

Attachment K

Remediation, Decommissioning, Restoration and Aftercare

Attachments in this Section include:

K.1 Facility Closure Plan

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Attachment K.1 Facility Closure Plan

While there are no short or medium term plans to cease operations or close the facility, it is considered that there would be sufficient cash flow and funds from the sale of materials, plant and equipment to offset the costs of any known liabilities. A financial bond may be put in place with the Environmental Protection Agency, or other financial security as required by conditions of the waste Licence. This finance will be used to underwrite liabilities in the event that O'Toole Composting Limited is not in a financial position to fully fund the clean closure of the facility.

The following elements would be necessary in the event of closure of the facility:

- Transfer of waste materials offsite
- Recyclable materials to be sold to suitable waste contractor or broker,
- Unprocessed mixed recyclable materials to be transferred/sold to a suitable MRF for processing,
- Any residues, contaminated, non-recyclable or quarantined wastes to be consigned to landfill for disposal,
- Any wastes containing any hazardous properties or quarantined waste to be collected by a permitted waste collector and transferred to an appropriately licensed hazardous waste facility.
- Written records of all wastes transferred from the facility will be maintained in accordance to Conditions of the Licence.

Decontamination of plant and machinery

- All plant and machinery to be drained of any fuels or oils.
- All plant and machinery to be powerhosed to remove any physical contamination. Powerwashing will take place in an area suitable for vehicle washing.
- *Scenario 1:* Facility to be sold as a going concern with all decontaminated machinery and equipment included as part of the sale.
- *Scenario 2:* Plant and machinery to be sold. Other waste processors (or other similar industry) may require such plant or machinery. Alternatively plant or machinery could be dismantled into parts and recycled where reuse is not feasible. The revenue from sales would offset the costs of decontamination calculated below.

Decontamination of Waste Processing Buildings and Storage Bays

- If the processing plant has been removed from the waste processing buildings the storage bays can be knocked. The area will be cleared of all wastes and swept using a mechanical road sweeper. Corner areas and wall floor junctions

will be swept using a manual brush as these areas may not be accessible fully by the road sweeper.

- When the area is clean of all waste and has been swept the floors and walls will be power washed to ensure that any contaminants are removed and that the building is left suitable for use for the next tenant.
- All waste water runoff from the power washing within the building will be retained within the tank. This will be pumped out and sent for offsite disposal.

Decontamination of Outdoor Site Area

- The site is partially concreted and maintained in good condition during operational activities. The yard area of the site will be swept by a mechanical road sweeper vehicle to remove any dust or litter caused from the closure of the facility.

Weighbridge to be Dismantled

- *Scenario 1:* Facility to be sold as a going concern with the weighbridge included as part of the sale.
- *Scenario 2:* As the weighbridge is a surface mounted weighbridge it can be readily dismantled. The weighbridge can be sold possible to the original supplier or to an alternative waste quarry or other facility. The concrete hardstand under the weighbridge will be cleaned as part of the hardstand decontamination.

Emptying of Leachate Tank

- A permitted contractor will be employed to carry out this activity. The leachate tank will be emptied using a tanker and will be cleaned with all waste water removed offsite to a WWTP. This works will be carried out as one of the final task.
- Deconstruction of waste processing building and offices will not be considered necessary as part of this closure plan. The buildings and offices, once emptied and decontaminated can remain vacant and be suitable for any other commercial purpose in the future.

Validation of Clean Closure & Environmental Monitoring

On completion of all works associated with the closure of the facility the permit holder in conjunction with the Agency will carry out a site audit to verify that all activities have been carried out that render the facility can be closed as there are no remaining environmental liabilities. All environmental monitoring will be carried out by O'Toole Composting Limited as requested by conditions of the licence until the

closure of the facility has been verified by EPA. Any additional environmental monitoring required by EPA will be conducted by the permit holder. Only after validation from EPA will the licence holder consider the closure of the facility to be completed.

Successful clean closure will be expected to be achieved when it can be demonstrated that there are no remaining environmental liabilities at the site. In practice this will require demonstration that the following criteria have been met:

- All plant is safely decommissioned using standard procedures and/or authorised contractors.
- All wastes handled, packaged, temporarily stored and disposed or recovered in a manner which complies with regulatory requirements.
- All relevant records relating to waste and materials movement and transfer or disposal were managed and retained throughout the closure process.
- There was no soil or groundwater contamination at the site.
- The Environmental Management System (EMS) remained in place and was actively implemented during this process.

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