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Non-Technical Summary

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CIWM
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2026

Site Address:
Rock Solid Processing Limited
Hill Barton IBA
Hill Barton Business Park Blackmore Road
Exeter EX5 1BA

Registered Office:
Unit 12 Stuart Way,
Hill Barton Business Park,
Exeter,
England,
EX5 1DR

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Terms and Definitions

Not all terms will be used in this document.

Term	Definition
Auditor	Person with the competence to conduct an audit.
Continual improvement	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance.
Corrective action	Action to eliminate the cause of a detected nonconformity.
Document	Information and its supporting media.
Environment	Surroundings in which site operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
Environmental aspect (EA)	Elements of sites activities or products or services that can interact with the environment.
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from sites environmental aspects.
Environmental management system (EMS)	Part of sites management system used to develop and implement its environmental policy and manage its environmental aspects.
Environmental objective	Overall environmental goal, consistent with the environmental policy.
Environmental performance	Measurable results of sites management of its environmental aspects.
Environmental policy	Overall intentions and directions of sites related to its environmental performance.
Environmental target	Detailed performance requirement applicable to site or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
Interested party	Person or group concerned with or affected by the environmental performance of site.
Internal audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by site are fulfilled.
Nonconformity	Non-fulfilment of a requirement.

Organisation	Site/Operator
EP	Environmental Permit.
NTS	Non-technical Summary.
ERA	Environmental Risk Assessment.
SCR	Site Condition Report.
EMS_OT	Environmental Management System and Operating Techniques. Compliant with Permit Condition 1.1.1.
FPP	Fire Prevention Plan.
NVMP	Noise and Vibration Management Plan.
OMP	Odour Management Plan.
Appropriate Measures	Appropriate measures are the standards that operators should meet to comply with their environmental permit requirements.
Site	Location of waste activities.
EA	Environment Agency
HSE	Health and Safety Executive
TCM	Technically Competent Manager

1 INTRODUCTION

This Non-Technical Summary (NTS) accompanies the application for a variation to an existing bespoke waste installation ERP/XP3503PF .The purpose of the variation is to update the permitted activities carried out at the Hill Barton IBA processing facility and to reflect operational changes required to increase the site's annual treatment capacity. The variation also ensures that all operations, management systems, and environmental controls remain fully aligned with current regulatory expectations, Best Available Techniques (BAT), and applicable sector guidance.

The Hill Barton facility currently receives, stores, and processes incinerator bottom ash (IBA) generated by external energy-from-waste (EfW) plants. Through a controlled sequence of mechanical treatment stages—including crushing, screening, magnetic separation, and eddy current separation—the installation produces incinerator bottom ash aggregate (IBAA) suitable for use as a secondary construction material. Recovered ferrous and non-ferrous metals are diverted for recycling, and unburnt residues are returned to the originating EfW facility for further treatment.

This NTS summarises the key elements of the variation application, explains the activities undertaken on site, and outlines the environmental controls that ensure the installation operates without presenting significant risk to human health or the surrounding environment. More detailed technical information—including risk assessments, site condition reporting, operating techniques, and environmental management procedures—is provided in the accompanying sections of the full permit variation application.

1.1 Pre-Application Discussions

Enhanced pre-application advice was requested from the EA on 20/11/2026, reference ERP/XP3503PF/P002. The aim is to increase the site's annual throughput from 100,000 tonnes to 150,000 tonnes per year, identify whether an NIA or FPP is required, and determine the necessary technical documents for this variation, including application fees. This would allow the site to move away from campaign processing to full time processing.

1.2 The Site

The facility is authorised to accept **up to, but not exceeding, 100,000 tonnes per year of incinerator bottom ash (IBA)** generated by off-site energy-from-waste plants for recovery purposes. Upon arrival, the unprocessed IBA is stored externally until a sufficient volume has accumulated for treatment. During this storage period, the material undergoes a natural ageing process, during which its cementitious characteristics allow a surface crust to form.

IBA treatment occurs within the site building and involves a series of mechanical processing stages. These include crushing, screening, and both magnetic and eddy current separation. The process produces graded incinerator bottom ash aggregate (IBAA) and removes ferrous and non-ferrous metals. All manufactured IBAA is destined for

use as construction aggregate, while recovered metals are sent to appropriate recycling facilities. Any unburnt residues are returned to the originating facility for further thermal treatment.

The installation is permitted to undertake the following activities:

- **S5.4 A(1)(b)(iii):** Recovery, or a combination of recovery and disposal, of non-hazardous waste exceeding 75 tonnes per day, specifically relating to the treatment of slags and ashes.
- **S5.4 A(1)(a)(ii):** Disposal of non-hazardous waste exceeding 50 tonnes per day through physico-chemical treatment.
- **Storage of IBA prior to treatment.**
- **Storage of wastes recovered from IBA processing.**
- **Collection and treatment of wastewater prior to discharge to sewer**, including storage of recovered sludge pending off-site disposal.
- **Storage of raw materials**, such as fuel and lubricating oils.

1.2.1 Site Location

Site is located at National Grid Reference (NGR) SY 0062091180/What3Words:masterful.supposing.amps.Site is accessed via Stuart Way, Blackmore Road adjoining A3052. Site lies to the east of Exeter.

Figure 1 Site Location (Aerial Photo)



1.3 Current Permit

The site is currently permitted under ERP/XP3503PF and has operated since 24/12/2019.

2 OVERVIEW OF APPLICATION

The application seeks to raise the site's throughput from 100,000 tonnes per annum to 150,000 tonnes per annum, reflecting a transition from campaign-based to continuous processing. No additional on-site storage will be necessary.

As well as updated the registered address from;

Unit 3 The Square Grampound Road Truro, Cornwall TR2 4DS

To

Unit 12, Stuart Way, Hill Barton Business Park , Exeter England, EX5 1DR.

2.1 Operations

The facility is allowed to take in up to 100,000 tonnes of incinerator bottom ash (IBA) each year from other energy-from-waste plants. When the IBA arrives, it is stored outside until there is enough to process. While it is stored, it naturally forms a crust on the surface. The IBA is then treated inside the building, where it goes through several mechanical steps such as crushing, screening, and separating metals. The process creates different sizes of ash aggregate for use in construction, and any metals are removed and sent for recycling. Any material that has not fully burned is sent back to the original plant for additional treatment.

2.2 Waste Acceptance

Waste accepted at the site is restricted to that described in the existing permit (19 01 12 bottom ash and slag other than those mentioned in 19 01 11).

As a minimum, the waste acceptance procedure will include.

- address/location
- identity of the producer
- the physical appearance of the waste
- amount of waste being accepted
- identifiable EWC Code

Site will only accept waste that is permitted and complies. Non-conforming wastes will be rejected or if identified after delivery, isolated and returned to producer.

Incoming waste will be brought to the site by registered waste carriers. Each load would be subject to the waste acceptance procedure and would be inspected by the Technically Competent Manager (TCM) or appropriately trained individual prior to being stored and prior to treatment.

2.3 Waste Storage

Table 1 Total Annual Waste Types

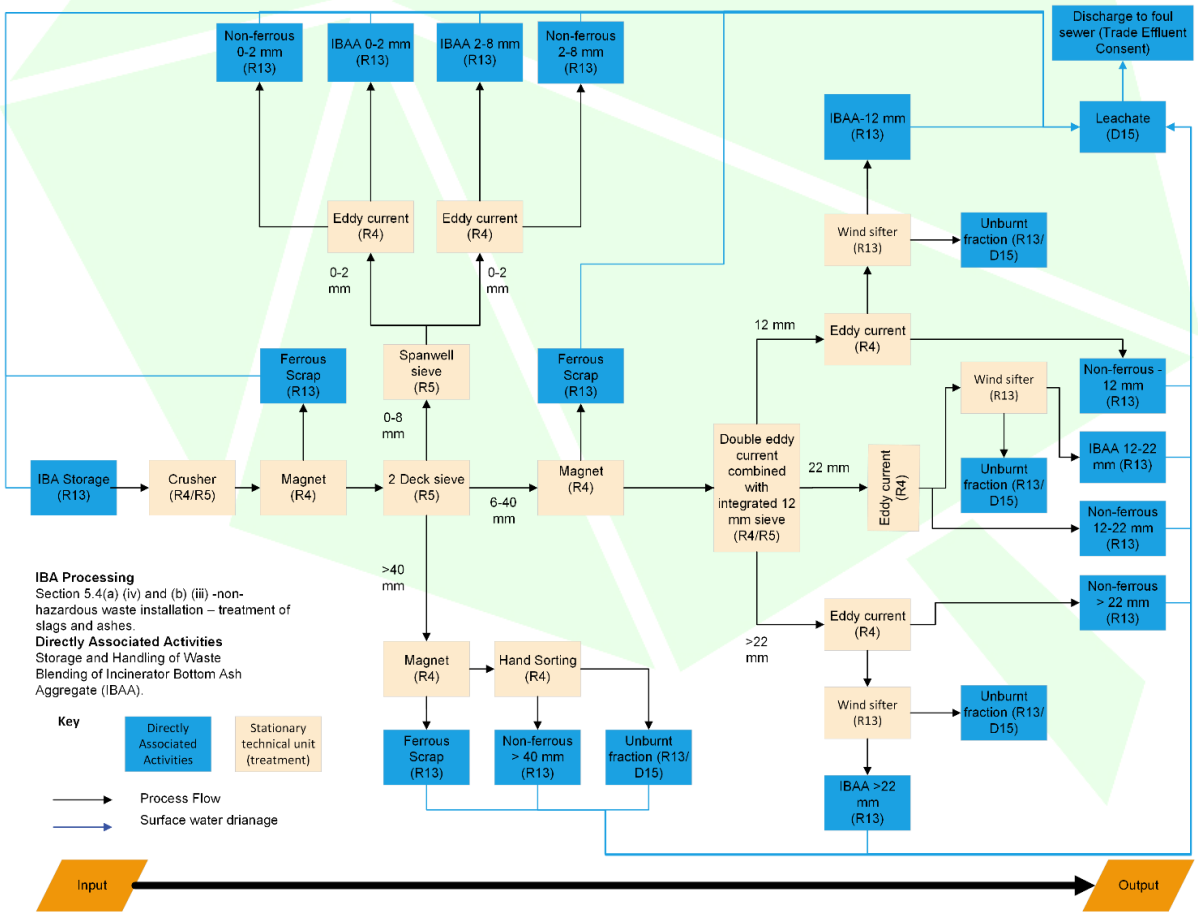
EWC	Material	Tonnes p.a.	Projected Change (tonnes)
19 01 12	12 bottom ash and slag other than those mentioned in 19 01 11	100,000	+ 50,000

Table 2 Total Storage at Any One time

Area of Site	Waste Types	Maximum total storage volume (m^3)
External	IBA	16,800
Totals		**16,800**

2.4 Waste Handling and Processing

No change in waste processing. Operations will continue as below.



On site Leachate treatment;

2.5 Site Management

A Technically Competent Manager (TCM) manages the operation and attends site in compliance with the regulatory defined attendance requirement. Individuals such as site supervisors or yard managers can be trained to carry out ongoing site operations, office and plant operations in lieu of the TCM when not in attendance.

During hours of operation there will be a minimum of one member of staff on site, who will be fully conversant with the requirements of the Environmental Permit and the Environmental Management System regarding the following:

- waste acceptance and control procedures
- operational controls and environmental monitoring
- maintenance
- record keeping
- emergency action plans
- Fugitive Emissions

3 APPLICATION CONTENTS

3.1 Application Forms

Parts A, C2, C3, C6 and F1 of the EA's EP application forms have been completed in support of this variation application and are enclosed as Section 01. The application forms also require the following additional information, which has been included:

- Appendix 1: List of Directors;
- Appendix 2: WAMITAB Certificates and Operator Competence Certificates; and

3.2 Application Fee

3.3 Environmental Risk Assessment

An Environmental Risk Assessment (ERA) (016.4_05_002) is located in section 04 of this application pack. The ERA identifies the sites setting, environmental hazards caused by the waste activity and the operators mitigation methods whether than be hard engineering or managerial procedures. This mitigation is designed to protect the environment from fugitive emissions or point source emissions if stated.

The site is operated by **Rock Solid Processing Limited** An Environmental Management System (EMS_OP) has been created detailing the sites operations and any environmental controls. The EMS_OP explains the sites operations, maintenance procedures and describes the emergency response in the event of an accident and or incident

3.4 Site Condition Report

A Baseline Site Condition Report (SCR) is a requirement for the addition of a listed activity. The baseline SCR describes the condition of the site and will provide a point of reference and baseline environmental data. Therefore, when the EP is surrendered it can be demonstrated that there has been no deterioration in the condition of the land as a result of the proposed operations and ensure that the condition of the land is in a 'satisfactory state' on surrender of the EP.

The site will continue to operate with due regard to the conditions of the EP and all relevant environmental legislation to ensure that the site does not pose a significant risk to the surrounding human and natural environment.

The Baseline SCR (reference 016.4_05_006) is included as Section 10 of this EP variation application.

3.5 Environmental Management System and Operating Techniques (EMS_OP)

The site will be operated in accordance with the Operating Techniques (OT) and Environmental Management System (EMS) document. This document sets out best practice for operating the site, based on legislation and

best available techniques in the industry. It will also include associated procedures which the site will operate in accordance with.

The OT and EMS will ensure that:

- The risks that the activities pose to the environment are identified;
- The measures that are required to minimise the risks are identified;
- The activities are managed in accordance with the OT and EMS;
- Performance against the management system is audited at regular intervals; and
- The EP is complied with.

The OT and EMS (reference 016.4_05_003) is included as Section 05 of this EP variation application.

3.6 Fire Prevention Plan

An FPP was identified to not be required during the pre application advice.

3.7 Odour Management Plan

An OMP was identified to not be required during the pre application advice.

3.8 Dust Emissions Management Plan

The ERA identified that a ERA was required, 016.4_05_004 presented in section 06.

The DEMP will be incorporated into the site's procedures and will be revised as necessary to ensure that it remains appropriate to the activities occurring on site and that any changes in conditions relating to dust management are dealt with as part of those revisions. In particular, the monitoring procedures and compliance actions will be updated as required by the procedures within the DEMP.

3.9 Best Available Techniques Assessment

A BAT assessment is provided in section 09, 016.4_05_005 BAT assessment.

3.10 Drawings

A suite of drawings has been produced to detail all characteristics of the site relevant to the variation application and are enclosed as Section 07 of this EP variation application. The full list of drawings produced is as follows:

Ref	Name	Revision
016.4_09_001	Permit Boundary Plan	REV A
016.4_09_002	1 km Sensitive Receptors	REV A
016.4_09_003	2 km Sensitive Receptors	REV A

016.4_09_004	10 km Sensitive Receptors	REV A

4 TECHNICAL STANDARDS

The following technical standards have been utilised in the design and development of the proposed activities, the preparation of this Environmental Permit application, and will govern permitted site activities:

- Sector Guidance Note IPPC S5.06 'Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous waste' May 2013European Directive 2010/75/EU — on industrial emissions
- Noise and vibration management: environmental permits[1]
- Develop a management system: environmental permits.[2]
- Control and monitor emissions for your environmental permit[3]
- Containment systems for the prevention of pollution (C736)[4]
- Best Available Techniques (BAT) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control); EUR 29362 EN; Publication Office of the European Union, Luxembourg, 2018
- BAT - Waste Incineration | EU-BRITE [5]
- Non-hazardous appropriate measures[6]
- Relevant EA Guidance e.g. Environmental Risk Assessment's, DEMPs, FPPs.

As an 'installation' under the Industrial Emissions Directive the permitted site must achieve 'BAT'. Best Available Techniques (BAT) means the available techniques which are the best for preventing or minimising emissions and impacts on the environment. Techniques include both technology used and the way the installation is designed, built, maintained, operated and ultimately decommissioned.

[1] https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits
[2] https://www.gov.uk/guidance/develop-a-management-system-environmental-permits
[3] https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
[4] https://www.ciria.org/
[5] https://bureau-industrial-transformation.jrc.ec.europa.eu/reference/waste-incineration-0
[6] https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities

5 APPENDICES

Appendix 1 List of Directors

Appendix 2 WAMITAB Certificates and Operator Competence Certificates

City & Guilds
National
Vocational
Qualification

WAMITAB 1989 INCORPORATED

MANAGING TRANSFER OPERATIONS CLINICAL OR SPECIAL WASTE
LEVEL 4
(Q1026781)

This Certificate
is awarded to IAN STUART EDGECUMBE

The holder has one or more formal Certificates of Unit Credit by which this award was earned.

Awarded NOVEMBER 2003 0311/053033 /073407/WPC2494/1/03/11/61/

C. Humphries
Director-General
The City and Guilds of London Institute

Qualifications and Curriculum Authority

Lawrence Strong
Director-General
Waste Management Industry
Training & Advisory Board

City & Guilds, NEBS Management and Pitman Qualifications are all awarding body titles within the City & Guilds Group, which includes The City and Guilds of London Institute (*Incorporated* by Royal Charter *Founded* 1878).



wamitab

Qualification Title:

WAMITAB Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer

Qualification Accreditation Number:

601/8528/4

This Certificate is awarded to

Ian Edgecumbe

Verification date: 17/08/2020

Authorised:

Learner ID: 12425

Certificate No.: 5168544

Date of Issue: 28/08/2020

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900D-FFA2FABE9547

AuthentiQual.com

Katie Cockburn
Director of Qualifications and Standards

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00153262



CIWM

Qualification Title:

CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-Hazardous Waste Treatment and Transfer

Qualification Accreditation Number:

601/8528/4

This Certificate is awarded to

Andrew Beasor

Verification date: 13/10/2025

Authorised:

Katie Cockburn
Responsible Officer

Learner ID: 138823

Certificate No.: 5291773

Date of Issue: 15/10/2025

91450AA3-44E3-4AA4

8B5C-6507BFEF42C9
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