NON-TECHNICAL SUMMARY

This document has been prepared on behalf of UK Remediation Limited ('UK Remediation' or 'Operator' hereafter) by Sol Environment Ltd and provides supporting evidence as required by Environmental Permit Application Forms Part C2 and C3 issued by the Environment Agency (EA).

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 facility's capacity to process 150,000 tonnes per annum.

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

The site is currently regulated in accordance with the conditions established by the Environmental Permit EPR/LP3939TS/V002 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.

The Bioremediation activities are currently permitted under the following Schedule References:

- Section 5.3 Part A(1)(a) 'The disposal of hazardous waste (other than incineration or landfill) in a facility with a capacity of more than 10 tonnes per day'; and
- Section 5.3 Part A(1)(c)(i) 'The disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by biological treatment'.

The Soil Washing activities are currently permitted under the following Schedule References:

- Section 5.3 Part A(1)(a) 'The disposal of hazardous waste (other than incineration or landfill) in a facility with a capacity of more than 10 tonnes per day'; and
- Section 5.3 Part A(1)(c)(ii) 'The disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physico-chemical treatment'.

The site is also permitted to carry out a number of Directly Associated Activities as well as a separate 'Waste Operation' for the Biological and Physico-chemical Treatment of non-hazardous waste for re-use.

Since the Environment Agency (EA) issued the most recent version of the permit in 2012, the Environmental Permitting Regulation have been updated (The Environmental Permitting (England and Wales) Regulations 2018 (as amended)) and the existing activities now meet the following Schedule References:

Bioremediation:

- Section 5.3 'Disposal or recovery of hazardous waste' Part A(1)(a)(i) 'Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving biological treatment; and
- Section 5.4 'Disposal, recovery or a mix of disposal and recovery of non-hazardous waste' Part A(1)(b)(i) 'Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.'

Soil Washing:

- Section 5.3 'Disposal or recovery of hazardous waste' Part A(1)(a)(ii) 'Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment; and
- Section 5.4 'Disposal, recovery or a mix of disposal and recovery of non-hazardous waste' Part A(1)(a)(ii) 'Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving physico-chemical treatment.

The inclusion of the asbestos handpicking station as part of this permit variation will introduce two additional listed Activities as detailed below:

- Section 5.3 'Disposal or recovery of hazardous waste' Part A(1)(a)(vi) 'Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving recycling or reclamation of inorganic materials other than metals or metal compounds; and
- Section 5.6 'Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes'.

The proposed sludge treatment and topsoil/aggregate recovery is included as part of the current operations on site and therefore do not require additional listed Activities.

UK Remediation would also like the site address updated on the permit to accurately reflect the site. The site address is UK Remediation, Unit 11b, Hill Barton Business Park, Clyst St Mary, Exeter, EX5 1DR.

Emissions to Air

The existing site currently has no point source emissions to air.

As a result of this permit variation, there will be one point source emission to air (A1) from the stack associated with the enclosed asbestos handpicking process. As confirmed and detailed within the validation response submitted to the EA on 30th January 2026, the application does not include a H1 Assessment to air as there are no pollutant concentrations within the emissions from the asbestos handpicking station.

The asbestos handpicking process will be undertaken within an enclosed picking station to prevent the migration of potential asbestos fibres off-site during the hand picking process. The air within the picking station will be extracted through a stack, which will be fitted with a HEPA filter in accordance with BAT requirements. At the end of each asbestos picking operation, the unit will be professionally cleaned and air tested to ensure there won't be an accumulation of residual fibres between each picking operation.

Odour

It is recognised that there is potential for odour generation due to the nature of the wastes accepted on site. However, the proposed site is located in a long-established industrial area, and located approximately 770m from the nearest residential area, therefore, it is not located in a sensitive location.

The main source of potential odour is the acceptance of odorous wastes onto the site. As such, the primary prevention and control measure employed on site is the use of stringent waste acceptance procedures. Please refer to Annex E – Environmental Management System Summary for a copy of the waste acceptance procedures.

Additionally, an odour suppression system will be deployed to minimise airborne aerosols, bio-aerosols and fine particulates during unloading. The odour control system currently comprises of a perimeter misting

odour suppression system running above head height around the site boundary. An odour suppressant solution is sprayed across site via the spray bar system to neutralise odours. This system will be extended to cover the area of the planned extension.

The site will be operated in accordance with the Odour Management Plan provided within Annex F – Odour Management Plan.

Noise

An updated Noise Impact Assessment (NIA) has been completed as part of this permit variation. The NIA can be found in Annex I – Noise Impact Assessment. The NIA concludes that the rating levels are calculated to fall below the adopted background sound levels at all receptors identified within the NIA. Additionally, the existing area is industrial with varying uses and activities and it is unlikely that the proposed site operations would affect the existing character of the acoustic environment.

Emissions to Controlled Water

There will be no changes to emissions to controlled waters arising from this permit variation. The additional area added to the installation boundary has impermeable hardstanding with surface water draining to the existing water collection or newly installed collection attenuation tank on site as shown in Annex A - Figures.

The entire perimeter of the site, including the proposed additional area has a low-level bund to capture and contain surface water from leaving the site's perimeter.

The entire site has impermeable hardstanding with a fully contained and sealed drainage system.

Emissions to Sewer

UK Remediation have made an application to increase the throughput and discharge to sewer as a result of this permit variation, although run off water will be reused whenever possible.

A H1 Assessment has been completed and included in *Annex L – H1 Assessment to Sewer.* All substances pass the assessment and are successfully screened out except for Polyaromatic hydrocarbons (PAHs). However, PAHs are based on the worst-case scenario as the Waste Treatment BREF only references the Hydrocarbon Oil Index (HOI). It is considered highly unlikely that PAHs would make up the total HOI content in the discharge, and it is also highly unlikely that this volume of HOI substance is present. For example, when benzene is used in the model instead of PAHs (another high risk HOI component) it is screened out after test 2.

All surface water runoff from ground level surfaces is prevented from leaving the site by a low-level bund around the perimeter. The site is graded so that all rainfall landing within the bunded area flows to a one of two treatment/attenuation tanks prior to being pumped to the public foul sewer at a rate of 2 liters per second.

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, prior to discharge via public foul sewer. Water will be tested on a monthly basis. The water treatment system will consist of a sand filter to remove sediment (physical separation), and GAC filters to treat organic contaminants (adsorption) in accordance with EA BAT requirements.

Emissions to Land

There are no emissions to land arising from this permit variation.

Waste / Product Management

Following treatment on site, all waste/product on site will be recycled or disposed of off-site with a full audit trail kept. Table 4.1 in section 4.7 identifies the wastes produced on site and their classification.