

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Rock Solid Processing Limited

Hill Barton IBA
Hill Barton Business Park
Blackmore Road
Exeter
EX5 1BA

Variation application number

EPR/XP3503PF/V003

Permit number

EPR/XP3503PF

Hill Barton IBA

Permit number EPR/XP3503PF

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

Changes introduced by this variation notice:

This variation has been issued to update the permit following a statutory review of the permits in the industry sector for treatment of incinerator bottom ash.

The Industrial Emissions Directive (IED) came into force on 7th January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) conclusions as described in the Commission Implementing Decision. The BAT conclusions for incineration were published on 03 December 2019 in the Official Journal of the European Union (L323) following a European Union wide review of BAT, implementing decision 2017/2117/EU of 21 November 2017.

The main features of the permit are as follows.

Hill Barton IBA site is located within an industrial area where there are various activities taking place. The site is located between a composting site and bioenergy producing facility. The closest sensitive receptor to the site is a farm that is located 700m northeast of the site.

The facility is permitted to accept less than 100,000 tonnes per year of incinerator bottom ash (IBA), produced by off-site incineration plants for recovery. Unprocessed IBA when imported into the site is stored outside until a sufficient tonnage has been reached for treatment. During the storage time, the IBA goes through a 'natural ageing' process which enables it to form a crust on the surface due to its cementitious properties. The IBA is processed through a series of mechanical sorting mechanisms, including crushing, screens, eddy current and magnetic metal separation to produce different grades of processed incinerator bottom ash aggregate (IBAA) and remove ferrous and non-ferrous metals. This takes place within the site building.

All finished IBAA is to be used as aggregate and ferrous and non-ferrous metals are sent for recycling at an appropriate facility. Any unburnt material will be sent back to the facility of origin for further processing.

The installation facility is permitted to carry out the following activities:

- S5.4 A(1) (b) (iii) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.
- S5.4 A(1) (a) (ii) - Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.
- Storage of IBA waste prior to treatment.
- Storage of wastes recovered from the IBA treatment processes.
- Collection and treatment of wastewater prior to discharge via sewer, including storage of recovered sludge prior to offsite disposal.
- Storage of raw materials including fuel and lubrication oils.

The site is equipped with a moveable water cannon to suppress dusty emissions.

The site has an impermeable surface and a sealed drainage system. All wastewater flows to the on-site leachate treatment plant (LTP) prior to discharge to sewer. Sludge produced from the wastewater treatment plant is pumped straight from the LTP to a tanker for disposal at an appropriate facility.

The operator has an internal integrated Environmental Management System.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/XP3503PF/A001	Duly made 14/06/2019	Application for IBA treatment facility
Additional information received	26/09/219	Confirmation of site drainage, clarifications within dust management plan and additional best available techniques information.
Additional information received	14/10/2019	H1 assessment data.
Additional information received	21/10/2019	H1 assessment tool.
Permit determined EPR/XP3503PF (PAS Billing ref. XP3503PF)	24/12/2019	Permit issued to Rock Solid Processing Limited.
Variation application EPR/XP3503PF/V002	30/04/2024	Application returned as incomplete.
Environment Agency Non-hazardous Waste Sector Review Variation number EPR/XP3503PF/V003 (variation and consolidation)	15/05/23	Regulation 61 Notice requiring information for Statutory review of the permit against Waste Incineration BAT Conclusions published 12 December 2019 - documents received in response to the Regulation 61 Notice dated 14/04/2023, including documents titled 'BATC Return Spreadsheet V1.5', 'South West Sampling Results' and 'Discharge Consent Hill Barton (17-9-209)'.
Regulation 61 notice – response to Request for Further Information (RFI) dated 16/05/2024	31/05/24	Email containing responses to questions 1 - 8 of the RFI, including the documents titled 'HB Drainage Drawing' and 'HB Dust Monitoring_Results_Final'.
Variation issued EPR/XP3503PF	11/03/25	Varied and consolidated permit issued.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/XP3503PF

Issued to

Rock Solid Processing Limited (“the operator”)

whose registered office is

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

company registration number **10499394**

to operate a regulated facility at

**Hill Barton IBA
Hill Barton Business Park
Blackmore Road
Exeter
EX5 1BA**

to the extent set out in the schedules.

The notice shall take effect from 11/03/2025.

Name	Date
Peter Maksymiw	11/03/2025

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions and tables have been added/varied/deleted as a result of the Environment Agency Initiated Variation:

- Condition 2.5.1 of the previous permit variation has been deleted because the pre-operational condition has been completed.
- Condition 3.2.2 has been added because it is a relevant condition which will allow the Environment Agency to request for an amendment to the emissions management plan. The follow-on condition has been renumbered.
- Condition 3.5.1 (b) and (c) have been added to implement the process and ambient air monitoring requirements introduced by this variation.
- Conditions 3.5.3 and 3.5.4 have been added because they are relevant to the monitoring requirements in Condition 3.5.1.
- Conditions 4.2.2 (b) and (c) have been amended to refer to the appropriate tables.
- Condition 4.2.3 has been added because it is a relevant installation condition. The follow-on conditions have been renumbered.
- Table S1.1 as referenced in Condition 2.1.1 has been amended to clearly define the activities that are undertaken at the site, to apply relevant restrictions to them and to add activity AR4.
- Table S1.2 as referenced in Conditions 2.3.1 and 2.3.2 has been added to incorporate operating technique documents submitted in response to the Regulation 61 Notice.
- Table S1.3 as referenced in Condition 2.4.1 has been amended to mark the completed improvement conditions (IC1 – IC3) and include the new improvement conditions - IC4, IC5, IC6 and IC7.
- Table S1.4 as referenced in Condition 2.5.1 of the previous permit variation has been deleted because the pre-operational condition has been completed.
- Table S3.1 as referenced in Conditions 3.5.1 (a) and 3.5.4 has been amended to include parameters and limits specified in the Waste Incineration BAT Conclusions emission to sewer.
- Table S3.2 as referenced in Conditions 3.5.1 (b) and 3.5.4 has been added for process monitoring of moisture content, pH and conductivity.
- Table S3.3 as referenced in Conditions 3.5.1 (c) and 3.5.4 has been added for ambient air monitoring of dust emissions.
- Table S4.1 as referenced in Conditions 4.2.3 (a) and (b) has been added to implement reporting requirements for channelled emission, process and ambient air monitoring. The follow-on tables have been renumbered.
- Table S4.4 as referenced in Conditions 4.2.2 (c) and 4.2.3 (b) has been amended to include relevant forms.
- Schedule 5 as referenced in Conditions 4.3.2 and 4.3.4 has been amended by adding a new paragraph (c) to Part A requiring notification of breach of permit conditions not relating to limits.
- Schedule 6 as referenced in condition 4.4.1 has been amended by adding additional interpretations that are relevant to the changes made as a result of this variation and by updating/deleting some of the existing interpretations.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/XP3503PF

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/XP3503PF/V003 authorising,

Rock Solid Processing Limited (“the operator”)

whose registered office is

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

company registration number **10499394**

to operate an installation at

**Hill Barton IBA
Hill Barton Business Park
Blackmore Road
Exeter
EX5 1BA**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Peter Maksymiw	11/03/2025

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 Waste shall only be accepted if:

- (a) it is of a type and quantity listed in schedule 2 table S2.2; and
- (b) it conforms to the description in the documentation supplied by the producer and holder.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1;
 - (b) process monitoring specified in table S3.2; and
 - (c) ambient air monitoring specified in table S3.3.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

- (i) off-site environmental effects; and
- (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and

- (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
 - Where the operator is a registered company:
 - (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
 - Where the operator is a corporate body other than a registered company:
 - (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.
 - In any other case:
 - (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
 - (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately" in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.4 A(1) (b) (iii) Recovery of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.	R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic materials.	From receipt of permitted incinerator bottom ash (IBA) waste through to treatment and recovery of incinerator bottom ash aggregate (IBAA). Treatment consisting only of crushing, screening and separation of IBA for recovery as IBAA. Treatment shall be carried out in an enclosed building and on an impermeable surface with a sealed drainage. There shall be no channelled emissions to air from this activity. Waste types as specified in table S2.2
AR2	S5.4 A(1) (a) (ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment	D9 - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12	Treatment of site generated wastewater prior to discharge to sewer under trade effluent consent. Treatment shall be carried out on an impermeable surface with a sealed drainage.
Directly Associated Activity			
AR3	N/A	Storage of waste IBA prior to treatment R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced).	From receipt of waste to transfer to the treatment processes. Storage of IBA shall be on an impermeable surface with a sealed drainage system. Waste stored under this activity shall not exceed 35,000 tonnes at any one time. There shall be no channelled emissions to air from this activity. No waste shall be stored for more than 12 months. Waste types as specified in Table S2.2.
AR4	N/A	Storage of recovered incinerator bottom ash aggregate (IBAA) and	From recovery of waste to despatch off-site for use.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
		<p>residual waste after treatment</p> <p>R13: Storage of waste pending the operations numbered R1, R4 and R5 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Storage of IBAA, ferrous and non-ferrous metals, and residual waste shall be on an impermeable surface with a sealed drainage system.</p> <p>IBAA stored under this activity shall not exceed 5,000 tonnes at any one time.</p> <p>Other residual waste stored under this activity shall not exceed 500 tonnes in total at any one time.</p> <p>There shall be no channelled emissions to air from this activity.</p> <p>No waste shall be stored for more than 12 months.</p>
AR5	N/A	<p>Storage of site derived wastewater prior to treatment, including storage of recovered sludge prior to offsite disposal</p> <p>D15 Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p>	<p>Storage of wastewater and sludge shall be on an impermeable surface with a sealed drainage system.</p>
AR6	N/A	Raw material storage	From the receipt of raw materials to despatch for use within the facility.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/XP3503PF/A001	Part B2 and B3 of the application and all supporting documents, including: Fugitive Emissions Risk Assessment and Management Plan (January 2018, V1)	Duly Made 14/06/2019
Response to Schedule 5 Notice dated 29/08/2019	Response to question 2 clarifying dust management measures Response to question 4 detailing additional information for the best available techniques assessment.	26/09/2019
Response to regulation 61 notice EPR/XP3503PF/V003	Documents titled 'BATC Return Spreadsheet V1.5', 'South West Sampling Results' and 'Discharge Consent Hill Barton (17-9-209)'.	15/05/2023
Response to regulation 61 notice EPR/XP3503PF/V003 - Additional information received in response to the RFI dated 16/05/2024	Email containing response to questions 1 - 8 of the RFI, including the documents titled 'HB Drainage Drawing'.	31/05/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC 1	Provide an 'as built' drainage plan to show the position of all drainage and water treatment features.	Completed.
IC 2	Provide a report detailing the results of dust monitoring completed and any remedial actions required.	Completed.
IC 3	Confirm the results of the investigation into water re-use on site.	Completed.
IC4	<p>The operator shall submit a revised Dust Management Plan (DMP) to the Environment Agency for approval.</p> <p>The revised plan shall include an assessment of the risk of dust pollution associated with the permitted site operations, including</p> <ul style="list-style-type: none"> • a review of the loading, unloading and material handling procedures especially those that are used in transferring waste at the site. • waste storage and treatment procedures for the site. <p>The plan shall also include details of the monitoring locations, procedure for assessing optimum moisture ranges, including information on moisture monitoring method and frequency for the IBA and IBAA. The monitoring methods may include for example, the use of moisture probes or dry/wet analysis or any other alternative methods that are suitable for establishing the optimum moisture range for effective dust emission control.</p> <p>The plan shall take into account the appropriate measures for dust control specified in the <u>Non-hazardous and inert waste: appropriate measures for permitted facilities</u> guidance and <u>Control and monitor emissions for your environmental permit</u>.</p>	11/09/25

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	Once the DMP is approved by the Environment Agency, the operator shall carry out site operations in accordance with the approved DMP, and any subsequent revisions agreed in writing by the Environment Agency.	
IC5	<p>The operator shall undertake a review of the areas of the site that are currently covered by an impermeable surface and sealed drainage systems and shall submit a report to the Environment Agency for approval.</p> <p>The review shall ascertain their state and determine if the design and construction of the impermeable surface and sealed drainage systems are in line with or equivalent to the standards required in CIRIA Report C736.</p> <p>The report of the review shall be certified by a suitably qualified engineer and submitted with details of any improvements.</p>	11/09/25
IC6	Following the completion IC5, the operator shall implement the improvement measures by the deadline specified in this improvement condition unless otherwise agreed in writing with the Environment Agency. The improvements may include, but are not limited to, the installation of a new impermeable surface, sealed drainage and containment systems.	11/09/26
IC7	<p>The operator shall provide an updated copy of the site layout plan to the Environment Agency. The site layout plan(s) must show:</p> <ul style="list-style-type: none"> ▪ the locations of your waste storage and treatment activities, including screeners, crusher, and other plants associated with IBA treatment operations. ▪ the extent of the impermeable surface. ▪ the locations of emission control measures. ▪ the location and direction of flow of your drainage including the emission and monitoring points. ▪ the locations of dust monitoring points ▪ the locations of nearby receptors. 	11/05/25

Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
Coagulant	N/A
Polymer flocculant	N/A
Carbon dioxide	N/A

Maximum quantity	100,000 tonnes per year
Waste code	Description
19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 01	wastes from incineration or pyrolysis of waste
19 01 12	bottom ash and slag other than those mentioned in 19 01 11

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
At the location marked S10 on site drainage plan reference 8587/10802 (dated 01/06/2023)	Waste water from the site effluent treatment plant derived from the IBA storage and treatment processes	Total organic carbon (TOC)	No Limit set	Flow proportional composite sample over discharge duration, or spot sample if the discharge is mixed and homogeneous	Monthly or otherwise bi-annually if agreed in writing by the Environment Agency	EN 1484
		Total suspended solids	No Limit set			EN 872
		Lead	0.06 mg/l			EN ISO 1188 5, EN ISO 1729 4-2 or EN ISO 1558 6
		Ammonium – nitrogen (NH ₄ -N)	No Limit set			EN ISO 11732 or EN ISO 14911
		Chloride (Cl ⁻)	No Limit set			EN ISO 10304-1 or EN ISO 15682
		Sulphate (SO ₄ ²⁻)	No Limit set			EN ISO 10304-1
		Dioxins/Furans (I-TEQ)	No Limit set		Bi-annually	BS ISO 1807 3

Table S3.2 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the IBA and IBAA waste stockpiles and other locations agreed in accordance with the approved Dust Management Plan required under IC4	Moisture content	As agreed under the dust emissions management plan and the updated version required under IC4	As agreed under the dust emissions management plan and the updated version required under IC4	--

Table S3.2 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the location marked S10 on site drainage plan reference 8587/10802 (dated 01/06/2023)	pH	Flow proportional composite sample over discharge duration, or spot sample if the discharge is mixed	BS ISO 10523	-
	Conductivity		EN 27888	-

Table S3.3 Ambient air monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
At the locations agreed in accordance with the approved Dust Management Plan required under IC4	Dust	Daily	<u>Monitoring emissions to air, land and water (MCERTS) - GOV.UK</u> (Specific guides for air)	Monitoring methods, trigger levels and actions as specified in approved dust emissions management plan required under IC4
	Visual dust checks	Daily		

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to sewer Parameters as required by condition 3.5.1	At the location marked S10 on site drainage plan reference 8587/10802 (dated 01/06/2023)	Every 12 months	1 January
Process monitoring Parameters of dust, pH and Conductivity as required by condition 3.5.1	At the IBA waste stockpiles shown and other locations agreed in accordance with the approved Dust Management Plan required under IC4	Every 6 months	1 January, 1 July
	At the location marked S10 on site drainage plan reference 8587/10802 (dated 01/06/2023)	Every 12 months	1 January
Ambient air monitoring Parameters as required by condition 3.5.	At the locations agreed in accordance with the approved Dust Management Plan required under IC4	Every 6 months	1 January, 1 July

Table S4.2 Annual production/treatment	
Parameter	Units
Incinerator bottom ash received	tonnes
Incinerator bottom ash aggregate recovered	tonnes
Ferrous metals recovered	tonnes
Non-ferrous metals recovered	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³ per tonne of processed ash
Energy usage	Annually	MWh per processed ash
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Sewer	Form sewer 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Point Source emissions to sewer	Emissions to Sewer Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Process monitoring	Process Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Ambient air monitoring	Ambient Air Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Waste returns	E-waste return form	

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“bottom ash” means ash falling through the grate, transported by the grate.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to the Waste Framework Directive.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system.
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged to foul sewer.

“separation” means separating wastes into different material types, components and grades.

“sorting” means sorting that may be undertaken by hand or machinery. Sorting enables materials to be processed and recycled appropriately. It may involve separation of different waste types or the separation of different metal types including different ferrous metals, non-ferrous metals and non-metallic materials (e.g. paper and plastic). The sorted metals are graded by visual inspection, supplemented by chemical and other laboratory tests. The physical sorting may be assisted by conveyors and electromagnets.

“Waste code” means the six-digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

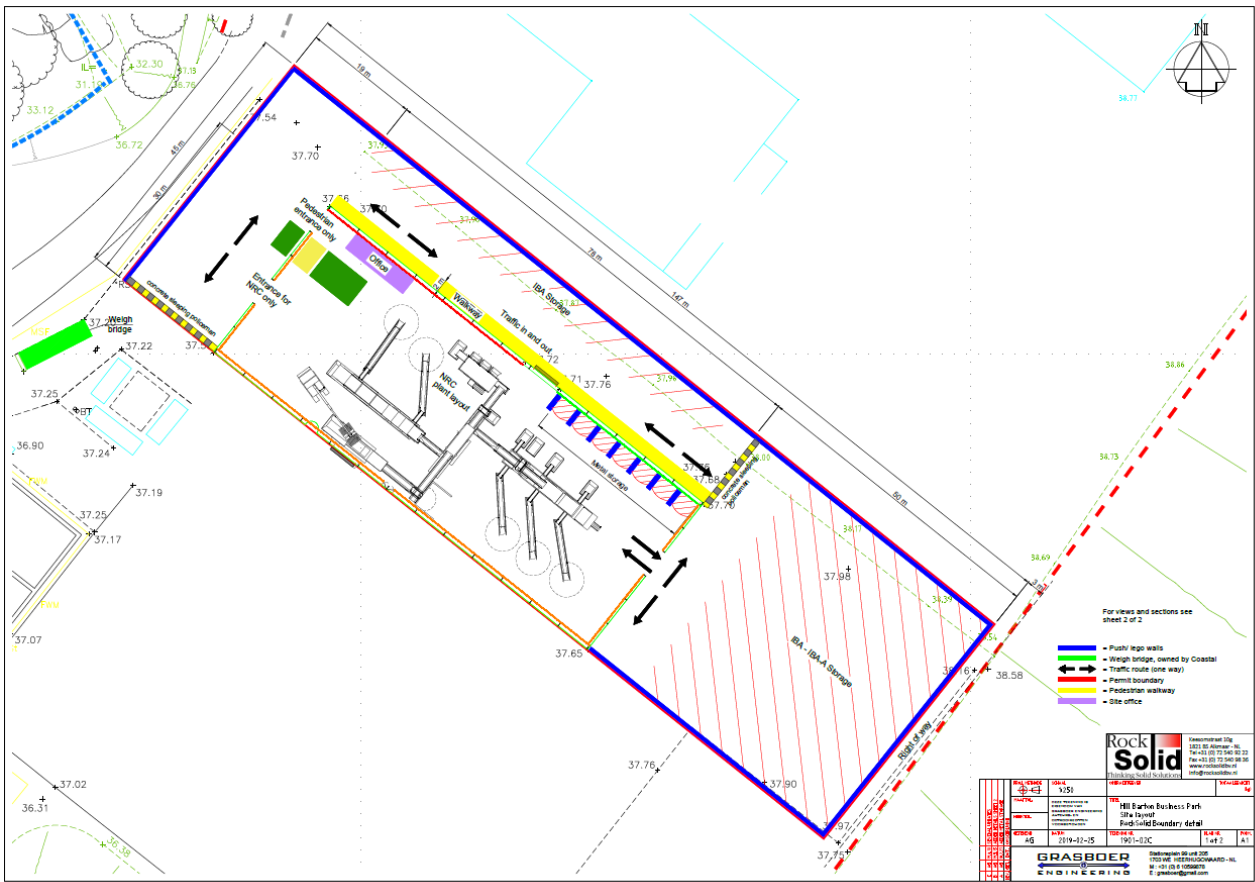
“year” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 – Site plan



END OF PERMIT

Reporting Forms

Process Monitoring Form

Permit Number: EPR/XP3503PF

Operator: Rock Solid Processing Limited

Facility: Hill Barton IBA

Process Monitoring Form: version 1, 08/03/2021

Reporting of process monitoring for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Monitoring point description or source	Parameter	Reference period	Test method ¹	Result ²	Sample dates and times ³	Uncertainty ⁴
<i>[e.g. Condenser V 2345]</i>	<i>[e.g. cooling water outlet temperature]</i>	<i>[e.g. instantaneous]</i>	<i>[if applicable]</i>	<i>[State result]</i>	<i>[State relevant dates and time periods]</i>	<i>[if applicable]</i>

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- ¹ Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- ² Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- ³ For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- ⁴ Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

Ambient Air Monitoring Form

Permit Number: EPR/XP3503PF

Operator: Rock Solid Processing Limited

Facility: Hill Barton IBA

Ambient Air Monitoring Form: version 1, 08/03/2021

Reporting of monitoring ambient air for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Monitoring point	Substance / parameter	Compliance limit	Reference period	Test method ¹	Result ²	Sample dates and times ³	Uncertainty ⁴
<i>[e.g. P1]</i>	<i>[e.g. PM₁₀ suspended particulate matter]</i>	<i>[e.g. 50 µg/m³]</i>	<i>[24 hour average]</i>	<i>[e.g. BS EN 12341:2014]</i>	<i>[State result]</i>	<i>[State relevant dates and time periods]</i>	<i>[State uncertainty if not 95% confidence interval]</i>

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- ¹ Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- ² Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- ³ For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- ⁴ Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

Water Usage Reporting Form

Permit Number: EPR/XP3503PF

Operator: Rock Solid Processing Limited

Facility: Hill Barton IBA

Water Usage Reporting Form: version 1, 08/03/2021

Reporting of water usage for the year [YYYY]

Water source	Water usage (m ³)	Specific water usage (m ³ /unit) ²
Mains water	<i>[insert annual usage in m³ where mains water is used]</i>	<i>[insert annual usage in m³/unit where mains water is used]</i>
Site borehole	<i>[insert annual usage in m³ where water is used from a site borehole]</i>	<i>[insert annual usage in m³/unit where water is used from a site borehole]</i>
River abstraction	<i>[insert annual usage in m³ where abstracted river water is used]</i>	<i>[insert annual usage in m³/unit where abstracted river water is used]</i>
Other – <i>[specify other water source where applicable. Add extra rows where needed]</i>	<i>[insert annual usage in m³ where applicable]</i>	<i>[insert annual usage in m³/unit where applicable]</i>
Total water usage	<i>[insert total annual water usage in m³]</i>	<i>[insert total annual water usage in m³/unit]</i>

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual water usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

Energy Usage Reporting Form

Permit Number: EPR/XP3503PF

Operator: Rock Solid Processing Limited

Facility: Hill Barton IBA

Energy Usage Reporting Form: version 1, 08/03/2021

Reporting of energy usage for the year [YYYY]

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) ²
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	<i>[insert annual consumption in MWh/unit where natural gas is used]</i>
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	<i>[insert annual consumption in MWh where gas oil is used]</i>	<i>[insert annual consumption in MWh/unit where gas oil is used]</i>
Imported heat	<i>[insert annual consumption in MWh where heat is imported]</i>	<i>[insert annual consumption in MWh/unit where heat is imported]</i>
Other – <i>[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>[insert annual consumption in MWh where applicable]</i>	<i>[insert annual consumption in MWh/unit where applicable]</i>
Electricity exported	<i>[insert annual production in MWh where electricity is exported]</i>	Not applicable
Heat exported	<i>[insert annual production in MWh where heat is exported]</i>	Not applicable

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual energy usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

¹ Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

² Divide energy consumption by an appropriate unit of raw material processed or waste output.

Other Performance Parameters Reporting Form

Permit Number: EPR/XP3503PF

Operator: Rock Solid Processing Limited

Facility: Hill Barton IBA

Other Performance Parameters Reporting Form: version 1, 08/03/2021

Reporting of other performance parameters for the period from [DD/MM/YY] to [DD/MM/YY]

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>

Operator's comments

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report the performance parameters (other than water and energy) required by your permit. Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.