

Essity UK Ltd - Oakenholt Mill.

Oakenholt Site Closure Plan - August 2018

(Assuming total plant closure)

1. Planning for Site Closure

- Ensure the site closure is planned & executed in line with the latest guidance and relevant legislation from Natural Resources Wales.
- Ensure the site closure (& demolition if applicable) is planned & executed in line with the latest Environmental & H&S guidelines.
- Undertake an Environmental Impact Assessment for the project in the early planning stage.
- Removal and disposal of Radioactive material will be carried out following guidance from our Radiological Protection Advisor (R.P.A), Public Health England (PHE) and in accordance with all current legislation at that time.

2. Removal of all production raw & intermediate materials from site

- Ensure all surface water drains are protected from any pollution entering them.
- Run out raw & intermediate materials, either by use in the process or removal from site, by return to manufacturer, recycle, or correct disposal route in line with Duty of Care Guidance for waste disposal.
- Flush through all stock systems with water. Drain all stock & water chests & power-wash the inside of the vessels. Clean out all chemical systems using an approved method, collect all residuals for controlled disposal. Check that all process lines are self-draining, if not add to risk analysis that residual liquid could be present when removing the line.
- Clear up all residual paper dust & dispose of in line with Duty of Care guidance for waste disposal prior to removing any equipment.
- Flush out all floor U-drains to effluent sump & empty sump prior to equipment removal.

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3. Removal of all equipment from site

- The Health and Safety file will contain a plan for the order and method equipment will be removed.
- All materials (e.g. fuels) required for demolition & equipment removal will be correctly stored away from sensitive receptors (e.g. watercourses) and with secondary containment in the event of a spill.
- All equipment to be cleared from the site will be checked, flushed out if necessary, with lubricants being drained, prior to removal from building. This minimises the risk of materials leaking out & contaminating the ground during the removal process.
- Gas and water supplies will also have a risk assessment carried out and plans made to move or protect them.
- All power cables to pumps, agitators, trace heating and motors etc. will be isolated and the cables pulled back to their distribution boards. Fuses will be removed, and the panel labelled to say what state it is in. Distribution boards will then be isolated, and their power cables pulled back until power has been removed back to the incoming substation.
- All stock & chemical systems (tanks, pipes, equipment etc) will be removed first, whilst maintaining the water system to allow water if required, and the air system to allow air for air tools & the steam system for heating.
- All redundant steam and condensate pipes will be isolated as near to the boiler house as practical. The pipes will be removed, and the header capped with a blank flange or a spade.
- Remove all equipment from machine floor that can be removed by machine hall crane.
- Remove all equipment from basement & mezzanine area, parent roll storage warehouses and from the roof.
- Air conditioning units and any refrigeration equipment will be de-gassed and disposed in line with latest legislative requirements and Government guidance.
- Remove air, water, steam and fire protection systems.

4. Demolition of buildings & structures

- The demolition site will be segregated with fencing and only authorised persons will be able to enter site. Visitors will have to sign in and be accompanied at all times.
- All underground services will be marked out prior to demolition.
- The area for refuelling of plant equipment will be clearly designated.
- The Health and Safety file will detail the order and method of demolition and the plan for waste disposal.
- A system that records the amount and type of waste that is disposed of & its final location will be in place.
- Wherever practicable demolition materials will be recycled.
- Demolish all building structures in prescribed order as defined in the Health and Safety file.

5. Checking & making good the site

- Review records maintained in relation to permitted site activities that have a potential to cause a deterioration in site condition and assess the presence or otherwise of ground contamination using a 'lines of evidence' approach.
- Where there is evidence of changes in site condition that can be attributed to permitted activities, an intrusive investigation will be carried out to establish the nature and extent of this contamination. If necessary, measures will be taken to restore the initial ETP installation to the condition established by the site report submitted at the time of its ETP permit application.

