



GUIDE DISMANTLING · 15 MIN READ

Planning a plant closure properly — the complete guide

Planning a plant closure: legal basis, scheduling, dismantling phases and documentation. A practical guide for operators and project managers.

The legal framework of a plant closure

A plant closure in an industrial context is subject to a dense web of federal and Land legislation. Operators are obliged to notify the competent immission control authority of the dismantling, or to obtain its approval — depending on the type of plant and the underlying permit. For plants subject to the Federal Immission Control Act (BImSchG), a formal notification of decommissioning under § 15 BImSchG is required at least one month before operations cease.

- Notification of decommissioning under § 15 BImSchG to the competent authority
- Review of the aftercare obligations under § 5 (3) BImSchG
- Obligation to dismantle under the operating permit and building regulations law
- Contaminated land obligations under the Federal Soil Protection Act (BBodSchG)
- Employment law obligations: social compensation plan, notification of collective redundancies to the Federal Employment Agency

Note: Practical note: early consultation with the authorities — Contact the competent permitting authority at least six months before the planned decommissioning. A preliminary meeting allows open questions about aftercare obligations, the obligation to dismantle and any investigations into contaminated land to be clarified before formal deadlines start to run.

Scheduling and milestones

The schedule for a plant closure does not begin with the first demolition excavator, but with the strategic decision to close the site. For medium-sized industrial sites, 12 to 24 months typically elapse between the decision and a development-ready site — and considerably longer for contaminated sites. A realistic schedule takes account of permitting procedures, hazardous-substance investigations, tendering and the operational dismantling phase.

- Months 1–3: strategic decision, site survey, commissioning the hazardous-substance survey report
- Months 3–6: permitting procedure, disposal concept, tendering of the dismantling works
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Months 6–9: hazardous-substance remediation, soft strip-out, disassembly of technical equipment

- Months 9–15: demolition of the building structure, disposal, soil remediation
- Months 15–18: final sampling, documentation, handover of the development-ready site

Note: The critical path: permits — The most common cause of delay is missing or incomplete permits. Make sure that the demolition permit, the hazardous-substance remediation concept and the disposal records are prepared in parallel — not sequentially.

Stakeholder management

A plant closure affects numerous stakeholders, all of whom have to be involved. Structured stakeholder management prevents blockages and creates the conditions for a smooth process. Involving all parties at an early stage — from the workforce and the authorities through to neighbouring municipalities — is decisive for the success of the project.

- Senior management: strategic decision, budget approval, communication strategy
- Works council and workforce: social compensation plan, transfer company, information obligations
- Permitting authorities: immission control, building inspectorate, environmental authority
- Waste management contractors and remediation firms: hazardous-substance register, disposal routes, record-keeping
- Neighbouring municipalities and local residents: information on noise, dust and traffic
- Insurers: dismantling insurance, environmental liability, contaminated land cover

Note: External communication — Actively inform the neighbourhood and the municipality about the planned dismantling. A named contact for residents' questions and a transparent schedule reduce complaints and conflict considerably.

The dismantling phases in detail

Operational dismantling is divided into clearly defined phases that build on one another. Each phase has its own requirements in terms of personnel, equipment, permits and documentation. The sequence is prescribed both technically and legally: hazardous-substance remediation before demolition, soft strip-out before building demolition, soil investigation before handover.

- Phase 1 — site survey: building register, hazardous-substance survey report (asbestos, MMMF (man-made mineral fibres), PAH, PCB, heavy metals), assessment of the building fabric
- Phase 2 — hazardous-substance remediation: professional removal of all hazardous substances in accordance with TRGS 519, TRGS 521 and the GefStoffV
- Phase 3 — soft strip-out and disassembly: removal of technical equipment, operating equipment and installations
- Phase 4 — selective demolition: controlled demolition of the building structure, separation of the material streams
- Phase 5 — disposal and recovery: material classification, maximising the recovery rate, record-keeping
- Phase 6 — soil remediation and handover: decontamination, final sampling, development-ready site

Note: Selective dismantling vs. conventional demolition — Selective dismantling separates materials as the demolition proceeds and achieves recovery rates of over 90 %. It is admittedly more demanding than conventional demolition with subsequent sorting, but it results in lower disposal costs and meets the requirements of the KrWG (Closed Substance Cycle Waste Management Act) regarding the waste hierarchy.

Costs and financing

The cost of a plant closure is made up of numerous individual items and varies considerably depending on the size of the site, the degree of contamination and regional disposal prices. A robust cost estimate requires a qualified site survey — lump-sum quotations produced without knowledge of the site are generally unreliable.

- Hazardous-substance investigation and survey reports: depends on the number of buildings and their year of construction
- Hazardous-substance remediation: the largest single item at contaminated sites
- Demolition and disposal: depends on building volume and material composition
- Soil remediation: highly site-dependent, and considerable where groundwater damage has occurred
- Planning, site management and documentation: typically 8–12 % of the total cost
- Provisions: allow for the unforeseen (contamination, structural problems)

Note: Material revenues as a cost offset — Depending on market conditions, steel scrap, non-ferrous metals and recoverable building materials can offset a considerable share of the dismantling costs. Have the quantities determined before the contract is awarded — the revenues should be taken into account in the overall calculation.

Documentation and record-keeping

Complete documentation is not optional in industrial dismantling; it is mandatory. It protects the client legally, provides evidence of proper disposal and forms the basis for a subsequent declaration of exemption from contaminated land liability. Without complete documentation there is a risk of liability extending well beyond the end of the project.

- Hazardous-substance register and remediation reports with clearance measurement records
- Disposal records: consignment notes, acceptance notes, weighbridge tickets
- Photographic documentation of all dismantling phases (georeferenced and dated)
- Final report with mass balances and recovery rates
- Soil investigation reports and groundwater monitoring results
- Handover record with site documentation and clearance for use

Note: Digital documentation — Opt for digital project documentation with a uniform folder structure, version control and access management. Authorities increasingly expect digital records, and structured documentation makes subsequent information obligations considerably easier to meet.

Standards and regulations

BImSchG

Federal Immission Control Act — governs the decommissioning and aftercare obligations of plants requiring a permit (§ 15 notification of decommissioning, § 5 (3) aftercare obligations)

BetrSichV

Industrial Safety Ordinance — requirements for work equipment and installations requiring monitoring during dismantling (Risk assessment, inspection obligations for lifting gear and scaffolding)

GefStoffV

Hazardous Substances Ordinance — handling of hazardous substances during hazardous-substance remediation and dismantling (Asbestos (TRGS 519), MMMF (man-made mineral fibres) (TRGS 521), heavy metals, PAH)

KrWG

Closed Substance Cycle Waste Management Act — waste hierarchy, obligation to recover, record-keeping (Waste prevention before recovery before disposal, disposal records)

BBodSchG

Federal Soil Protection Act — contaminated land, soil remediation, hazard assessment (Obligation to remediate, trigger values, dismantling of contaminated sites)

ArbSchG / BaustellV

Occupational Safety and Health Act and Construction Site Ordinance — safety on the dismantling site (Obligation to appoint a health and safety coordinator (SiGeKo), risk assessment, fall protection)

Frequently asked questions

How long does a complete plant closure with dismantling take?

For medium-sized industrial sites you should reckon on 12 to 24 months — from the decision through to the development-ready site. At heavily contaminated sites, soil remediation can extend the timescale considerably.

Which authorities have to be involved in a plant closure?

At the very least the immission control authority (notification of decommissioning), the building inspectorate (demolition permit), the lower waste authority (disposal concept) and, where contaminated land is suspected, the soil protection authority. Depending on the site, the water authority and the historic buildings authority may be added.

Can dismantling start before all the permits are in place?

Hazardous-substance investigations and preparatory measures can run in parallel with the permitting procedure. The actual demolition may not begin until the demolition permit has been granted. A soft strip-out is possible beforehand under certain conditions.

Who is liable for contaminated land after the dismantling?

In principle the landowner is liable as the party responsible for the condition of the land, as is the former operator as the party that caused it. A declaration of exemption from contaminated land liability issued by the authority protects subsequent purchasers — it requires complete remediation and gap-free documentation.

Let us talk about your project

Reply within 24 hours on working days.

info@sbs-rs.de

+49 89 541 960 209 Read online: www.sbs-rs.de/rueckbau/ratgeber/werksschliessung-richtig-planen