	

Environmental Risk Assessment							
Hazard	Identified source	Identified targets	Identified pathways	Consequence	Risk management provisions	Probability of exposure	Overall risk
Leachate from Biopiles under roofed area	Bio-piles	Surface water quality of the ditch to the west of the site. Human health	Surface water runoff.	Overflow into local ditch	Containment via impermeable concrete bund and kerbing around site. Leachate to drain into containment capture to tank (24,000L) prior to disposal.	Non-Existent to Minimal.	Not significant
Leachate from Sheeted biopiles on non-roofed concrete area	Bio piles, Concrete Apron	Surface Water Quality of the area surrounding the concreted area	Surface water runoff during inclement weather conditions.	Overflow into local ditch	Containment via impermeable concrete or membranes, containment capture to tank (24,000L) Flow switch and over pumping system to treatment plant and above ground attenuation tank prior to disposal Keep concrete areas free of debris via scraping with Loading shovel	Minimal unless inclement weather	Minimal
Contaminated Water Runoff. (including suspended solids)		Human Health.		Overflow into local ditch.			
Contamination from Fuel Spillage during refuelling or plant malfunction on concrete apron.	Plant / Fuelled Equipment	Surface water Quality and soils surrounding concreted area.	Surface runoff. Potential rogue emissions likelihood increased in inclement weather	Overflow into local ditch or surrounding areas in severe inclement weather.	Spill kits onsite. Plant will be operating inside concrete banded area.	Minimal with adequate plant servicing. Residue from spill can also be processed by water treatment system.	Not significant.
Contamination into discharge sewer as a result of Soil Wash plant / water treatment pipe work plant malfunction / rogue emission into sewer.	Soil Washing Plant Water Treatment Plant	Discharge Sewer	Pipe work, Plant	Rogue Emissions into Sewer or air.	Automated Safety cut valves and alarms on washplant Water treatment system checked visually and chemically tested during operation. Site impermeable surface and bunds allow for containment of all process water. No automatic discharge into foul sewer as can be contained onsite	Minimal with supervision and plant servicing	Significant but minimal if managed correctly please

Environmental Risk Assessment							
Hazard	Identified source	Identified targets	Identified pathways	Consequence	Risk management provisions	Probability of exposure	Overall risk
Volatile Organic Compound Odours from Biopiles and or offloading of contaminated materials during receipt from Tipper Lorries	Bio-piles, Tipper Lorries, Turning of Biopiles.	Neighbouring sites: Coastal Waste building . Morrison Utilities depot. Stuarts Ltd landfill site office. Nearest Domestic property is approximately 500m from site.	Air (Wind is predominantly South Westerly)	VOC's in air causing odour and possible health issues Complaints from local stakeholders.	Waste approval / rejection process Minimise through use of an odour suppression agent in the dust suppression system. Monitoring of VOC's via Photo Ionisation Detector sealed plastic sheeting used as a contingency.	More likely in summer due to higher evaporation. Previous records show low probability.	Significant but Minimal if managed correctly.
Incompatible Waste Streams	Incoming Tipper Lorries	Fixed Soil Treatment Centre	Vehicles	Untreatable waste.	Adherence to Waste Characterisation Protocols. Quarantine area / skips in place.	Minimal	Minimal
Odour from Odour Control System	Spray bars of Odour Control system. Both in Roofed area and on the perimeter of the surrounding fence.	Neighbouring sites: Coastal Waste building . Morrison Utilities depot. Stuarts Ltd landfill site office. Nearest Domestic property 500m from site.	Air (Wind is predominantly South Westerly)	Complaints from local stakeholders	Use odour control system where necessary. Monitor necessary output. Scent can be changed	Probable. However given location odour is being covered by surrounding industry.	Significant but can be managed.
Dust, fibres or Particulates.	Screening and handling of Soils. Vehicle movements		Air / Wind	Complaints from local stakeholder	Water suppression measures where required Vehicles running on tarmac and concrete. Good housekeeping of concrete. Odour control	Weather / Season Dependant.	Significant in dry weather but minimal if managed correctly.

Environmental Risk Assessment							
Hazard	Identified source	Identified targets	Identified pathways	Consequence	Risk management provisions	Probability of exposure	Overall risk
					system also keeps dust down. Dust gauges can be used to quantify levels.		
Asbestos	ACM impacted materials/asbestos picking operation		Air / Wind	Emissions to air Long term health issues	Water suppression measures. Full asbestos PPE, including FFP3 masks, Tyvek suits and cut free gloves. All employees to have undergone CAT B training Asbestos air monitoring ongoing during operations	Fairly probable with import of soils with corrugated ACM	Minimum with risk management provisions
Noise	Plant, equipment and generators on site. Reversing noises		Air / Wind	Complaints from local Stakeholders	Silencers and baffles installed. All equipment adequately maintained. Vehicles with reversing signals are not in operation consistently	Very minimal given local industry with somewhat noisier operations.	Not significant
Vibration	Plant, light mobile equipment and generators on site Soil Washing Plant Asbestos Hand Picking Station Heavy wheeled mobile plant, tipper lorries loading shovel	ECOSci building 150m North of site. Morrison Utilities depot. EMS Skips.	Ground	Complaints from local Stakeholders	Vibration from light <5t fixed plant not considered to be an issue Vibration from heavy wheeled plant not considered to be an issue due to tyres and non-consistent working.	Very minimal given local industry. Vibration monitors can be used in the event of complaints.	Not significant
Vibration from fixed (Soil washing) or semi mobile plant (Screeners / Crushers)	Operation	ECOSci building 150m North of site. Morrison Utilities depot. EMS Skips.	Ground	Complaints from local stakeholders. Disruption of infrastructure in extreme cases.	Will be monitored dependant on plant in operation. Vibration monitors to be used at the 4 monitoring points for control as required. If obvious vibration issue occurs due to	Possible.	Significant but minimal if monitored/ managed correctly.

Environmental Risk Assessment							
Hazard	Identified source	Identified targets	Identified pathways	Consequence	Risk management provisions	Probability of exposure	Overall risk
					plant malfunction, work will be halted and issue managed		
Mud and debris From vehicles	Vehicle movements tracking in contaminated materials.	Hill Barton Business Park private traffic routes. A3052	Tracked on vehicles, deposited on roads	Road Hazard, skidding and debris. Complaints from local Stakeholders. Highway fouling	Good housekeeping on site traffic management routes.(using loader brush to clean site slab), careful loading and regular cleaning. Road Sweeper as a contingency. Unload in a systematic manner to prevent running on contaminated soils. Pressure wash tyres prior to leaving site if required	Probable in inclement weather. Still significant risk in dry weather	Significant but greatly reduced if managed correctly.
Litter	Packaging from equipment delivery Litter in soil	ECOSci building 150m North of site. Morrison Utilities depot. EMS Skips. Inert Tip. Hill Barton Business Park	Windblown / Pests	Complaints from local Stakeholders	Waste packaging from site materials deposited in skips. Skips shall be covered to prevent wind blow. Vacuum of litter in soil into closed skips.	Not significant	Not significant
Pests	Biopiles, Waste Skip, Site Offices	Site personnel Neighbouring sites: Coastal Waste building . Morrison Utilities depot. Stuarts Ltd landfill site office.	Air, Ground	Complaints from local Stakeholders Disease	Waste packaging from site materials deposited in skips. Skips shall be covered to prevent wind blow. Sheeted Biopiles turned regularly. No food waste (site offices) to be left uncovered.	Minimum No pest issues recorded	Not significant
Vandalism	Criminal	Site office, stores, heavy plant, chemical stores, stockpile covers.	Air, Ground, Water	Dependant on nature of and intensiveness of crime. Must be managed accordingly	All liquid holding stores and tanks located within bunded area. Pipe work located within bunded area. 2.4m anti climb Palisade fence with lockable gates. Metal window shutters and all containers locked at night	Vandalism in true sense of work very unlikely. Theft more likely.	Minimum.

Environmental Risk Assessment							
Hazard	Identified source	Identified targets	Identified pathways	Consequence	Risk management provisions	Probability of exposure	Overall risk
Fuel Storage	Fuel Browsers	Groundwater	Ground, Water	Environmental Pollution.	Fuel Browsers to be double bunded and lockable. Trained filling personnel. Machinery not to be left unsupervised during filling operations.	Minimum	Minimum.
Chemical Storage (Spills)	Chemical Storage. Liquid IBC's		Ground, Water	Environmental Pollution.	All liquid holding stores and tanks located within bunded area. IBC's on correct bunds as required. MSDS and COSHH sheets available and adhered to Chemical Spill Kits and Lockable skip for used spill materials	Minimum	Minimum
Chemical Storage (Spills)	25kg Bags	ECOSci building 150m North of site. Morrison Utilities depot. EMS Skips. Inert Tip. Hill Barton Business Park. Groundwater	Air, Ground, Water	Environmental Pollution.	MSDS and COSHH sheets available and adhered to All chemical bag holding stores located within bunded area. Check for bag integrity prior to removal from store. Well managed application of chemicals. (i.e. common sense / management in windy conditions)	Minimum	Minimum
Chemical Storage Fire	25kg Bags. Liquid IBC's	ECOSci building 150m North of site. Morrison Utilities depot. EMS Skips. Inert Tip. Hill Barton Business Park. Groundwater	Air, Ground, Water	Environmental Pollution, Human Health	All liquid holding stores and tanks located within bunded area. Adherence to Fire Safety and accident management protocols	Minimum	Minimum
Legionella	Water containing elements, such as odour control and water treatment system.	Site Workers / Water maintenance staff	Air, Water	Incidence of symptoms	Water systems managed to HSE approved Code of Practice (ACoP) Regular inspection and Yearly servicing.	Minimum.	Minimum if managed

