



GLS Aluminium Industries Pvt. Ltd.

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	REV. NO.	00
	EFFECTIVE DATE	01/08/2025
	REVIEW DATE	31/07/2026
	SUPERSEDES	NIL

GLS ALUMINUM INDUSTRIES PVT. LTD.

PROCEDURE FOR CLOSURE, DECOMMISSIONING, AND DIVESTMENT

(Aligned with ASI Performance Standard V3 Management)

1. PURPOSE

To establish a systematic framework for responsibly managing the closure, decommissioning, or divestment of **aluminium rolling, annealing, and packing facilities**, ensuring legacy ESG risks are mitigated, stakeholder rights protected, and ASI compliance maintained.

2. SCOPE

Applies to:

- Permanent shutdown of rolling mills/annealing lines
- Decommissioning of packing facilities
- Divestment of operational assets to third parties
- Sites with historical aluminium processing impacts



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3. DEFINITIONS

Term	Definition
Legacy Rolling Impacts	Residual contamination from rolling oils, lubricants, or metal fines.
Annealing Gas Residuals	Leftover N ₂ /H ₂ systems requiring safe purging.
Stakeholder Covenant	Legally binding agreement with communities for post-closure monitoring.

4. RESPONSIBILITIES

Role	Key Responsibilities
Decommissioning Lead	Overall project execution; ASI compliance reporting.
EHS Legacy Manager	Soil/water remediation; waste disposal per EPA 40 CFR.
Community Liaison	Negotiate stakeholder covenants; manage resettlement (if applicable).
Legal Counsel	Transfer liability clauses; regulatory permits surrender.

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5. PROCEDURE

5.1 Planning & ESG Review

Step 1: Facility-Specific Risk Audit

Operation	Critical Audit Areas
Rolling Mills	Hydraulic oil trenches, underground storage tanks
Annealing Furnaces	Residual gas lines, asbestos insulation (pre-2000 builds)
Packing Facilities	Aluminium dust accumulations, solvent storage

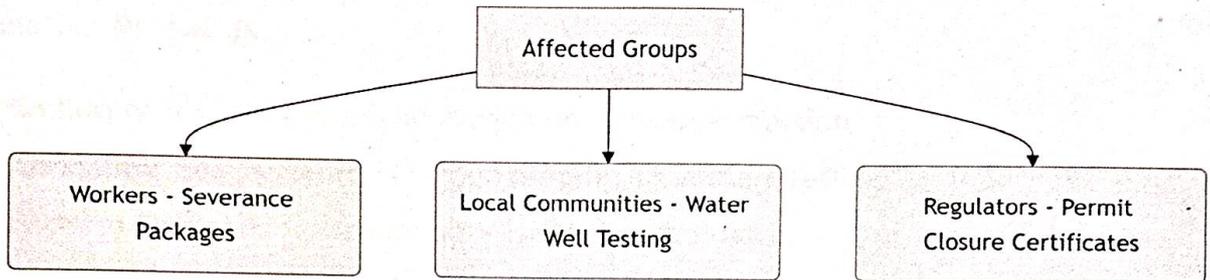
Step 2: Legacy Impact Assessment

- **Environmental:** Soil/groundwater testing for:
 - Total Petroleum Hydrocarbons (TPH) from rolling oils
 - Heavy metals (Cr, Ni) from annealing furnace linings
- **Social:** Document historical community grievances (noise, traffic).

5.2 Stakeholder Engagement

Consultation Framework:

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- **Inclusive Participation:** Co-develop mitigation plans via:
 - Community workshops (min. 3 sessions)
 - Worker transition task forces

5.3 Monitoring & Legacy Management

Post-Closure Monitoring Plan

Risk	Metric	Frequency	Duration
Soil contamination	TPH < 100 mg/kg	Quarterly	5 years
Groundwater quality	Metals below EPA MCLs	Biannual	10 years
Community health	Grievances resolved (%)	Annual	3 years



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Remediation Protocols:

- **Rolling Mill Oil Sludge:** Bioremediation + vapor extraction
- **Annealing Gas Systems:** Nitrogen purging + pressure testing
- **Packing Dust:** HEPA vacuuming > NFPA 484 standards

5.4 Implementation & Compliance

Decommissioning Sequence:

1. **Phase 1 (30 days):**
 - Secure hazardous materials (oils, gases)
 - Distribute worker transition packages
2. **Phase 2 (90 days):**
 - Remove process equipment
 - Initiate soil remediation
3. **Phase 3 (1 year):**
 - Final regulatory sign-offs
 - Stakeholder covenant execution



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6. RISK ASSESSMENT MATRIX

Aluminium Processing-Specific Risks

Risk Category	Identified Risk	Potential Impact	Likelihood	Mitigation Strategy
Environmental	Rolling oil seepage into aquifers	\$2M+ cleanup; ASI decertification	High	Install groundwater interception wells
Social	Mass layoffs without livelihood support	Community protests; legal action	Medium	Skill-retraining programs + severance
Regulatory	Unclosed wastewater permits	EPA fines; future sale blockage	High	Pre-emptive NPDES permit termination
Reputational	Abandoned contaminated sites	Brand damage; investor withdrawal	Medium	Public remediation progress dashboard

7. DOCUMENTATION & DISCLOSURE

- **Public Commitment:** Website disclosure:

"Decommissioning includes 5-year environmental monitoring and community funds. Full plan: [Link]."

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- **Records Retention:**

- Soil test reports: 30 years
- Stakeholder covenants: Permanently

8. TRAINING REQUIREMENTS

Role	Training Focus	Delivery Method
Decommissioning Crew	Hazardous material handling (OSHA 1910.120)	VR simulations
Community Liaisons	Conflict resolution; FPIC protocols	Role-playing workshops

REVISION HISTORY

Rev.	Date	Changes	Approved By
00	01/08/2025	Initial Issue	Mr. Rajesh Singh (C.O.O.)

