



Decommissioning & Environmental Ltd

SCOTTISH CONTAMINATED LAND FORUM
DECOMMISSIONING – PLANS THAT CAN
INFORM THE REMEDIATION

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5th September 2018

Introduction

- Manufacturing or process facility using a range of chemical materials or potentially polluting materials
- Site to cease production.
- Mothball or for Demolition?
- Rapid decision or time for planning?
- What information is available?
- Advising the Demolition and Remediation

What currently happens

- Pollution Prevention and Control (Scotland) Regs 2012
- PPC Technical Guidance
- Initial Site Conditional Reports
- Env Management Plans
- Site Closure Plan (outline)
- Permit Surrender: Closure Report
- Largely geared towards ground/groundwater



Practical Application (1)

- Site Decommissioning Plan
 - Proposed measures for decommissioning and demolition
 - Aim to avoid the risk of pollution and to remediate land when closure is carried out
- Clear guidance for Nuclear and Non-Nuclear (radiation) sites; Landfill Sites, Oil & Gas (Offshore).



Practical Application (2)

- What happens on sudden closure?
- Closure does not necessarily mean demolition
- Mothballing; - different to closure
- Surrender of WML or PPC permit?
- Operational requirements to make-safe
- Decommissioning plans required to address these eventualities



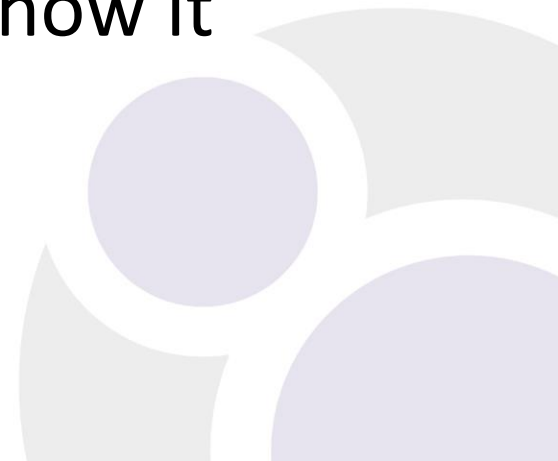
Decommissioning Plan (1)

- Keep it simple
- Use the working knowledge of the operating site
- Practical
- **Not** a
 - Closure report
 - Site Closure Plan (SCP)
 - Conceptual Site Plan
 - Construction and Decommissioning Environmental Management Plan (CDEMP)



Decommissioning Plan (2)

- Great benefit to demolition
- Give significant benefit for the later remediation and/or restart of the site.
- Know what has been done to close/make-safe the site.
- Captures the working knowledge
- How it did operate as opposed to how it should have operated?



Inspiration: Breaking the Enigma Code



Inspiration: Breaking the Enigma Code

John Herivel, 1940

“ We were always concentrating on the encoded messages, and always totally without any glimmer of progress”

Dream:-

A picture of a German Enigma operator early in the morning, the wretched operator is woken to set the new key of the day on his machine. By laziness, tiredness or panic, he chooses the new day's settings as the letters already in the machine's window from the day before.

It was possible to work out how this error could be detected. Subsequent messages could be decoded.

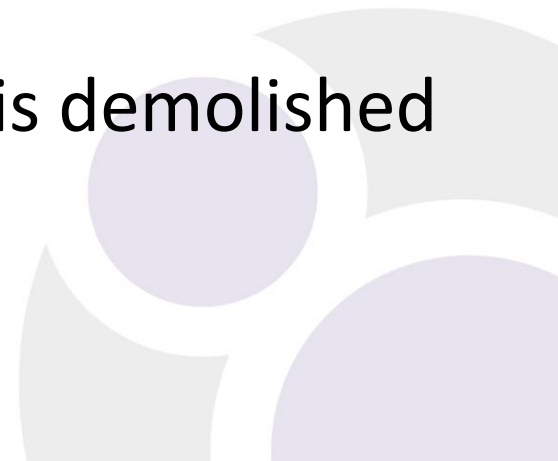
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Site operational

- Production may have been paramount?
- Shorten the shutdown, get back up and running?
- Worry about it later. Not my issue, someone else's.
- Out of spec goes to the mistakes tank
- Problem solving

Initial walk around a site, you get a good feel for how it operated.

You get an even better idea when it is demolished and cleared.



When site closed or mothballed

- Rapidly losing interest
- It will never get re-started
- I'll be long-gone
- It's got no hope of being re-commissioned



Current site status

- Operational Site
 - Side show compared to production
 - Common goal to the end point
- Closed Site
 - Slower priorities
 - Land re-use
 - Handed to a consultancy?
 - What is the fee basis?



For the Remediation

1. Site Condition Reports updated and give information
2. Further SI at closure?
3. Demolition quickly after closure?
4. Decommissioning Plan fills in some gaps and gives a better insight for how the site truly operated and what may be present as a result.





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