

I'Anson Bros Ltd

Dalton Mill

SITE CLOSURE PLAN

February 2022

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1. INTRODUCTION

Under Condition 1.4.1 Reference 3 of the PPC Permit and in accordance with Section 2.11: Closure, of the Food and Drink Sector Guidance Note (IPPC S6.10, August 2003), l'Anson Bros Ltd is required to develop and maintain a Site Closure Plan "to demonstrate that, in its current state, the installation can be decommissioned to avoid any pollution risk and return the site of operation to a satisfactory state".

The purpose of the Site Closure Plan is to address environmental pollution risks that may occur during decommissioning of the site, and outline techniques to plan for and minimise the effects of these potential risks.

The SITE CLOSURE PLAN draws on and references available information, including:

- Information and site plans included with the PPC application submitted in 2023;
- The Application Site report (ASR) submitted with the PPC application;
- The site asbestos register; (The Dalton site was a new build in 2022-24 so no asbestos is present).
- The register of hazardous materials held on site;
- Pollution, inspection and audit records; and

The SITE CLOSURE PLAN is designed to complement the Application Site Report (ASR) and is designed to facilitate the Surrender Site report that is required to be submitted in the event of site decommissioning or closure.

2. SITE ACTIVITIES

2.1. Installation Summary

The l'Anson Bros Ltd Dalton Mill site installation, operated by l'Anson Bros Ltd, manufactures animal feed.

The installation activity is listed in Schedule 1 of the PPC Regulations namely Section 6.8 A (1)(d)(i):

"Treating and processing of vegetable raw materials intended for the production of food products with a finished product production capacity of more than 300 tonnes per day".

There is one main production activity undertaken at the installation within the main production building.

The site is located in North Yorkshire in the Dalton district just off Cod Beck Lane.

The site is centred on grid reference ; 441810 476290.

The area of the installation covers about 4.14 Hectares.

The site comprises an administration building mill buildings, and associated storage tanks.

Production volume is around 400,000 tonnes.

The installation operates on a 24-hour basis, usually for 5½- 6 days per week and for 52 weeks per year.

2.2 Main Findings of the ASR

An Application Site Report (ASR) was submitted in support of the PPC Application. Whilst focusing on land and water quality at the site, the ASR is one of the key references for the purposes of producing this Site Closure Plan.

The main findings of the ASR are as follows:

- Activities to be operated on the site relate to the treating and processing of grain, additives and other materials to produce animal feed and associated activities;
- **Topography:** The Vale of York is an area of flat land. The vale is a major agricultural area and serves as the main north–south transport corridor for Northern England;
- **Geology:** Beneath the drift deposits of the Vale of York lie Triassic sandstone and mudstone, and lower Jurassic mudstone but these are completely masked by the surface deposits. These deposits include glacial till, sand and gravel and both terminal and recessional moraines left by receding ice sheets at the end of the last ice age;
- **Hydrology:** The Vale of York provides a large amount of water for local communities and for those as far away as Sheffield, both from underground aquifers and from abstraction from the rivers running through the NCA, (National character Area);
- **Surface Waters:** Cod Beck is the nearest water course to the site and the water course into which storm water from the site drains. Cod Beck itself drains into the River Swale. Flood data shows that in the event of an extreme flooding event there is a risk of river flooding to the Northeast corner of the site from Cod Beck. However, the ground which could be affected is confined to the landscape strip, which is at least 5m lower than the oversite of the mill buildings;
- The site has been purpose built for the treatment and processing of raw materials for animal feed products between 2022 -2024. Any contaminants that may have been released by other historical industrial or agricultural activities may already be present on site, however research carried out during the planning process suggests this is most unlikely;
- Activities identified with a reasonable possibility of future pollution occurring include delivery of liquid raw materials by road tanker;
- The site is monitored as part of the Site Protection & Monitoring Programme.

2.3 Potential Pollution Risks

Table 1 summarises the main potential risks relating to sources of pollution on site, pollution pathways and possible environmental impacts that may occur during decommissioning.

Table 1 - Main Potential Pollution Sources, Pathways and Impacts

Source	Location	Identified Pollutant	Identified Receptors	Potential Pathway to Receptor (during decommissioning)	Potential Impact
Raw Materials, Packaging, Products and Wastes.					
Drummed & IBC liquid raw materials	Internal – stored in dedicated drums in a designated area within the mill & workshop on drip trays or sump pallets	Good grade liquid raw materials	Local ground and groundwater.	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface water • Direct contact 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Effect on surface water • Potential effect on human health
Bagged raw materials (e.g. vitamins and supplements and IBCs (tote bins))	Designated areas within the main process building and warehouses	Good grade solid raw materials			

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Drummed liquid auxiliary materials (e.g. oils and detergents)	Internal – stored in warehouse building and point of use	Including hydrocarbons, surfactants and biocides			
Product	Designated areas within the main process building and warehouses	Food grade solid raw materials	Local ground and groundwater. Surface waters	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface waters 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Effect on surface waters
Waste oil drums and waste digest	Internal – stored in dedicated drums on drip trays within a designated waste storage area	Contaminated waste hydrocarbons, food grade liquid waste raw materials	Local ground and groundwater.	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface waters • Direct contact (including dermal/ingestion/inhalation of vapours) 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Potential effect on human health
Plant Infrastructure					
Silos	Internal – inside main production Area and externally	Food grade solid raw materials (e.g. cereals)	Local populace. Local ground and groundwater	<ul style="list-style-type: none"> • Dispersion in air • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface waters • Direct contact (including dermal/ingestion/inhalation of dusts) 	<ul style="list-style-type: none"> • Particulates in air • Soil contamination • Pollution of groundwater • Potential impact on human health

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Tanks	Internal – within dedicated bunded area	Food grade liquid raw materials (e.g. molasses, & vegetable oils)	Local populace. Local ground and groundwater	<ul style="list-style-type: none"> • Dispersion in air • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network • Direct contact (including dermal/ingestion/inhalation of dusts) 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Potential effect on human health
AdBlue,	Vehicle Wash hut on bunded pallet	Combustion additive	Local populace. Local ground and groundwater	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface waters • Direct contact (including dermal/ingestion/inhalation of vapours) 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Potential effect on human health
Foul and effluent drains	Throughout site	Including domestic waste, hydrocarbons and surfactants	Local populace. Local ground and groundwater	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Direct contact (including dermal/ingestion/inhalation of vapours) 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Potential effect on human health
Transformer oils	Transformers	Transformer oils	Local populace, Groundwater, soils	<ul style="list-style-type: none"> • Infiltration into surface soils • Migration to and movement within groundwater • Direct contact (including ingestion/vapour inhalation) 	<ul style="list-style-type: none"> • Soil contamination • Pollution of groundwater • Potential effect on human health

Demolition					
Dust during demolition	Site wide	Particulates	Local populace. Local ground and groundwater	<ul style="list-style-type: none"> • Dispersion in air • Infiltration into surface soils • Migration to and movement within groundwater • Migration through drainage network to surface waters • Direct contact (including dermal/ingestion/inhalation of dusts) 	<ul style="list-style-type: none"> • Nuisance to local populace • Contamination of soils • Pollution of groundwater • Deposition on soils
Noise and vibration nuisance during demolition	Site wide	Noise and vibration	Local populace	<ul style="list-style-type: none"> • Dispersed in Air 	<ul style="list-style-type: none"> • Nuisance to local populace
Odour during demolition	Site wide	Various odours	Local populace	<ul style="list-style-type: none"> • Dispersed in Air 	<ul style="list-style-type: none"> • Nuisance to local populace

3. CLOSURE PROCEDURES

The closure and vacation of the l'Anson Bros Ltd Dalton installation may pose potential impacts on the environment, summarised in Chapter 2 of this report. Under the conditions of the permit, it is necessary to adopt controls and practices to minimise any environmental impacts whilst the site is operational. The following general principles will also be followed during decommissioning.

3.1 Review of Accidents, Incidents and Near Misses

l'Anson Bros Ltd will conduct a comprehensive review of past accidents, incidents and near misses by consulting incident logs and registers maintained within the Environmental Management System.

3.2 Review of Potential Pollution Sources

The general principles will be applied for each of the potential pollution sources listed below.

- Bulk storage bins
- Bulk storage tanks
- Bunds
- Unused materials
- Engineering materials
- Finished products
- Wastes
- Transformers
- Drainage system

The following figures are included within this document to present:

Figure 1 - Site layout plan showing PPC installation boundary and key activities, as presented in the original PPC application.

Figure 2 - Site drainage plan

3.2.1 Bulk Storage Silos

Raw materials are stored in bulk bins and silos located internally within the installation:

These bins and silos contain materials of vegetable origins, e.g. wheat and soya and minerals e.g. limestone

All storage bins and silos would be emptied by incorporation into finished product and where this is not possible the materials would be transferred to another mill to minimise waste generation.

All bagged and IBC ingredients would also be transferred to the nearest compatible Feed mill for incorporation into product.

3.2.2 Bulk Storage Tanks

Fat, Vegetable Oil and Molasses are used as ingredients in the animal feed. Approaching the point of closure consumption of these materials would be carefully managed to ensure that all liquid tanks were emptied and the materials used to make feed this will minimise wastage and energy usage involved in transferring materials elsewhere. It also minimises the potential for spillages. The empty tanks would be cleaned by approved specialists and any residues would be disposed of by approved waste disposal contractor. The tanks would be of value to another producer and would most likely be relocated to another feed mill. The bunds would be cleaned and associated steel, brick and concrete works would be recycled.

Adblue; Adblue is used for the HGV operation and is stored in a self-bunded tank. The Adblue is dispensed to the vehicles via a key controlled pump located adjacent to the tank. In the event of closure stocks would be managed to ensure a nil stock on completion. Any residue remaining in the tank would be transferred to another mill.

The tank and pump would be transferred to another site or sold at auction.

The bunding would be cleaned and recycled.

Bunds

Decommissioning of bunds will, only occur after the decommissioning of the relevant vessels they contain.

Bund water will be disposed in accordance with any potential pollutants, either to foul sewer or as hazardous waste.

3.2.4 Unused Materials

Both raw materials and packaging materials which are suitable for their intended purpose will be transferred to other sites. Materials which are unsuitable for use will be appropriately disposed as waste.

Recycling or recovery opportunities will be maximised to avoid disposal to landfill.

Special arrangements will be made for any hazardous wastes

3.2.5 Engineering Materials

Workshop chemicals such as oils, greases, paints, aerosols, boiler chemicals etc. would be transferred in their original packaging to other company sites as appropriate.

Any waste oils and solvents (including oily rags and other cleaning materials) would be disposed of hazardous waste via a registered specialist contractor.

3.2.6 Finished Products

Finished product will be sold. Any finished product that cannot be sold will be disposed of appropriately depending upon the nature of material and level of any contamination.

3.2.7 Wastes

All waste generated during the closure process will be segregated into streams appropriate for recycling e.g. paper, cardboard, plastic, metals, oil etc. These waste streams will be handled by registered contractors and all waste transfer documentation will be maintained on file.

3.2.8 Transformer Station

The oil within the transformer and switch gear on the l'Anson Bros Ltd Dalton site was new when the site was built therefore it is free of PCB contamination.

3.2.9 Asbestos

No asbestos is present at the site as this material became a banned substance prior to construction.

3.2.10 Drainage System

The interceptor will be gulped by a specialist contractor. All wastes collected will be appropriately disposed of by a registered contractor. Duty of care documentation and consignment notes will be held centrally by l'Anson Bros Ltd for two years, or a minimum of five years for special waste.

The drainage system will be purged with water to clean the system, after all demolition work is complete.

3.3 Decommissioning

3.3.1 Noise; the mill is surrounded by a several residential dwellings. All works would be carried out to minimise disruption to the neighbours. The neighbours would also be forewarned of any planned works.

Monitoring will be considered and undertaken as necessary to ensure the efficiency of mitigation measures adopted.

3.3.2 Demolition of Buildings and Above Ground Infrastructure; if the mill buildings were to be demolished then all of the preceding issues would need to be resolved first i.e. the feed materials, liquids, fuels etc.

The plant would be made safe by isolating electrical, hydraulic and air supplies. The production plant would be removed and sold/transferred to other sites.

The demolition engineers would be provided with copies of the drainage plans and instructions not to put any materials into the surface water drains.

Air conditioning units would have their refrigerant recovered by a specialist contractor prior to any dismantling work taking place.

The site would be handed over to a specialist demolition contractor once all equipment had been removed and the site made safe and secure. This operation would be controlled by CDM regulations and the planning would cover all environmental controls required which would be recorded in the CDM file. The CDM file will include a copy of the Emergency Plan.

4. MANAGING THE CLOSURE PROCESS

4.1 Responsibilities; The Operations Manager would have overall responsibility for the site closure programme.

The Operations Manager would have day to day responsibility for implementation. Guidance and support would be provided from the other members of the l'Anson Bros Ltd management team and specialists as required.

The workshop facility would be maintained as long as the site was manned in order to facilitate a controlled closure of the site. The engineering team would be retained throughout the closure process as they have the necessary skills to ensure safe and controlled shutdown of the operation.

The workshop is also the centre for specialist control measures such as emergency spill kits.

4.2 Planning; if the site was to be closed a senior management team would oversee the planning of the process.

Any decision to close the site would take into account the environmental impact of the closure and any associated demolition etc. that might be required. Technical expertise would be provided by the l'Anson Bros Ltd management team. EA, Local Authority, Parish Council (including neighbours) and Workforce would be consulted on closure plans at the appropriate stage.

4.3 Review; the Operations Manager will review the Site Closure Plan every 2 years to ensure that the plan is up to date and additionally if there are related changes to the operation.

Figure 1 PPC boundary, releases to atmosphere and key activities

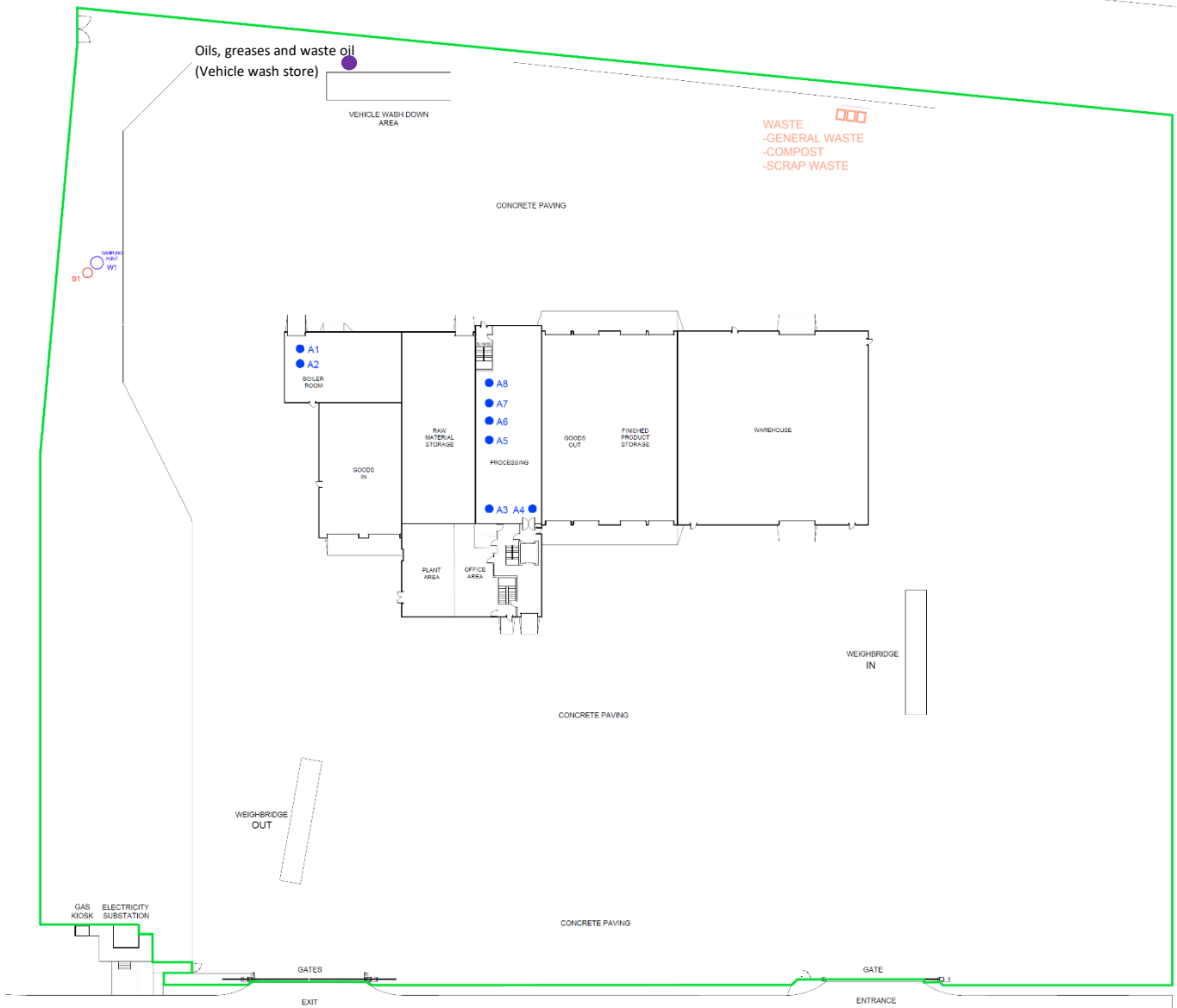


Figure 2 Drainage plan

