

SITE DECOMMISSIONING AND MOTHBALLING

EOP 24

VERSION 3

08/01/2019

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1. SCOPE

1.1. This document applies to the Tunstead site including the Sapphire Shredding Facility, Hindlow, Ballidon and Doveholes Dale.

2. PURPOSE

2.1. The purpose of this procedure is to ensure compliance with the respective sites permit requirements during the decommissioning or mothballing of plant.

2.2. Where there is no specific reference to decommissioning in a site's permit, the good practices outlined in this document will be followed.

3. RESPONSIBILITIES

3.1. It is the responsibility of each Plant Manager to ensure adherence to this procedure.

4. DEFINITIONS

Decommissioning: the actions taken at the end of a facility's operational life to take it out of service with adequate regard for the health and safety of workers, the public and protection of the environment (reference: Health and Safety Executive).

Mothballing: the preservation of a production facility without using it to produce. Machinery in a mothballed facility is kept in working order so that production may be restored quickly if needed (reference: 'investopedia').

5. RELATED DOCUMENTS

Tunstead EPR Permit- XP3532DP

Sapphire Permit - XXXXXXXX

Hindlow EPR Permit- XP3134UZ

Doveholes Dale Non-hazardous Landfill Permit- PP3732UZ

Ballidon EPR (Part B) Permit- 107/3.5/C

6. PROCEDURE

6.1. Site Closure or Mothballing

6.1.1. In the event of a site or business unit closure or mothballing the Plant Manager is responsible for producing a 'Site Closure Plan'.

6.1.2. The 'Site Closure Plan' must be developed by a cross functional team and approved by the Plant Manager.

6.1.3. The 'Site Closure Plan' must take into consideration items listed in Table 1.
Note this list is not exhaustive.

6.1.4. Prior to the implementation of any part of the 'Site Closure Plan' the Environment Manager is responsible for providing at least 14 days notice to the relevant authority.

6.2. Mothballing of Equipment

6.2.1. If equipment is to be mothballed the Plant Manager is responsible for conducting and documenting an environmental risk assessment.

6.2.2. If the environmental risk assessment concludes there is a significant risk then measures should be put in place to reduce the risk.

6.2.3. If the risk remains high the Environment Manager is responsible for providing at least 14 days notice to the relevant authority.

Element	Approach
Unauthorised site access	Site/Area to be protected by secure fences and routes of access to be locked and secured. Access to the establishment and dismantled equipment is restricted to authorised persons only.
Minimise the risk to the environment	Specific site rules included within contracts. The on-site induction includes information on environmental protection which will be given to all contractors prior to start of work.
Vehicle suitability for material removal	Ensure all vehicles used for the removal of materials from the site are suitable in terms of their size, design, construction and hazard identification markings.
Suitability of access and loading/unloading areas	All access, transfer and loading/unloading areas are to be assessed in conjunction with contractors as to their suitability such as gradient and stability for the vehicles, equipment and purposes intended.
Ground and water protection	Where materials are being removed, transported and handled consideration will be given to the need for protective measures such as drain covers.
Waste disposal	All wastes to be clearly identified (chemical analysis if appropriate), appropriately packaged and correctly disposed of in accordance with the relevant legislation and company/departmental procedures.
Asbestos containing material within and/or on buildings and plant	See appropriate HSIP.
Disposal of surface deposits and stockpiles	All waste to be loaded for disposal by an appropriate method (dependent upon hazards of material and quantities) and taking account of possible dust creation. Disposed of according to relevant legislative controls and site procedures.
Emptying of material storage areas	Prior to dismantling or demolition, as much of the chemicals as possible must be removed from the establishment by sale or disposal. Special attention should be given during the loading process to the material, hazard characteristics and its classification with regard to disposal.
Safe disconnection of services	All electrical services to be locked off and disconnected. All gas connections to be purged and locked off. All compressed air lines to be disconnected, ensuring no residual pressure is left within the lines. All oil lines to be drained out (see 'flushing of pipelines').
Location and emptying of all pipe work	All pipe work to be identified and drained down to allow for careful dismantling and cleaning (see 'decontamination'). This should be done in such a way as to control the flow of material from the pipeline and allow for

	safe and appropriate disposal.
Plant and vehicle wheel washing	Where necessary all plant and vehicles will undergo wheel washing to prevent the spread of contaminants. Wastewater from the cleaning and debris from dismantling and demolition will be treated in accordance with waste legislation and site guidelines.
Monitoring requirements	Where monitoring is currently undertaken for compliance the relevant parameters will be discussed in relation to the decommissioning procedure with the relevant authority prior to decommissioning.
Emergency preparedness	Appropriate emergency response equipment and preventative practices will be in place such as fire-fighting equipment and spill kits/response material. Detailed plans and procedures will be developed in conjunction with contractors.
<p>Site contamination investigation:</p> <p>Areas to be noted for sampling to include:</p> <ul style="list-style-type: none"> • <i>Vicinity of hazardous material storage and/or plant areas</i> • <i>Areas of contamination identified in the IPPC Application</i> <p>Materials to be noted for sampling to include:</p> <ul style="list-style-type: none"> • <i>Man made soils (made ground or fill)</i> • <i>Underlying groundwater</i> 	<p>The extent/requirement for site contamination investigation and any decontamination works will be derived from the findings of the initial site report and knowledge and records of processes and any incidents of the operation of the installation throughout the lifetime of the Permit.</p>
Cleaning of materials storage areas	Prior to final demolition or dismantling all storage areas should be thoroughly cleaned in accordance with the nature of its former contents. If equipment is dismantled before decontamination, a suitable place must be defined where complete cleaning can be performed in an environmentally sound manner.
Cleaning of plant production facilities	All equipment is to be cleaned in accordance with the nature of its former contents. If equipment is dismantled before decontamination, a suitable place must be defined where complete cleaning can be performed in an environmentally sound manner.
Removal and/or sealing of building fabric	Removal of contamination from building fabric must take place in a manner to prevent releases to the environment or sealing of the building fabric, where appropriate, to prevent the future release of contaminants.
Removal and flushing out of pipelines	All pipelines (both under and above ground) must be, as a minimum, flushed through. An assessment for removal will then be made.
Removal or flushing out of vessels including storage facilities	All vessels (both under and above ground) must be, as a minimum, flushed through. An assessment for removal will then be made.
Cleaning of abatement plants	Careful cleaning of abatement equipment in accordance with the nature of its former contents must take place. If equipment is dismantled before decontamination, a suitable place must be defined where complete cleaning can be performed in an environmentally sound manner.
Areas of residual contamination	It may be necessary for some areas to undergo demolition prior to nearby areas undergoing the required decontamination process. In such instances

	consideration must be given to the containment of residual contamination to prevent its mobilisation and release into the environment.
Records maintenance	Ensure the Health & Safety File is available and up-to-date as a source of information and any records of incidences are recorded through Safety Online.

Table 1- Elements for consideration during the preparation of a Site Closure Plan and the completion of an environmental risk assessment.

Reference: Remedial Treatment for Contaminated Land Volume II: Decommissioning, Decontamination and Demolition. CIRIA, 1995.

7. DOCUMENT HISTORY

Version	Details of change(s)	Performed by	Date
1	New document information from OC 12.1 and 12.2 combined and rationalised	L. Smith	01/12/2014
2	Admin logo update	J Bowman	04/08/2015
3	Addition of Sapphire Shredding Facility	H. Witchalls	08/01/2019