



SITE CLOSURE PLAN

Donald Ward Limited

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Summary

- S.1 Donald Ward Limited ('Ward') recognise that operations during the life of the Environmental Permits they hold-including decommissioning and closure- should not lead to any deterioration of the condition of the site. Ward have prepared this Site Closure Plan, in order to meet the requirements of their Environmental Permits.
- S.2 This generic Site Closure Plan has been produced to cover all waste treatment and recovery operations currently undertaken by Ward. Activities undertaken at Ward sites are broadly similar, therefore this plan can be considered applicable to all operations.
- S.3 This Site Closure Plan will be maintained by Ward and updated as circumstances change, for example, should there be any process changes or change of land use that require any additional considerations to be included in the plan. Any revisions shall be submitted to the Environment Agency as appropriate.
- S.4 The Environment Agency will be informed in writing of the date of cessation of activities on any site. This will enable the Environment Agency to inspect the site, approve the closure and to agree the actions that will need to occur following closure.

1 Introduction

- 1.1 The Site Closure Plan ensures that Ward can meet the obligations of their environmental permits for the company's waste treatment and recovery operations. These operations include but are not limited to metal recovery and recycling, End- of-Life Vehicle (ELV) treatment, Waste Electrical and Electronic Equipment (WEEE), SRF and RDF treatment facilities and waste transfer and treatment.
- 1.2 This Site Closure Plan follows all the requirements set out in section 2.11 of the Environment Agency Guidance Note EPR 5.06 as well as the Environment Agency guidance; 'How to comply with your environmental permit'. The document details how the sites will be decommissioned to return them to a satisfactory state upon the cessation of activities.
- 1.3 A detailed plan for the decommissioning or closure of the site, or part thereof is included. This plan shall be periodically reviewed or when any changes occur, for example, if there are any modifications to the current activities or if operational or material changes occur.
- 1.4 The successful implementation of this plan will enable the company to verify that there will be no continuing risk to the environment as a result of decommissioning the waste facilities.

2 Scope of the Closure Plan

- 2.1 This closure plan applies to all sites operated by Ward which have an Environmental Permit.
- 2.2 The Closure plan sets out the actions that will be taken during decommissioning of the site to avoid any pollution risk and to return to a satisfactory condition.
- 2.3 Ward waste facilities are located throughout the UK. Some of the land on which the facilities are located is leased and some is owned by the company. In addition, in some cases, the plant equipment used may also be leased. For sites where land and/or equipment is leased, Ward will liaise with the relevant landowner/lessor to ascertain responsibilities for undertaking the site closure activities outlined in this closure plan.

3 Process Description

- 3.1 Ward waste facilities vary in their overall capacities, physical size, treatment and recovery methods used. However, many of the methods adopted require similar plant and equipment and the company adopts the same management approach at each of the sites.
- 3.2 The sites receive direct deliveries of hazardous and non- hazardous wastes and enable the recovery of a variety of materials, including plastics, metals, WEEE, ELVs, ELFs, wood, construction & demolition and industrial & municipal wastes.
- 3.3 The waste recovery and treatment facilities will consist of some or all of the following process units, plant and equipment, which is either located internally within buildings or externally:
- ❑ Delivery and storage areas;
 - ❑ Raw material storage;
 - ❑ Hazardous waste storage facilities (e.g. for oils, fuels, batteries etc.);
 - ❑ Waste containers/skips (e.g. for metals, plastics, glass etc.);
 - ❑ Hoppers;
 - ❑ Conveyor belts;
 - ❑ De-pollution equipment;
 - ❑ Large automated plant and equipment (i.e. shredders, granulation, magnets, eddy current separators, drum screens, sieves, shears, baling machines, trommels);
 - ❑ Manually fed equipment;
 - ❑ Dust extraction equipment;
 - ❑ Water sprays;
 - ❑ Storage tanks;
 - ❑ On- site vehicles (e.g. material scrap handlers, loading shovels, forklift trucks);

- ❑ Ductwork and pumps;
- ❑ Computer Controls;
- ❑ Weighbridges;
- ❑ Sealed drainage systems;
- ❑ All associated ancillaries, including car parks and road areas.

- 3.4 The facilities are provided across the UK to help to meet the demands of the waste recycling and recovery market, including End of Life Vehicles, End of Life Fridges, metals and plastics recycling, WEEE recycling and recovery, RDF and SDF production, wood recycling, waste transfer and treatment. Wastes are delivered directly into the sites' delivery areas by customers and/or Ward.
- 3.5 From the delivery areas, the wastes are transferred to the processing areas where they are treated in accordance with the local methods. All recyclable and hazardous components are removed and stored in waste segregation areas. Programmes have been developed and implemented at Ward sites to ensure that wastes are stored on impermeable pavements, which are impervious to the substances stored on them.
- 3.6 Depending on the site and the equipment and methods used, wastes are sorted using hoppers, conveyors, magnets, sieves, screens etc. and segregated in accordance with the site's procedures and Permit requirements. Wastes are segregated according to type.
- 3.7 The residual materials arising from the recovery and treatment facilities will either be disposed of to landfill, where there is no alternative, or directed to facilities for further treatment and recovery.
- 3.8 The impermeable areas are also connected to sealed drainage systems, which are maintained to ensure the integrity of these is not compromised.

4 Operation & Decommissioning

- 4.1 During the operation of the waste facilities, activities shall be undertaken in a manner which shall not lead to deterioration in the condition of the sites. Where applicable, systems are in place in accordance with best available techniques (BAT) as specified in the relevant sector guidance note EPR 5.06 [Ref. 2] as well as in general guidance contained within 'How to Comply with your Environmental Permit' [Ref. 3] and Environmental Permitting Core Guidance [Ref. 7]. This is to ensure that should any instances arise which have, or might have, impacted on the state of any of the sites they are recorded, together with any further investigation or remediation work carried out. In addition, other relevant guidance, including Best Available Treatment, Recovery and Recycling Techniques (BATRRRT) and Treatment of WEEE [Ref. 4] and Environmental Permitting Guidance on the WEEE Directive [Ref. 5] and the End-of-Life Vehicles (ELV) Directive [Ref.6] shall be used (as applicable) during the lifetime of each of the waste facilities to ensure that the methods used to handle the wastes are appropriate.
- 4.2 Consideration of the decommissioning risks shall be given at the design stage for all future development. Steps will continue be taken to ensure that decommissioning and dismantling activities can be undertaken in an efficient a way as possible, for example, by ensuring that plant can be decommissioned whilst maintaining activities at the facility for as long as possible. Care shall be taken at all stages of closure to ensure that the decommissioning activities do not cause a nuisance or annoyance to any receptors in the vicinity of the site (e.g. residential buildings, schools, hospitals, recreation areas etc.).
- 4.3 During the operational life of the facilities, the placement of new vessels and underground pipe work will be avoided where possible. Should these be necessary all such plant and equipment will be adequately protected by secondary containment and/or a suitable monitoring programme.
- 4.4 When the decision to close one or more sites has been made, Ward will assemble a team of competent persons as required, to assist in managing the phased closure and decommissioning of the site(s).

- 4.5 Upon cessation of activities at sites, Ward shall review the scope of this Site Closure Plan and, where required, will supplement it with a more detailed site specific plan. This will ensure that all activities, plant and equipment have been considered and that detailed methodologies for the removal of hazards are available where necessary.
- 4.6 Upon closure, the approach to be taken by the company will be dependent on the business drivers for ceasing operations. The company will take appropriate actions, which will depend on its circumstances at that time. Where complete decommissioning cannot be avoided, the company will activate this site closure plan to ensure that the site and its facilities are rendered safe and that the environmental risk is reduced to a minimum. Part of this process may require the transfer of equipment to another Ward facility and/or the sale of some plant and equipment.

5 Decommissioning of Site

- 5.1 The following table describes the generic issues that will be considered as part of the decommissioning process. The main process areas have been broken down into units to describe the potential hazards and pollution risks as well as the actions necessary for the safe decommissioning of the site. This should be read in conjunction with section 7, Site Closure Operations, which describes in more detail how pollution risks will be removed from the sites.

Processes/ Activities	Plant and Equipment (examples)	Contents/ Hazardous Materials/ Other hazards	Actions for Safe Decommissioning and Likelihood of Pollution
Waste Receipt	☐ Waste Storage Area ☐ Waste delivery vehicles	☐ Possible contamination of soil and/or groundwater with hazardous wastes/liquids due to a lack of integrity of impermeable pavement (i.e. cracks). ☐ Stockpiles of wastes will require treatment/removal.	☐ Impermeable pavements inspected during operational phase to check for cracks or other damage to maintain integrity; ☐ Waste deliveries to be stopped in advance of cessation of activities; ☐ All stored wastes to be subject to the recovery/ treatment plant where possible in advance of decommissioning to maximise the use of the facility; ☐ Residual materials and/or unacceptable wastes to be disposed of.
Mechanical Waste Processing	☐ Feeding Lines ☐ Hoppers ☐ Shredders ☐ Granulation ☐ Drum Screens ☐ Conveyor Belts ☐ Sieves ☐ Over Belt Magnets ☐ Separators ☐ Shears ☐ Dust Extraction Equipment ☐ Water sprays (washing, separating)	☐ Any polluting materials which are used and stored in the area may have leaked or spilled during their use; ☐ The plant and equipment will contain residual waste materials; ☐ Plant will require disposal/ dismantling following the cessation of activities and following cleaning; and ☐ Wastes (inc. recyclables) will require removal from site. ☐ Final products (i.e. reprocessed metals, plastics etc.) required to be sold	☐ Plant and equipment to be cleaned to remove residual waste materials; ☐ All plant and equipment and surfaces to be thoroughly cleaned to remove residual waste: ☐ Isolate all equipment and either store for reuse, transfer to another suitable facility or, where neither of these options are possible, disposed of at an authorised facility; ☐ Where appropriate, plant and equipment to be sold; ☐ All waste, including dust and residual wastes, will require removal from site. Wherever possible, wastes will be recycled using authorised contractors; ☐ Waste water to be appropriately disposed of ☐ All electrical equipment to be isolated; ☐ Integrity of concrete pavement areas to be checked; ☐ Surfacing comprised of concrete pavement therefore

Processes/ Activities	Plant and Equipment (examples)	Contents/ Hazardous Materials/ Other hazards	Actions for Safe Decommissioning and Likelihood of Pollution
	☐ Computer controls ☐ Storage tanks ☐ On- site vehicles (e.g. loading shovels, forklift trucks).	☐ Hazardous materials arising from equipment will require removal from site (e.g. waste oils, batteries, fuels etc.) ☐ Dust (extracted from abatement equipment) will require disposal	pollution is unlikely. ☐ All wastes and raw materials in tanks, containers/skips will be removed from site. Wastes will be sold and recycled wherever possible.
Waste Handling and Storage	☐ Sorting/picking lines ☐ Storage tanks/Skips /containers ☐ On- site vehicles (e.g. loading shovels, forklift trucks); ☐ Computer controls; ☐ Waste storage areas ☐ Drainage Systems/ Interceptors	☐ Plant and equipment may contain waste residues which will require removal from equipment; ☐ Separated waste fractions will require removal; ☐ Electrical equipment will require isolation; ☐ Any hazardous materials which have been treated/processed and stored in the area may have leaked or spilled during their use; ☐ Plant will require disposal/ dismantling following the cessation of activities and following cleaning. ☐ Interceptors will need emptying	☐ Integrity of the concrete pavement to be checked; ☐ All plant and equipment to be thoroughly cleaned to remove residual waste: ☐ All wastes in the containers/skips will be removed from site. Wastes will be sold and recycled wherever possible; ☐ Isolate all equipment and either store for reuse, transfer to another suitable facility or, where neither of these options are possible, disposed of at an authorised facility; ☐ Where appropriate, plant and equipment to be sold; ☐ Surfacing comprised of concrete pavement therefore pollution is unlikely; ☐ Interceptors and drainage systems to be cleaned. Residues to be disposed of at a suitably authorised facility.
Associated	☐ Areas used by cars	☐ Drains and interceptor(s) will	☐ Integrity of all concrete pavement to be checked;

Processes/ Activities	Plant and Equipment (examples)	Contents/ Hazardous Materials/ Other hazards	Actions for Safe Decommissioning and Likelihood of Pollution
Equipment and Ancillaries and Car Parking and Road Areas	and waste delivery vehicles ☐ Refuelling facilities ☐ Interceptor(s) and drainage systems ☐ Weighbridges ☐ Sewage Treatment Plants/Cess Pits	require cleaning and emptying; ☐ Refuelling facilities to be dismantled and de-polluted (e.g. emptied, cleaned) and removed from site. ☐ Potential for hazardous wastes (e.g. oil contaminated wastes from cleaning up any spillages that have occurred) that will require disposal	☐ All wastes remaining to be removed by licensed contractors; ☐ Surfacing comprised of concrete pavement therefore pollution is unlikely; ☐ Drains and interceptor(s): hazardous content of any interceptor(s) to be disposed of to an authorised facility; ☐ Weighbridge and refuelling equipment to be isolated and either transferred to another suitable facility or sold as scrap;

6 Monitoring and Testing

- 6.1 Ward has an internal Environment Management System, therefore all necessary procedures to ensure the effective management of the collection and reporting of environmental monitoring data have been established. In addition, all sites have Operating Techniques documentation.
- 6.2 Where required emissions monitoring is undertaken and reported in accordance with relevant conditions set in the Environmental Permits.

Infrastructure Monitoring

- 6.3 The monitoring and control systems established within Ward management systems will ensure adequate infrastructure records are maintained.
- 6.4 All relevant plant and equipment are subject to regular inspection and maintenance in accordance with the manufacturer's recommendations. Plant and parts are replaced as required (based upon need and manufacturers specifications).

Testing

- 6.5 Where baseline and/or intrusive investigations have been undertaken (i.e. prior to site commissioning or during operation) the data from these shall be used to provide previous evidence of contamination of the ground and/or groundwater at the time of closure. In the event that such data is not available for a site which is to be decommissioned, intrusive data will be obtained at closure where appropriate and if deemed necessary.
- 6.6 Should the results of intrusive investigations indicate that the site is contaminated and that the contamination has occurred as a result of Ward activities, Ward will develop and implement plans to remediate the site to a satisfactory state. However, if Ward does not consider that the contamination has arisen from the site's activities, the company shall provide justification as to why this is the case, including details on how and why the contamination was likely to have been present prior to the commencement of the site operations authorised by the Permit.

7 Site Closure Operations

In order to demonstrate that the site will be left in a satisfactory state and that pollution risks have been removed, there are a number of issues that need to be considered. These are outlined below. The company's direct control over these issues will vary between sites, particularly when premises are leased and not owned. Due regard will be paid to agreements made with the landlord(s) and where activities undertaken at premises which are leased by Ward are to cease, the terms of each lease will be considered. The permitted activities will be decommissioned following a prescribed timetable which will be established upon the cessation of activities and may include some or all of the following elements.

Manufacturing Equipment and Facilities

7.1.1 Equipment Cleaning

All plant and equipment will be emptied and cleaned of all process/production materials. Appropriate cleaning procedures will be used to ensure that no residual product or wastes remain in the equipment that is likely to pose a threat to personnel and the environment.

7.1.2 Materials Removal

Upon cessation of activities, Ward will ensure that prior to plant closure the inventory of stored and in-process materials will be reduced (i.e. de-stocking will be performed). This will include all chemicals and oils. Where surplus stock cannot be fully utilised or waste cannot be processed prior to plant closure, it will be used or treated at other Ward sites or sold to other suitable operators wherever possible. If this is not possible, the company will try to return stock to the suppliers. As a last resort, stock shall be appropriately disposed of, paying due regard to all applicable waste legislation.

All potentially hazardous substances, such as oils, fuels and chemicals will be removed in such a way as to protect land and groundwater from potentially harmful contents. Furthermore, Ward will ensure, wherever practicable, that materials used in the decommissioning phase are recyclable (having due regard for operational and other environmental objectives).

7.1.3 *Plant and Equipment Decommissioning*

All plant and equipment will be decommissioned in an orderly manner and in accordance with the manufacturer's recommendations. Plant will be taken offline in a structured way so as to maintain waste reprocessing and treatment at the site for as long as possible. In the event that the plant and equipment is to remain on site for a prolonged period of time following decommissioning, the manufacturer's recommendations for its long term storage will be followed. In the event that the plant and equipment is to be transferred to another location or sold, it will be suitably disconnected, securely packaged up and sent offsite as soon as practicable. All plant and equipment that cannot be reused will be recycled wherever possible either as refurbished equipment (through a purchaser) or as scrap value. If the plant and equipment is leased by Ward, suitable arrangements will be made for it to be returned to the owner.

7.2 Utilities Equipment and Facilities

7.2.1 *Boiler Decommissioning*

Any boilers will be decommissioned in accordance with good engineering practice and the manufacturer's recommendations. They will be isolated from the fuel supply and prepared either for storage or for removal offsite.

The decommissioning process will include decontamination of any boiler and treatment of any wastewater as described for storage tank residues as listed in section 7.1.2 above.

7.2.2 *Electricity and Gas Supply Systems*

All systems shall be isolated from the main supply and shall be emptied to protect them from frost damage. The gas and electricity distribution systems and the transformers will be maintained in operation and placed under maintenance contract. The supply systems shall be identified and clearly marked before any demolition work begins and precautions taken to avoid damage to them.

7.2.3 *Firewater/Sprinkler System*

Where premises are fully owned by Ward, any firewater and sprinkler systems that are in use will be maintained in full operating status in order to protect any vacant buildings and other areas in the event of a fire. The systems will be placed under a maintenance contract with a specialist contractor to ensure that it remains fully

serviceable in the event of it being required. The necessary water systems will remain live in order to feed the firewater system and appropriate trace heating will be installed and/or localised building heating provided to ensure frost protection.

Where premises are leased and Ward will not have access rights upon closure, suitable arrangements will be made with the landlord(s) for the systems to be maintained and remain serviceable in the event of being required.

7.2.4 Drains and Interceptors

Ward will employ a suitably qualified and competent contractor to fully flush and clean all drainage systems to remove any debris and blockages. When all activities on site have ceased and there is no further risk of contamination, any interceptors shall be emptied and their contents disposed of at an authorised waste facility.

Drains shall be protected from the risk of contamination during any site demolition works. All contractors will be made aware of drainage system and discharge points to ensure that precautions are taken to prevent potentially polluting materials, including silty water, from entering the surface water drains.

The relevant Emergency Action Plan for each site include details of the actions to be taken in the event of potentially polluting substances entering drains. Such Plans shall be referred to and implemented at each site as necessary.

7.2.5 Water and Sewerage Supply and Discharges

All water systems that are not required to be left functional will be drained. Upon cessation of activities, Ward will also liaise with the local water authority to advise them of the closure of the site. Once activities have ceased, any discharges to sewer currently permitted under existing effluent discharge consents will no longer be made.

7.3 Waste Disposal

7.3.1 Hazardous Waste

All hazardous wastes listed as an “absolute” entry in the List of Wastes Regulations 2005) shall be disposed of or recovered at an authorised hazardous waste landfill site or recovery facility.

Wherever possible all wastes will be recycled or recovered rather than disposed of. Where practicable, wastes shall be directed to other Ward sites, including any residual wastes arising from the reprocessing and treatment activities, (e.g. oils, chemicals, fuel and batteries), as well as other wastes on site that will arise as a result of the decommissioning process (e.g. fluorescent tubes, waste oils, electrical equipment). All documentation relevant to the transfers of this waste shall be retained by Ward.

Where wastes are stored on site awaiting removal, they shall be stored in a secure container or compound to prevent unauthorised access and vandalism.

7.3.2 Non Hazardous Waste

All non hazardous wastes remaining on site at cessation of plant activities will be sorted and treated through the reprocessing/treatment plant wherever practicable. All recovered wastes including glass, metals, plastics and aggregates shall be managed in accordance with relevant legislation and guidance. Non hazardous wastes include all those that are not marked with an asterisk (*) in the List of Wastes (LoW) Regulations 2005. Where wastes form part of a mirror entry in the LoW, they will be assessed to determine whether they are hazardous or not and then be appropriately disposed of or recovered at authorised facilities.

All wastes produced as a result of demolition activities will be treated as inert where they meet the requirements for inert waste specified in the inert waste acceptance criteria. Recovery and recycling routes or methods for inert wastes will be identified and used wherever possible to minimise the quantities which are landfilled. Where

no such method can be found, the wastes will be sent to an inert landfill site for final disposal.

Wherever possible all wastes will be recycled or recovered rather than disposed of to landfill.

7.4 Contractor Management

7.4.1 During decommissioning, Ward may appoint (a) specialised contractor(s) for the decommissioning of its permitted activities, including the remediation of any contaminated operational areas. However, some of these decommissioning activities may be undertaken by Ward personnel. If using contractor(s), they will be suitably qualified to ensure safe removal of all plant and associated wastes. A method statement for the removal of potentially contaminated plant and land will be produced by any contractors used, which will be approved by Ward Health and Safety Team and appropriate senior management, prior to commencement.

7.4.2 All contractors and/or Ward personnel involved in the decommissioning activities will consider the management of site operations such as the import, storage and handling of materials and substances on site and the export of material from site. Importance will also be given to the location of storage compounds, and the quantities of oil, fuel and chemicals on site will be kept to the minimum required.

7.4.3 A dedicated plant wash down area will be designated for use by contractors and/or personnel undertaking the decommissioning works. This shall not be located in the vicinity of any surface water drains. Cleaning will only be permitted in the designated area. All wash waters shall either be recycled or fully contained and treated prior to disposal. This water shall either be disposed of to foul sewer with written consent from the relevant sewer undertaker or disposed of as hazardous waste.

7.4.4 All contractors involved in plant decommissioning will be appropriately supervised by suitably competent Ward employees.

7.5 Soil and Groundwater Contamination

7.5.1 Upon cessation of the site activities, consideration shall be given to available monitoring data and maintenance and inspection records for the site in determining whether intrusive investigations to collect surrender data are necessary. Where it is deemed to be necessary surrender data will be obtained from soil and groundwater samples at strategic locations around the site. The locations of sample points will be

chosen according to where there is considered to be a high risk of pollution having occurred. This could include areas of the site where the surface is not comprised of impermeable pavement, where there is known to have been a number of incidents of spillage or where hazardous wastes have been stored or handled. The locations of previous sample points will also be considered and if investigations were undertaken when the permit application was submitted (baseline data), samples from the same locations will be obtained in order to allow a comparison with the baseline. This will identify if the condition of the land has deteriorated over the lifetime of the permit. Any contamination that has occurred between the reference data and surrender data being obtained shall be remediated before the permit is surrendered.

7.5.2 If an investigation is required, Ward shall appoint a specialised contractor to conduct the intrusive investigation at the site in order to obtain surrender data. The contractor will be suitably qualified to ensure safe and appropriate characterisation of potential contamination at the site(s) to be decommissioned. A method statement shall be supplied by the contractor and will be based upon the content of previous intrusive investigations.

7.5.3 The findings of any intrusive investigations will be evaluated in order to determine the best course of action for remediating any contaminated areas, making appropriate use of Soil Guidance Values (SGV) (assuming industrial use continues after restoration) will be used where appropriate. All contamination significance levels will be agreed with the Environment Agency and will be incorporated into applicable method statements. If excavations of potentially contaminated soil and concrete hard structure are deemed necessary during the decommissioning works, a suitably licensed waste contractor will be appointed.

7.6 Pre- Demolition Site Drainage Works

7.6.1 In planning any demolition work, precautions shall be taken to ensure the complete protection of water courses and groundwater against pollution.

7.6.2 Records of all subsurface structures shall be used to identify the locations of all pipe work, drainage systems and storage vessels in order that they are not disturbed. Suitable method statements shall be produced and implemented for the safe removal of subsurface infrastructure if this is required.

7.6.3 In advance of any demolition works, the layout of the drainage system shall be checked and, where necessary, manhole covers, gullies and grills on site shall be

repainted in the recognised colour- coding system (i.e. red for foul sewer drains and blue for surface water drains). As part of the induction training on arrival at the site, all contractors shall be provided with a copy of the drainage plan as well as notification of the locations of all spill clean- up and containment materials.

7.7 Site Closure Management

- 7.7.1 Photographs will be taken at each key stage of the decommissioning process in order to visually log progress.
- 7.7.2 The relevant site's Emergency Action Plan, which is available as part of the environment management system (EMS) shall be reviewed in advance of site closure. Copies of relevant documentation shall be provided to all contractors involved in the decommissioning activities and adopted during all stages of decommissioning. All Ward employees shall be aware of the requirements of the Plan and, in addition, all those to be involved in site closure activities, such as contractors, shall be made aware of its contents.
- 7.7.3 The number, contents and location of spill kits will be reviewed by Ward prior to the commencement of any decommissioning works. Additional kits/containment materials suitable for the types and quantities of hazardous substances stored on site will be made available to contractors.
- 7.7.4 Best practicable means (BPM) shall be used to prevent or minimise noise nuisance during the decommissioning activities on site as deemed necessary. Noise and vibration shall be taken into account when considering best available working methods and the selection of plant appropriate for the required works.
- 7.7.5 Prior to the commencement of and during any decommissioning activities on site methods for the control of fugitive emissions to air will be considered. Any potential releases shall be controlled using good housekeeping techniques wherever possible, however, where more substantial dust abatement measures are necessary the following techniques shall be applied throughout the duration of the decommissioning work, where applicable:
- Damping down on site during periods of dry weather;
 - Use of covered vehicles and skips for the transportation of materials to and from the site, which have the potential to cause dust or be deposited on public highways;

- Wheel washing of all heavy plant leaving the site and accessing the public highway, where necessary; and
- Use of the existing complaints procedure to record and investigate any complaints arising as a result of nuisance issues including dust and noise.

8 Restoration of the Site

- 8.1 Once a site has been decommissioned, the site shall be restored to a satisfactory state. Where baseline conditions are not available, the restoration methods to be implemented will be agreed with the Agency.
- 8.2 As part of the restoration process, all structures will be decommissioned using the methods outlined in section 6 above. All methods used will prevent or, where this is not possible, minimise pollution risk to the surrounding environment.

9 Access & Security

- 9.1 As during normal operating periods, it will be necessary to ensure that suitable access and security is provided during the decommissioning, demolition and restoration phases of work. As such, security provisions will be audited during these phases to ensure that the site is in a secure condition, that unauthorised access is avoided and that the site and any buildings on it do not present an unacceptable nuisance in the area.

10 Future Legislation & Regulation

- 10.1 The principles described in this Closure Plan will be followed and adapted to meet any future legislation and regulatory requirements that are pertinent at the time of closure.
- 10.2 As required a site condition report will be prepared. This will be submitted to the Environment Agency for approval.
- 10.3 When the decision has been made to close a facility, a site specific permit surrender application shall be submitted to the Environment Agency. This application will provide details of the measures taken to avoid pollution risk and demonstrate that the site has been returned to a satisfactory state. The application shall be submitted to allow sufficient time for it to be assessed prior to cessation of site activities.