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Wolfmet Environmental Permit (EPR/BP3930JC) – Site Closure Plan, Decommissioning Arrangements Covering Removal of Pollution Risk

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1 Introduction

Following the decision of M&I Materials Limited, to relocate the Wolfmet manufacturing plant from Hibernia Way, Trafford Park, Manchester M32 0ZD, the operator has continued to undertake all related activities in open dialogue with its key stakeholders including the Environment Agency in line with the notification requirement of its permit (EPR/BP3930JC).

The following decommissioning plan describes only the decommissioning of the permitted Wolfmet process. The relocation of the Wolfmet Plant will have no impact on the other permitted and non-permitted production processes undertaken at the now Shell Midel owned site. Nor will the relocation of the Wolfmet Plant have any impact on the functionality of the critical environmental protection infrastructure, such as drainage, combustion plants or pollution containment, that will remain in place to serve the other non-affected production processes.

This report presents how the identification of the pollution risks associated with the decommissioning and relocation of the Wolfmet Plant is to be managed through decommissioning and permit surrender. The plan is available for consideration by the local inspector on request. The plan covers the preliminary actions undertaken to facilitate a phased shut down, removal of processing equipment and control philosophy for managing pollution risk which are consistent with measures being considered for the final decommissioning works ahead of the permit surrender.

The main actions and hazards constituting decommissioning are associated with the removal of all materials (raw materials, ancillary chemicals, or waste) that could potentially present a pollution risk, the cleaning of all associated infrastructure, plus, the selective removal from site of items for relocation or scrapping.

Through the application of this Site Closure Plan, the Operator has committed to the premise that site decommissioning activities for the installation would be planned and implemented to minimise the potential for environmental impact. This is through control of potential pollution, including from raw materials, surface water, dust, odour, noise, and vibration.

In line with the commitment made by the operator at permit application, upon definitive cessation of this permitted activity, this Site Closure Plan will be implemented, with appropriate measures to avoid any pollution risk and return the site to a satisfactory state in accordance with the findings of the Site Condition Report (Appendix 1).

2 Decommissioning Environmental Control Philosophy

The programme and pollution risk control philosophy associated with decommissioning has been identified. The actions that constitute decommissioning are the removal of all materials (raw materials, product, or waste) that presented a potential pollution risk, and cleaning of all associated infrastructure. The majority of the equipment that is used for the manufacturing process of Wolfmet will be relocated for re-use at M&I's new site. Sale of items is not anticipated.

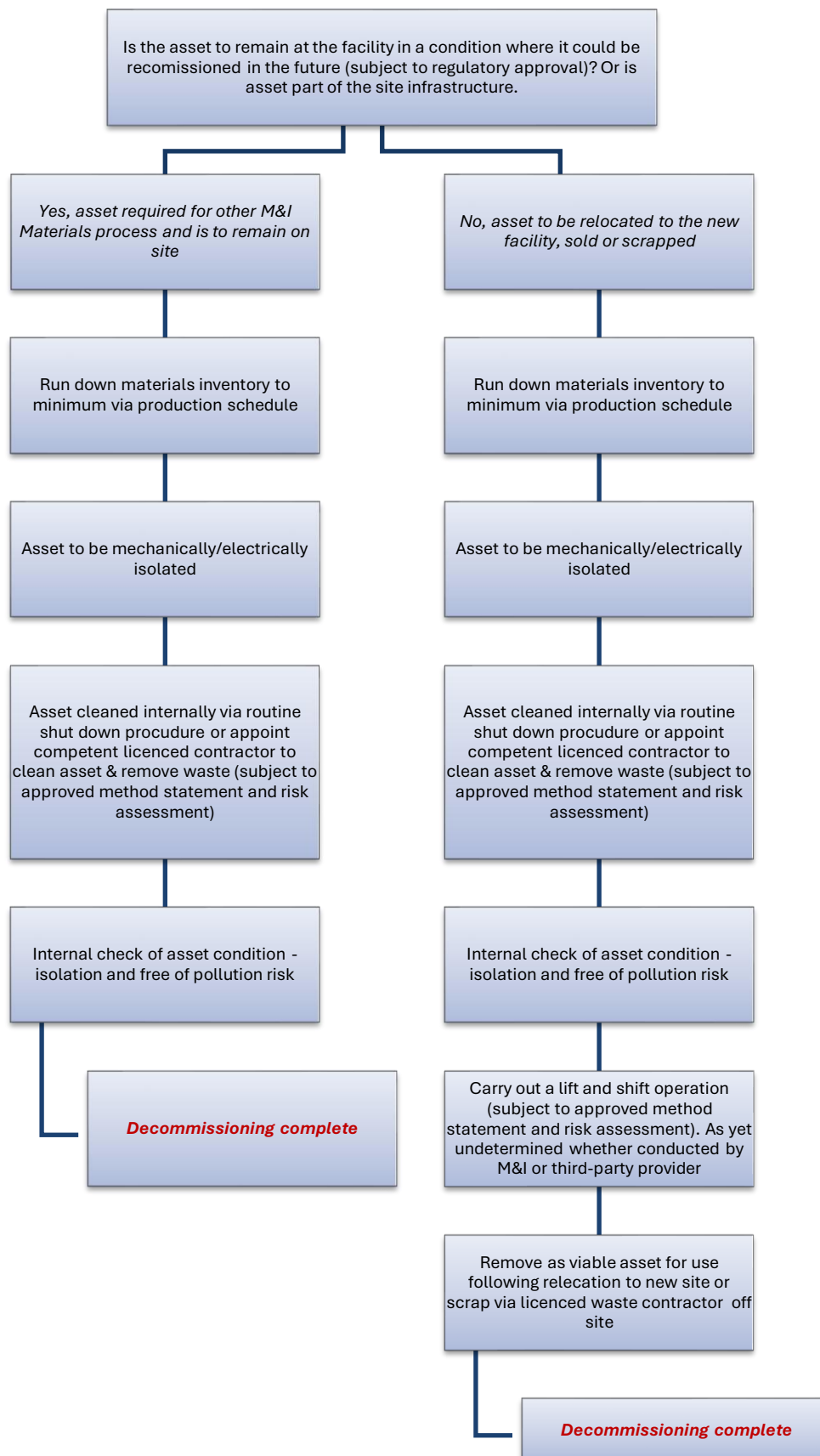
The cleaning and decontamination of all assets to be decommissioned will be verified by visual inspection of the assets by the Operator to confirm that they are sufficiently free of polluting substances, electrically isolated and made safe to allow for disposal or the lift and shift operation.

Where relevant, contractors will provide formal documentation to show that all equipment was washed and certified as clean before removal from the site. Full duty of care documentation will be maintained for all materials removed from the site as waste. All disposals will be undertaken in an environmentally responsible manner.

The senior managers will be responsible for discharging decommissioning by verifying that all steps in the programme are completed and that no contamination occurred in both the operational phase of the permit leading up to and through to the end of decommissioning. Further reviews of this 'Operational' Site Closure Plan are not envisaged within the decommissioning timescale. However, should there be any major changes a review will be undertaken.

This approach is summarised overleaf in the Generalised Asset Decommissioning Process Flow diagram.

2.1 Generalised Asset Decommissioning Process Flow



3 Environmental Considerations During Facility Operation

In order to achieve efficient maintenance of the process equipment, each item of major plant is serviceable. To ensure proper operation and maintenance of the process equipment, M&I have utilised established maintenance practices, third-party advice and internal procedural knowledge of plant function held for the unique and bespoke nature of the Wolfmet process.

The specific environmental implications of the site's previous activities have been determined from the site condition report conducted in 2017 that was supplied the environment agency during the Wolfmet permit application in 2018, see Appendix 1.

As part of the operation of the site, a formal management system was put in place with additional measures to control significant environmental aspects, which could lead to pollution incidents from the permitted activities. Measures used to protect land are detailed within the site's Environmental Management System (EMS). The operation of the EMS is certified to the ISO 14001:2015 standard and lead to the implementation of certain internal control measures to protect the land and have been used in the production of this plan. The key issues of relevance to the permit and installation are summarised as:

- Chemical storage and handling activities only take place in internal areas that have an impervious concrete floor and are not in proximity to any drainage.
- Manufacturing equipment, damage to plant, and corrosion to steelwork are inspected to a schedule held on the company's maintenance system.
- Other containment items such as tanks, pipework, and hardstanding have also been inspected and maintained at regular intervals according to schedules held on the company's maintenance system.

3.1 Formal Management Systems

Throughout the period of operations under the permit the site has operated formal environmental and asset protection management systems to ensure ongoing management, maintenance, and improvement of environmental controls. The Operator will continue to maintain and review the formal management system working to the requirements of the pollution control measures for Wolfmet throughout the period of decommissioning of the Wolfmet Plant and until permit surrender.

The company operates incident reporting tools to encourage all staff to report any potential environmental risks around the site through the non-conformance/incident reporting forms, resulting in corrective and preventative actions. The purpose of these procedures is to ensure that identified hazards relating to health, safety and environmental concerns are reported, recorded, and investigated in a consistent, systematic manner in compliance with the health, safety and environmental requirements. The procedures identify any potential non-conformances and detail such preventive actions as are necessary to mitigate any consequences arising from such observations and will be used during the decommissioning period.

3.2 Materials Handling and Bulk Storage Infrastructure

Regarding Wolfmet production, all deliveries are supervised by trained staff in accordance with the relevant Standard Operating Procedures. All pipework, storage tanks and pumps used to transport and store raw materials are located within the processing building, are above ground and are regularly inspected.

3.3 Planned, Preventative Maintenance Programme

During the lifetime of the permit, the Operator operated a formal planned, preventative maintenance program. Associated inspections looked for issues such as general damage to equipment, leaks, loose

fittings or connections, excessive heat, or noise emissions. Furthermore, in-depth periodic checks of this plant and equipment were also carried out. As a result of these inspections, any maintenance or improvements were then carried out by an in-house maintenance team and supported by external contractors as required.

Due to the closed loop nature of the Wolfmet process and its full operation occurring internally, there have been no recorded incidents of released polluting materials being lost to ground, groundwater, or drainage leading to controlled waters or water treatment facilities.

4 The Site Closure Plan

The Operator propose that site decommissioning activities for the whole Installation shall be planned and implemented in order to minimise the potential for environmental impact through control of potential pollution, including from raw materials, surface water, dust, odour, noise, heat and vibration.

The following table summarises the proposed elements of the Installation Site Closure Plan that will be implemented in line with the relocation of the Wolfmet Plant and surrender of EPR/BP3930JC:

4.1 Overall Closure Stages:

The approach taken can be summarised through the following stages:

Stage	Activities
1. Data gathering	Collation of baseline data including the 2017 Site Condition Report, operational records, site plans, incident reports, asset condition assessment and the facility's raw materials inventory.
2. Planning	Preparation of a decommissioning programme to identify the process equipment and raw materials to be relocated. The programme aims to maximise reuse of suitable existing assets and minimise the scrappage through recycling and disposal.
3. Hazard assessments	Using data from stages 1 and 2, the operator will undertake an assessment of the potential environmental hazards associated with the decommissioning process following the decommissioning considerations outlined.
4. Hazard Control	Prior to commencing the decommissioning process, the operator will prepare method statements and risk assessments in accordance with the requirements of the Construction (Design & Management) Regulations to control all decommissioning works. This stage will also include the preparation of pollution prevention measures/environmental management procedures to ensure the decommissioning works has a minimal impact on the environment including (but not limited to): emergency response procedures, provision of environmental protection products and avoidance of surface water contamination, the removal or flushing out of pipelines and vessels etc.
5. Decommissioning	Mobilisation of suitably qualified personnel and contractors to undertake the decommissioning work working to detailed method statements prepared either by The Operator (or its appointed competent body) as Principal Contractor or appointed sub-contractors to comply with stage 4 and the protection of surface and groundwater across the site.
6. Permit Surrender	Surrender the Permit on completion of decommissioning activities and decision to apply to surrender.

5 Site Closure Environmental Considerations

While a site closure is not going to be undertaken for the Wolfmet relocation and permit surrender, proposals for ensuring that satisfactory closure arrangements upon cessation of this permitted activity have been considered. These are given below:

- Decommissioning

- Decontamination

These considerations are consistent with the Health & Safety Plan for the facility however they should be read in conjunction with this report. Aspects of site closure decommissioning and decontamination that relate to the Wolfmet plant are described below.

5.1 Decommissioning at Site Closure

Decommissioning will involve all major assets including furnaces and associated infrastructure at the installation. This will include safe disconnection of services and isolation of the production area from the associated plant/equipment, waste and product storage areas. The decommissioning will involve the active management of general housekeeping measures and securing the site from unauthorised access. Factors that will be considered, and the general approaches to be adopted are shown in the Table in section 5.3.

5.2 Decontamination at Site Closure

Decontamination will involve the treatment and cleaning of structures or equipment contaminated during the operation of the plant, or where hazardous substances are part of the plant or associated infrastructure. Factors that will be considered, and the general approaches to be adopted are shown in the Table in section 5.4.

5.3 Decommissioning Considerations

Factors considered	Approach
Structure and Responsibility	Identification of a designated Management Representative to co-ordinate all decommissioning activities; responsibilities defined for all key internal personnel; authorisation established for all decommissioning activities; and sufficient resources including human resources, skills resources, technological resources and financial resources sufficient to discharge all elements of the closure plan. An assessment of the competency of all internal personnel undertaking works in connection with the discharge of the closure plan will be made where actions are required to manage, assess, and verify through inspection or analytical measures critical steps. Records of those personnel involved with the closure plan will be kept and line management sign off sought where required.
Contractor Selection and Management.	Contractor evaluation to require demonstration and verification by interview, documentation, and site review of competency through obtaining copies of Health and Safety Policy, Environmental Policy, Training Records, Accident Records, Liability Insurance, Risk Assessments, Method Statements, Waste Carriers Licence/Environmental Permits. Work covered under CDM regulations subject to further controls and pre-competency checks by The Operator in conjunction with the CDM Co-ordinator.
Awareness of all contractors of site rules for environmental protection.	Specific site rules included within contracts and on-site induction for environmental protection given to all contractors prior to start of work.
Protection against vandalism.	Access to the establishment and equipment subject to decommissioning will be restricted to authorised internal and external persons only.
Access & loading/unloading areas.	Continually assessed in conjunction with contractors for specific tasks. Access to the establishment and dismantled equipment will be restricted to authorised persons only.
Cleaning of raw materials storage areas.	As many of the residual chemicals as possible are to be removed from the site by relocation or disposal, special attention will be given during the loading process to the material, hazard characteristics and its classification with regard to disposal. Buildings and equipment will be cleaned in such a manner as to allow safe dismantling where necessary. All disposals will be undertaken in an environmentally responsible manner favouring in reuse, and recycling over disposal.

Cleaning of tanks	Removal and disposal of all materials will be carried out in compliance with environmental legislation and with due regard, where applicable, to the waste hierarchy.
Cleaning & dismantling of abatement plants.	Careful dismantling of plant and cleaning of the dismantled elements of the plant and associated piping. Prior cleaning by flushing through of ductwork will be undertaken if required.
Cleaning of supply lines	Raw material supply and product lines will be cleaned to an appropriate standard with any associated waste materials removed from site through the normal disposal routes. Once cleaned the lines will be disconnected from the bulk facilities to ensure permanent physical isolation.
Safe disconnection of services.	All electrical services will be locked off and disconnected and cut from the distribution switch room. All compressed air lines will be disconnected, ensuring no residual pressure is left within the lines. Oil lines will be drained.
Waste disposal of solids.	All wastes including scrap will be clearly identified, appropriately packaged and correctly disposed of in accordance with the relevant legislation (Controlled and/or Hazardous waste). All waste documentation will be retained and verified.
Waste disposal of liquids.	The Wolfmet process does not involve use of liquids directly in the process. Small amounts of liquids arising from engineering and cleaning work may be generated, this will be sent off site for treatment via recovery or disposal. A complete log of contractors and records of movements of materials will be retained by the operator. All waste removal will be completed under supervision and in accordance with legislation (Controlled and/or Hazardous Waste). All waste documentation will be retained and verified.
Location plans for all infrastructure/pipework.	Will be determined as part of the pre closure investigation, with modification of site plans as appropriate.
Verification procedure, sign off and record Keeping	All steps in the decommissioning process will be verified by a competent company representative, responsible for the discharge of the closure programme. All records confirming actions to be identified in advance of the programme being implemented. A records file will be available and up-to-date as a source of information.
Emergency preparedness.	Spill kits/response materials will be present on site. Existing plans and procedures are considered appropriate and will be shared with contractors for their aspects of the decommissioning process.

5.4 Decontamination Considerations

Factors considered	Approach
Protection against vandalism.	Identification of a designated Management Representative to co-ordinate all decommissioning activities; responsibilities defined for all key internal personnel; authorisation established for all decommissioning activities; and sufficient resources including human resources, skills resources, technological resources and financial resources sufficient to discharge all elements of the closure plan. An assessment of the competency of all internal personnel undertaking works in connection with the discharge of the closure plan will be made where actions are required to manage, assess and verify through inspection or analytical measures. Records of those personnel involved with the closure plan will be kept and line management sign off sought where required.
Awareness of all contractors of site rules for environmental protection	Specific site rules included within contracts and on-site induction for environmental protection will be given to all contractors prior to start of work.
Cleaning out of pipelines, vessels, and plant.	All pipelines, vessels and plant (all above ground) will be cleaned to an appropriate standard to remove pollution potential, with any associated waste materials removed from site through the normal disposal routes. Once cleaned the lines, vessels and plant will be disconnected from the facilities to ensure isolation. An assessment for removal route (relocation, disposal, or sale) will be then made.
Cleaning of processing areas.	The processing areas currently utilised for the Wolfmet Plant will be cleaned to an appropriate standard to remove pollution potential, with any associated waste materials removed from site through the normal disposal routes. Visual

	inspection will validate the areas as decontaminated to a standard to allow area reuse or demolition.
Waste disposal	All waste materials will be appropriately disposed of according to legislation. All disposals will be undertaken in an environmentally responsible manner, favouring reuse, and recycling over disposal. All waste documentation will be retained and verified.
Verification procedure, sign off and record Keeping	All steps in the decommissioning will be verified by a competent company representative responsible for the discharge of the closure programme. All records confirming actions to be identified in advance of the programme being implemented, with record files available and up-to-date as a source of information.
Emergency preparedness	Spill kits/response materials will be present on site. Existing plans and procedures are considered appropriate and will be shared with contractors for their aspects of the decommissioning process.

6 Decommissioning Plan

This decommissioning plan focuses on the main physical assets associated that are associated with the Wolfmet Plant. Through a process of appraisal at each step, the pollution risk has been identified as being associated with the residual materials requiring removal at decommissioning and cleaning of the tanks, vessels, and pipework plus associated infrastructure. Through careful scheduling of the production the raw materials inventory for the site will be run down to the absolute minimum.

Method statements will identify the cleaning methods / decontaminants / cleaning fluids to be used and how the equipment will be dealt with thereafter. Solid and liquid wastes will be therefore handled in compliance with normal waste management practices and procedures at the site using established waste contractors for the site. As no liquid is used directly in the Wolfmet process, no liquid wastes from decommissioning will be generated. Any liquid arising from cleaning or decontaminating equipment will be contained and disposed of appropriately via a licenced waste carrier. There will be no discharge from the facility to site drainage for treatment via a sewage treatment works. A complete log of contractors and records of movements of materials from the site will be retained by the operator.

Materials presenting the greatest pollution risk potential could involve the appointment of competent contractors to facilitate either the removal of residual product or cleaning of the asset. Details of records of appropriate assessments and records including auditing of contractor competence will be requested by the operator and will be retained and made available for inspection if required.

All activities constituting decommissioning of the installation will be verified by visual inspection of the assets by the appointed personnel to confirm that they are free of polluting substances, electrically isolated and made safe from an environmental and health & safety perspective. Any contractors will provide formal documentation to show that all equipment was washed and certified as clean before it can be considered for removal from the site. Full duty of care documentation will be maintained for all materials removed from the site as waste. All disposals will be undertaken in an environmentally responsible manner, favouring reuse and recycling over disposal.

The senior manager responsible for discharging decommissioning will verify that all steps in the programme have been completed and no contamination occurred in both the operational phase of the permit leading up to and through to the end of decommissioning.

7 Site Surrender Application

At the point the business seeks to apply to surrender the EPR permit for the site permit, a Site Surrender Report (SSR) and application documentation consistent with Environment Agency EPR guidance will be completed. This will be done only after the definitive cessation of permitted activities, including the discharge of the decommissioning activities describe above to remove the pollution risks at the

installation. The report will qualitatively assess the soil and groundwater conditions, compared with the existing (SCR), at the point of permit surrender and be submitted to the Environment Agency. The assessment will provide sufficient, relevant, reliable, and unambiguous information to demonstrate that the site has not deteriorated as a result of permitted activities or the decommissioning activities themselves.

Appendix 1 – Site Condition Report 2017