YORKSHIRE WATER PROJECTS

Environmental Management System (EMS) Summary

Environmental Management System (EMS) Summary

1 - Project Introduction

SGN Gas to Grid ProjectCo1 Ltd. (SGN) proposes to build and operate 2 x new biomethane to grid (BtG) plant within Knostrop Sludge Treatment Facility (STF) & Blackburn Meadows Wastewater Treatment Works (WwTW). Both facilities are proposed to be constructed within the wider Yorkshire Water wastewater treatment works which is owned and operated by Yorkshire Water Services (YWS). Both YWS sites are regulated facilities and the BtG plants will also be regulated facilities, requiring environmental permits to operate. Both facilities will be regulated by the Environment Agency (EA). The area of land that the BtG plants will be built on is being leased to SGN by YWS. YWS is submitting applications on both sites for the 'partial surrender' of this area of land from the present day STF permit boundary.

Biomethane will be produced from treating / upgrading raw biogas, a waste gas generated at the YWS facilities through anaerobic digestion of sewage sludge. Consequently, the BtG plants will be a Directly Associated Activity (DAA) to the YWS anaerobic digestion activity and SGN is applying for a bespoke DAA environmental permits for the BtG plants.

SGN's environment and sustainability policy describes our commitment to drive continuous improvements in our environmental performance and operate our business in a sustainable manner. SGN Gas to Grid ProjectCo1 Ltd, part of the SGN group, is an ISO 14001:2015 certified company. The ISO 14001 standard requires us to establish, implement, maintain and continuously improve an environmental management system (EMS). Our EMS, which considers life cycle perspective, is embedded within our Safety Management Framework (SMF). This procedure describes the way in which we demonstrate our conformance with ISO 14001 2015 by considering our full scope of activities which is available to stakeholders and other interested parties. It is expected through treatment and upgrading of the currently produced biogas across both projects it is expected that approximately 138 GWh of biomethane will be produced annually at these sites once operational in 2025. That is enough to heat approximately 10,000 local properties with renewable energy whilst reducing current emissions from biogas flaring and use in Combined Heat and Power plant.

Both projects proposed will be constructed and commissioned in 2025 and operated over a 20-year term. On completion of the operational phase, the plants may be shutdown and de-commissioned or further extension to operational term should there be continued environmental, commercial, and moral benefit.

2 - Management Procedure for Environmental Management System

SGN Gas to Grid ProjectCo1 Ltd will manage the Environmental Management System in accordance with SGN Safety Management Framework (SMF) procedure - SGN/PM/SHE/60. This has been included in **Appendix 1.** This is in accordance with ISO14001:2015.

SGN Gas to Grid Project Co1 Ltd, part of the SGN group, is an ISO 14001:2015 certified company. The Environmental Management System (EMS) for SGN Gas to Grid ProjectCo1 Ltd will be managed in strict accordance with the SGN Safety Management Framework (SMF) procedure, specifically SGN/PM/SHE/60. Documentation supporting this, in compliance with ISO 14001:2015, has been provided in **Appendix 1.**

3 - Environmental Management System – Contents

The Environmental Management System will include but not limited to the following –

3.1 - Site Plan

Site infrastructure plan drawn to scale showing extents of permit boundary and activities covered by DAA permits. Site Plan will detail all buildings, security fences & storage facilities for hazardous materials like oil & chemical stores, gas bottle storage, storage of waste materials, spill kits & fire extinguisher locations, location of items & equipment for use in accidents and emergencies, entrances and exits that can be used by emergency services.

Site plan will detail the location of mains water, biogas and electricity supplies on site as well as exported biomethane. The site plan will also detail all isolations for mains/potable water, biogas, biomethane and electrical isolations.

Site plan will also detail inspection or monitoring points for sampling and analysis of trade effluent/condensate & emissions to air. Site plan will detail if necessary any vulnerable locations on/or near each site such as rivers or streams.

3.2 – Site Drainage Plan

The EMS will include drainage plan showing surface water and condensate discharge. Condensate/potentially contaminated drainage facilities will be marked in red and surface water drainage facilities marked in blue. The drainage plan will detail the direction of flow of the water in the drain the location of discharge points to the YWS foul water sewer. The site drainage plan will also detail the location of manhole covers, oil interceptors, non-return valves and the location of stop and diverter valves. Discharges will be managed in accordance with **Appendix 4** – SGN/PM/SHE/52

3.3 – Site Operations

The EMS will provide a section detailing Site Operations. This section will detail the day-to-day operations activities carried out onsite – including start up, operation and shutdown activities. Site operations will also detail waste management (see **Appendix 3** – SGN/PM/SHE/50) and storage of materials (in accordance with **Appendix 5** – SGN/PM/SHE/23) – maximum volumes of wastes/raw materials held onsite and the durations in which they will be kept onsite.

3.4 – Fire Prevention

Following fire risk assessment's being undertaken – there may be a requirement for Fire Prevention Plan. The EMS will detail how risk of fire will be prevented and managed in the event of a fire. SGN's EMS will detail how fire risk and prevention is managed through the implementation of **Appendix 13** – SGN/PM/SHE/16

3.5 – Site & Equipment Maintenance Plan

Site and equipment maintenance plan will detail how SGN will maintain the plant, equipment and infrastructure within the site. SGN will maintain all plant and equipment in accordance with manufacturer and supplier recommendations and record and retain all maintenance reports and documentation. Maintenance will be managed by competent person, scheduling of maintenance aligned to minimise downtime and within contractual limits with YW. Site maintenance will be completed to the highest standards in accordance to operating parameters to ensure continued operation in compliance with requirements of the DAA permit.

3.6 – Contingency Plan

SGN EMS will include contingency plan to inform management and impact to the environment in the event of breakdowns, shutdowns, and changes to the normal operation of the biomethane to grid facility.

3.7 - Accident Prevention and Management Plan

EMS will detail procedure for dealing with any incidents or events that could result in:

- Pollution and land contamination – See **Appendix 2** - SGN/PM/SHE/53, SGN/PM/SHE/80
- not being able to comply with DAA permit

The plan must identify potential accidents, for example:

Reporting & Investigation will be managed in line with management procedure **Appendix 7** – SGN/PM/INV/1

SGN will protect and manage impact to habitats through implementation of management procedure **Appendix 9** – SGN/PM/SHE/56

3.8 – Climate Change

EMS will detail SGN's management procedure for climate change in accordance with **Appendix 6** – SGN/PM/SHE/51.

3.9 – Cyber Security

EMS will detail SGN's management procedure for Cyber Security in accordance with **Appendix 8** – SGN/PM/INE/9.

3.10 – Contact Information

EMS will detail if required - SGN's key contact details and procedure detailing display notice showing -

- the permit holder's name (company name at least)
- an emergency contact name and telephone number
- Statement detailing the facility is permitted by the Environment Agency
- the permit number
- Environment Agency telephone number 03708 506506 and the incident hotline 0800 807060 (or another number they subsequently tell you about in writing)

3.11 - Complaints procedure

EMS will detail how complaints are managed, recorded and actions taken to rectify concerns/incidents. All complaints are recorded relating to activities covered by the DAA permit. Complaints are investigated and actions reported inline with management procedure found in **Appendix 7** – SGN/PM/INV/1

SGN typical complaints procedure is detailed below –

You can contact our Customer Service team by emailing greengasenquiries@sgn.co.uk. If you prefer, you can write to us at SGN Customer Service, Stroma Suite, Grampian House, 200 Dunkeld Road, Perth PH1 3GH. Or, you can speak to our Customer Service team by calling 0800 912 1700.

When you contact us, it would be helpful if you could provide the following information so we can deal with your complaint:

- Full contact details (your name, company name (if applicable), address, telephone number and email address)
- Full site location address and postcode
- Any relevant reference numbers or site names or names of who you may have spoken with before contacting us.

We treat all complaints seriously and confidentially. We will fully investigate your complaint in line with our complaints handling procedure, and we will do this in a polite, prompt, and straightforward manner. Your complaint will be reviewed by our Customer Service team or local depot management team. We'll provide a response within 5 working days or 10 working days where a site visit or third-party enquiry is required.

How we aim to put things right -

The different resolutions you can expect are:

- An apology where we have failed to provide a satisfactory level of service.
- An explanation addressing the issue(s) you have raised.
- Where required, appropriate remedial action

3.12 – Competence & Training

EMS will detail SGN's resource management and management procedure for managing competence via SGN's Competence Assurance Scheme. This is managed through implementation of management procedure **Appendix 10** – SGN/PM/SHE/77 & 79

EMS will detail who is responsible and accountable for day-to-day operation of the site and deemed as technically competent to perform roles they carry out in relation to activities covered by DAA permit.

The EMS also details competence reviews completed for staff and contractors as well as training and qualifications for the work performed.

3.13 – Records & Document Control

EMS will detail records kept and duration for retention as required by the conditions of the DAA permit. This may consist of the following if applicable –

- Permits issued to the site from Environment Agency
- Permits & other safe systems of work issued to work parties.
- Risk Assessment & Method Statements
- Management Plans
- Delivery Notes
- Any plans or management plans required by the permit
- Equipment operating, maintenance and certification literature
- Maintenance records
- Staff competence and training records
- Contractor competence and training records
- Emissions, Discharge & Monitoring sample analysis as required
- Compliance records
- Investigation & Reporting documentation
- Record of complaints – investigation and findings in line with SGN/PM/INV/1
- Audit findings, records & action log
- Management plan reviews
- Certification & Conformity Records

Plant & Equipment records will be managed in line with management procedure found in **Appendix 11** – SGN/PM/RE/2

3.14 – Management System Review

EMS will be reviewed as per management procedure in Appendix 1 – SGN/PM/SHE/60

Top management representatives will review our EMS, on an annual basis, to ensure its continuing suitability, adequacy and effectiveness. The review will examine:

- the actions and notes documented from the previous meeting
- a clause by clause review of performance against the ISO14001 requirements
- the external and internal issues that are relevant to and may affect the intended outcomes of the environmental management system along with the potential changing requirements of stakeholders and other interested parties
- Results of audits
- Compliance with regulations/legislation
- Incidents analysis
- Complaints analysis

Performance against environmental objectives will undergo a thorough review of our aspects and the risk and opportunity scores and action plans associated with each item. The outputs of the review will include:

- Confirmation of the continuing suitability of the EMS
- Recommendations for continuous improvements
- Identification of business changes and other external factors that need to be considered for integration within our EMS

- Any implications that may affect the strategic direction of the business
- Recalculated risk scores for aspects

Notes of review including actions, target dates and ownership. The notes and actions arising from the meeting will be circulated to participants and other top managers within 2 weeks of the meeting.

3.15 – Site Closure & De-Commissioning

EMS will detail arrangements and work sequence for deconstruction of the proposed BtG plant. These actions will be put in place prior to de-commissioning an close co-ordination will be carried out between SGN and YWS. The plant will be safely mechanically and electrically isolated and all pipework will be suitably vented to atmospheric pressure and purged with inert gases to make safe. All activated carbon, lubricants and coolants will be decanted and safely removed and disposed of via specialist waste contractors. Following this, BtG plant will be de-constructed and de-commissioned in-line with the SGN Work Instruction found in **Appendix 12** – SGN/WI/PLANT/1 & European standard BS EN 12327:2012 and documented on SGN Decommissioning certificate in-line with requirements of SGN/WI/PLANT/1

Appendix 1 – Management Procedure for Environmental Management System

SGN/PM/SHE/60

Safety Management Framework

Management Procedure for Environmental Management System

June 2017

Management Procedure for Environmental Management System

SGN/PM/SHE/60

Document Owner: Terry Carroll

Issue Date: 6 June 2017

Context

Who is this management procedure for?

This management procedure is aimed at anyone with environmental management responsibilities.

What does this management procedure do?

Our environment and sustainability policy describes our commitment to drive continuous improvements in our environmental performance and operate our business in a sustainable manner.

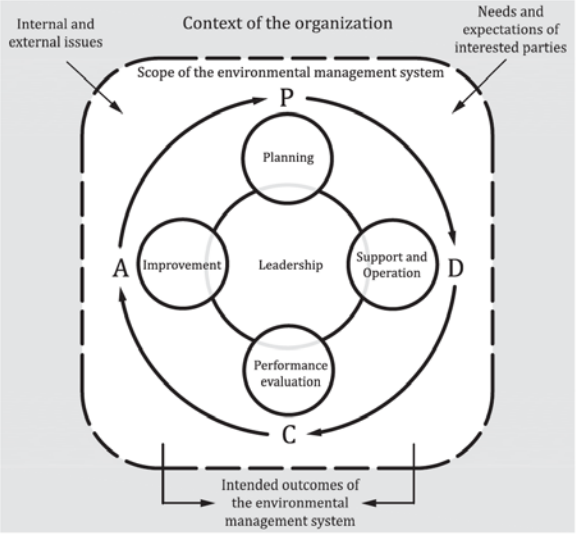
The ISO 14001 standard requires us to establish, implement, maintain and continuously improve an environmental management system (EMS). Our EMS, which considers life cycle perspective, is embedded within our Safety Management Framework (SMF). This procedure describes the way in which we demonstrate our conformance with ISO 14001 2015 by considering our full scope of activities which is available to stakeholders and other interested parties.

Scope

This management procedure is applicable to all of our operations across Southern England and Scotland and the developing network in Northern Ireland.

Why do we need this management procedure?

This management procedure forms part of our Environmental Management System (EMS) and is necessary to comply with our Environmental Standard. The structure of our EMS is based around an internationally recognised model, the components of which are: **Policy, Planning, Implementation and Operation, Checking and Corrective Action and Management Review**. This procedure defines our requirements relating to each of these components.



CONTENTS

Our Environmental Management System

Our EMS, in compliance with the 2015 ISO14001 standard is structured around the following components: Context, Leadership, Planning, Support, Operations and Performance Evaluation.

The Group Head of Safety, Health & Environment, who reports directly to our Network & Safety Director, has “Top Management” responsibility for our Environmental Management System (EMS).

Top Management Responsibilities

The Head of Environment is responsible for ensuring the areas below are delivered.

1. Context of the organisation

- Determine the external and internal issues that are relevant to and may affect the intended outcomes of the environmental management system (EMS).
- Understand the needs and expectations of stakeholders and other interested parties.
- Establish the scope of the environmental management system taking account of all the above, our operational activities, physical boundaries and our ability to influence and control. The EMS scope document available on the Environment pages of SGNnet provides more information.

2. Leadership

2.1 Leadership and Commitment

- The environmental policy and objectives set are compatible with the strategic direction and context of our business
- The EMS requirements are integrated into our business processes
- Environmental staff resources are available to support the EMS
- The requirements of our EMS are communicated throughout the business
- Continual improvement is promoted
- Support is offered to others to help achieve the goals of our EMS
- The EMS delivers the outcomes set

2.2 Environment Policy

Establish, implement and maintain an Environment and Sustainability policy which:

- Will be reviewed annually by a top management representative to ensure it is appropriate to the nature, scale and impact of our activities
- Provides a basis for setting or reviewing objectives
- Includes a commitment to protecting the environment and prevention of pollution and other aspects
- Will be communicated throughout SGN and published on our internal intranet and external web site

2.3 Roles and responsibilities

To remain compliant and meet the ongoing requirements of ISO14001, ensure that environmental roles and responsibilities are assigned to appropriate staff and that regular reports on EMS performance are submitted to our executive committee.

3. Planning

3.1 Actions to address risks and opportunities

- **Environmental Aspects**

A list of activities and their associated environmental aspects (as described in management procedure SGN/PM/SHE/61 – Assessment of Environmental Aspects) must be established, maintained and reviewed annually. This should consider a life cycle perspective, risks and opportunities, planned changes and new or modified business activities.

- **Compliance Obligations**

All relevant sources should be monitored to identify current and proposed legislation, regulatory changes and other best practice requirements. These requirements must be evaluated to determine their impact on our environmental aspects and business. If necessary, action must be taken to ensure compliance. Our EMS must be developed or amended to reflect these requirements as necessary. For further guidance refer to SGN/PM/SHE/62 – Environment Legislation.

a) Identified changes in legislation, or regulatory requirements that impact upon our operations and our EMS must be communicated to all relevant stakeholders and other interested parties.

b) Consultation documents issued by relevant bodies should be identified, reviewed and commented upon in order to influence future legislative, regulatory or other controls which will impact on our business.

- **Planning action**

Address the risks and opportunities stemming from our significant aspects and compliance obligations. This will take account of technological, financial, operational and business requirements and evaluate the effectiveness of these actions.

3.2 Environmental objectives and planning to achieve them

- Establish environmental objectives, considering our most significant aspects which are consistent with our environmental policy, measurable, monitored, communicated and updated periodically. The objectives shall also detail who is responsible for them.

- Develop action plans, in conjunction with the directors who own individual goals, to deliver the requirements of these and their associated targets. These plans will be regularly reviewed and progress, ownership and related matters identified, agreed and documented.

- Ensure the plans to achieve the objectives are considered when developing or reviewing business processes.

4. Support

4.1 Resources

A competent team is established to create, implement, maintain and continually improve the environmental management system.

4.2 Competence

All job roles specify details of the environmental responsibilities.

Employees are briefed on their role, responsibility and authorisation levels in respect of our environmental performance.

All employees, agency staff and contractors engaged in activities and services that have an environmental aspect must be competent to do so. This includes appropriate training and assessment prior to carrying out the activity in accordance with SGN/PM/SHE/63 – Management Procedure for Environmental Training and Competency.

4.3 Awareness

All employees, agency staff and contractors engaged on activities and services identified as having an environmental aspect are made aware of our environmental policy and the impacts associated with their work. In addition, they will be appraised of the benefits of helping us to achieve our objectives and the consequences and risks associated with non-compliance.

4.4 Communication

The most suitable frequency and type of communication is used to update staff and top management. Content will include our EMS performance, requirements and changes to facilitate further improvements.

Appropriate methods and forums for engagement with the workforce are established to facilitate effective open communication of environmental issues.

4.5 Documentation

Our EMS is a fully documented system which incorporates our policy, management procedures and guidance documents and complies with the current ISO14001 standard.

Our EMS contents are shown in the diagram included within Appendix D of this procedure. They are reviewed every 3 years (or sooner if changes are necessitated by legislative or other changes).

The company standard applies in regard to style, titling, layout, font, structure and approval process. EMS documentation is subject to a stringent review process and is stored and communicated via our Digital Documents Database. Finalised documents are issued via a monthly Teamtalk briefing to all staff.

5. Operation

5.1 Operational planning and control

- Review and update EMS procedures to ensure they are compliant and take account of changes in activities within the business. The document review tracker is held in the Safety shared area.
- The output from best practice reviews and local initiatives should be communicated across the business. Amendments should be made to our EMS and other SMF documents if relevant.
- The environmental data required to manage our operations must be identified, including defining arrangements for its collection, analysis and monitoring. This data should be used to track performance against objectives and targets.
- Audits and work place inspections must be carried out at a suitable frequency. Any non-conformances highlighted should be investigated, and corrective action taken. Learning points from incidents, near misses, audit findings and best practice reviews must be captured and used to inform the review of procedures and future activities.
- Undertake 2 yearly program site inspection and Environmental risk assessment (ERA) reviews
- **Network** will carry out ERAs for storage, PRSs and AGI sites.

6. Performance Evaluation

6.1 Monitoring measurement and evaluation

General

- Determine what, where, how and when we monitor, measure and evaluate performance and the effectiveness of our EMS.
- Use our EMS performance data to communicate: internally to our executive board on a monthly basis, to staff and managers on a bi-monthly basis and to OFGEM and other interested parties annually, by means of our regulatory return and annual report.

Evaluation of compliance

- Create, review and update a legislation register to ensure our EMS continues to document its compliance requirements. Changes that have a substantial impact will be communicated and will be considered when reviewing the relevant part of our EMS.

- Our legislation register will be reviewed on a regular basis to comply with the requirement of SGN/PM/SHE 62.

6.2 Internal audit

We conduct internal EMS audits on an annual basis in accordance with a planned programme

The programme specifies time scales and lead auditors who will be competent, objective and impartial. The terms of references will define the criteria and scope of the audits and ensure that the results are communicated to our executive board.

Agreed actions arising from recommendations will be documented and monitored on an on-going basis until implementation can be confirmed.

6.3 Management Review

- Top management representatives will review our environmental management system, on an annual basis, to ensure its continuing suitability, adequacy and effectiveness.
- The review will examine:
    - the actions and notes documented from the previous meeting
    - a clause by clause review of performance against the ISO14001 requirements
    - the external and internal issues that are relevant to and may affect the intended outcomes of the environmental management system along with the potential changing requirements of stakeholders and other interested parties
    - Results of audits
    - Compliance with regulations/legislation
    - Incidents analysis
    - Complaints analysis
    - Performance against environmental objectives
    - a thorough review of our aspects and the risk and opportunity scores and action plans associated with each item
- The outputs of the review will include:
    - Confirmation of the continuing suitability of the EMS
    - Recommendations for continuous improvements
    - Identification of business changes and other external factors that need to be considered for integration within our EMS
    - Any implications that may affect the strategic direction of the business
    - Recalculated risk scores for aspects
    - Notes of review including actions, target dates and ownership.

- The notes and actions arising from the meeting will be circulated to participants and other top managers within 2 weeks of the meeting.

7. Improvement

7.1 General

We identify opportunities for improvement through:

- an annual review of the previous year's environmental performance
- reviewing environmental aspects and developing an action plan to mitigate impact
- the results of internal audits and inspections
- ISO 14001 audits findings
- information received whilst reviewing objectives performance with top management
- staff ideas presented through the IGNITE suggestion schemes
- IEMA and other publications
- meetings with stakeholders and other interested parties
- attendance at exhibitions.

7.2 Nonconformity and corrective action

Incidents that may lead to a non-conformance will be recorded, monitored and investigated through our SEARS system - the process of which is detailed in SGN/PM/SHE/INV1. Those generated from audits and inspections resulting in remedial actions will be tracked through to implementation. Non-conformities will be reported to OFGEM on an annual basis.

To minimise recurrence, learnings from the identification of non-conformances will be communicated to all appropriate parties.

7.3 Continual improvement

Our Environment & Sustainability policy requires us to demonstrate continual improvement. Our environmental goals (objectives) and targets measure and allow us to report on improvements of performance. The returns we make to OFGEM, annually, show how we are performing year on year compared to the other gas distribution networks.

8. Signpost documentation

A signpost document must be produced that demonstrates how all the previously described standards are delivered (see Appendix C). The signpost document will include a diagram demonstrating how and where our management procedures and other documents fit into our overall EMS (Appendix D).

9. Site Managers Responsibilities

Site managers are responsible for ensuring the following:

- Completing a risk assessment prior to carrying out operational activities on fixed and temporary sites. This is to identify and address any site-specific environmental aspects and impacts. Controls must be put in place to reduce risks and the risk assessment must be reviewed every 2 years or sooner if changes to sites necessitate.
- Retaining information relating to hazards, precautions and details of chemicals and other substances (ICE sheets) used by our organisation must include environmental information on their safe use and disposal.
- Undertaking a programme of audits and work place inspections must be established that takes account of the significant environmental aspects and impacts of our business activities.
- Identifying, capturing and retaining of all relevant environmental records to conform to legal, regulatory and other internal requirements.
- Collection and provision of environmental data to the Environment team
- All records associated with the transportation, storage and disposal of waste must be retained in accordance with the requirements of SGN/PM/SHE/50 – Management Procedure for Waste.
- Producing an emergency response plan detailing procedures for the elimination and mitigation of risks associated with onsite activities (refer to SGN/PM/SHE/65 – Management Procedure for Environmental Risk Management). These plans must be reviewed and tested on a regular basis e.g. annually or when significant changes or risks are introduced on site.

10. OTHER REPONSIBILITIES

Those responsible for undertaking actions required to deliver the required responses will receive the necessary information and training in accordance with SGN/PM/SHE/63 Management Procedure for Environmental Training and Competency.

Managers who are responsible for specifying and/or procuring goods and services

- Should take account of a life cycle perspective considering the environmental impacts as a fundamental requirement. For more information refer to SGN/PM/SHE/58 – Management Procedure for Environmental Procurement
- Should ensure that contractors activities are influenced by the contents of the EMS

Network

- Should carry out Environmental Risk Assessments (ERAs) and associated emergency response plans for storage, PRSs and AGI sites

APPENDIX A– References

This Management Procedure refers to the documents listed below

A.1 Internal Documents

EMS Scope	-	Scope overview of our Environmental Management System
SGN/PM/SHE/50	-	Waste Management
SGN/PM/SHE/58	-	Environmental Procurement
SGN/PM/SHE/61	-	Assessment of Environmental Aspects
SGN/PM/SHE/62	-	Environmental Legislation
SGN/PM/SHE/63	-	Environmental Training and Competency
SGN/PM/SHE/64	-	Environmental Reporting
SGN/PM/SHE/65	-	Environmental Risk Management
SGN/PM/A/3	-	Safety, Health, Environmental and Engineering (Process Safety) Auditing

A.2 External Documents

ISO 14001:2015	-	Environmental Management System

APPENDIX B– DEFINITIONS

The definitions applying to this Management Procedure are given below

EMS	-	Environmental Management System
SMF	-	Safety Management Framework

APPENDIX C– EMS Signpost document template

This document provides the template to enable the capture and documentation of the specific details required to support the requirements of SGN/PM/SHE/60 – Management Procedure for Environmental Management System.

This template should be used by nominated managers to improve environmental management and as evidence during ISO14001 surveillance and verification visits.

This template is designed to match the structure of the ISO 14001:2015 standard.

A.3 **Context/leadership**

The Head of Environment will:

- Ensure that the team responsible for the EMS are kept up to date with any changes to external and internal issues.
- Ensure stakeholder interests which could impact on the scope and contents of the EMS are considered through attendance at high level strategy meetings.
- Modify the scope of our EMS which applies to all our depots, offices, PRSs and AGIs in the Southern, Scotland and Northern Ireland areas, if the needs arise from changes described above.
- Provide the required leadership on behalf of the Director of Network and Safety to ensure the EMS is robust, communicated throughout our business and relevant to the strategic direction of the company is taking. It should also deliver the expected outcomes

A.4 **Policy/roles and responsibilities**

Our Environment & Sustainability Policy is located within the Environment section of SGNnet and on our external website. The Environment team structure and responsibilities are set out within the Environment section of SGNnet.

A.5 **Planning**

A.5.1 Environmental Aspects

SGN/PM/SHE/61 contains our assessment of environmental aspects methodology and is held within our intranet site SGNnet.

The SHE & E Document Register database holds all our EMS management procedures and is accessible via SGNnet.

Our Environmental Aspects Register is an excel spreadsheet stored in the Safety shared area and ultimately controlled by the Head of Environment.

A.5.2 Compliance Obligations

Our EMS procedures enable us to comply with legal requirements. We hold a legislation register which is controlled and reviewed in accordance with SGN/PM/SHE/62 - Management Procedure for Environmental Legislation.

A.5.3 Environmental Objectives

Our environmental objectives (goals) and targets are defined within our eight-year ‘Greenplan’, located within the Environment section of SGNnet

A.5.4 Planning action to achieve environmental objectives

The actions, responsible managers, processes and time frames to achieve our goals and targets are located within the action plans linked to the directors that own the goals and are located in the Safety shared drive.

A.6 **Implementation and Operation**

A.6.1 Structure and Responsibility

The Environment team aim to maintain effective environmental management within our organisation. Details of the team structure is held by our HR team and on SGNnet.

A.6.2 Training, Awareness and Competence

Environmental training and competency requirements are set out within SGN/PM/SHE/63 - Management Procedure for Environmental Training and Competency.

A.6.3 Communication

Internal communications include SGNnet, SGN Mail, Teamtalk, Enviroreport, Environment Alerts, Engineering Instructions and Bulletins and SHE Direct.

Information is received, documented and responded to from external bodies in the form of letters, electronic communications.

A.6.4 EMS Documentation

Specific documentation requirements are set out within individual EMS procedures.

Drainage plans, waste transfer documents and site specific waste carrier's licences must be retained at the site along with copies of other waste documentation and discharge consents. In addition, the Environment team and/or Network Asset Management retain copies of discharge consents. Our main annual waste transfer documents and carriers' licences are available on SGNnet.

A.6.5 Emergency Preparedness and Response

The process and instructions that relate to Environmental Emergency Response Plans are contained within SGN/PM/SHE/65 - Management Procedure for Environmental Risk Management. Some templates can be found on the Environment pages of SGNnet.

A.7 **Checking and Corrective Action**

A.7.1 Monitoring and Measurement

Full details of the parameters monitored and measured are set out within SGN/PM/SHE/64 – Management Procedure for Environmental Reporting.

A.7.2 Non-conformance and Corrective and Preventative Action

These are identified through internal and external auditing processes and communicated and monitored in accordance with SGN/PM/A/3 - Management Procedure for Safety, Health, Environmental and Engineering (Process Safety) Auditing.

A.7.3 Records

Records of inspections, environmental risk assessments, waste transfers and other documents, specified within our Safe Environment Handbook, should be retained within the depot or site environmental folder. The Environment team store EMS records in the Safety Shared area.

A.7.4 Environment System Audit

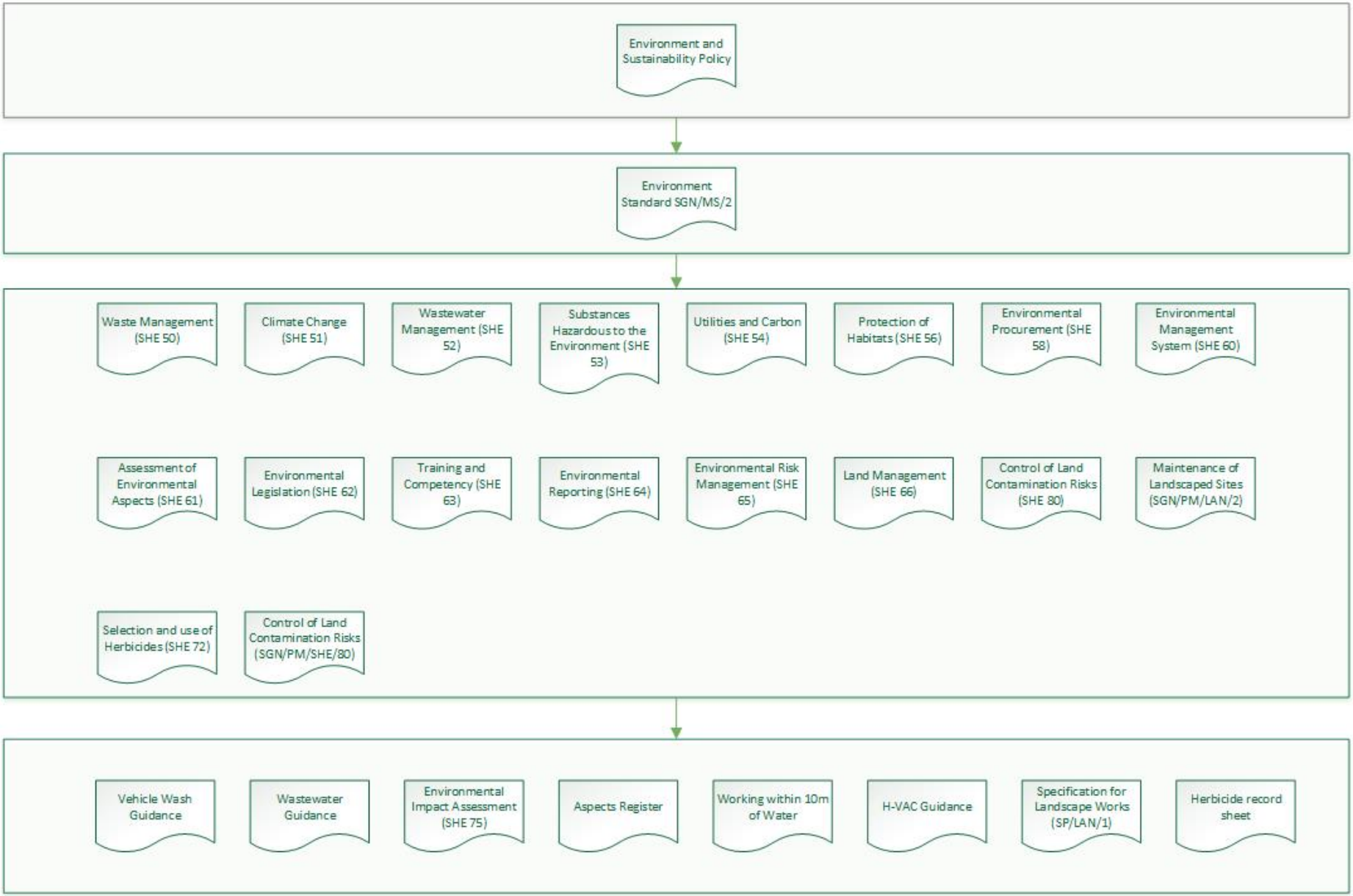
External audits of the EMS are undertaken by our corporate SSE colleagues periodically and non- conformances are monitored and progressed by means of our corporate monitoring system.

Internal audits of specific parts of our EMS are carried out annually as part of the 'Internal Audit and Inspection programme' managed by the Head of Safety Performance. The plan is monitored and progressed by the Safety Performance team. Audits will normally be led by competent auditors who are not responsible for implementing and managing the EMS.

A.8 **Management Review**

A comprehensive management review of our EMS is undertaken annually. Senior management representatives from across our business are invited to review our environmental aspects and discuss the actions from the previous meeting.

APPENDIX D- EMS Organogram



APPROVAL

This Management Procedure was approved by Terry Carroll on the 6th June 2017 for use by managers, engineers and supervisors throughout Scotia Gas Networks (SGN).

SGN documents are revised, when necessary, by the issue of new editions. Users should ensure that they are in possession of the latest edition by referring to the SHE & Engineering Document Library available on SGNnet.

Compliance with this safety and engineering document does not confer immunity from prosecution for breach of statutory or other legal obligations.

BRIEF HISTORY

First published as T/PM/SHE/60	September 2004	
Revised and reissued as SGN/PM/SHE/60	October 2013	
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KEY CHANGES

Section	Amendments
Entire Document	Reorganised and restructured to match ISO14001 2015 standard format.

DISCLAIMER

This safety and engineering document is provided for use by SGN and such of its contractors as are obliged by the terms and conditions of their contracts to comply with this document. Where this document is used by any other party it is the responsibility of that party to ensure that this document is correctly applied.

MANDATORY AND NON-MANDATORY REQUIREMENTS

In this document:

must: indicates a mandatory requirement.

should: indicates best practice and is the preferred option. If an alternative method is used then a suitable and sufficient risk assessment must be completed to show that the alternative method delivers the same, or better, level of protection.

END NOTE

Comments

Comments and queries regarding the technical content of this safety and engineering document should be directed to The SHE and Engineering Registrar at:

engineering.registrar@sgn.co.uk

Buying documents

Contractors and other users external to SGN should direct their requests for further copies of SGN safety and engineering documents to the department or group responsible for the initial issue of their contract documentation.

Appendix 2 – Management Procedure for the Control of Land Contamination Risks & Using Substances Hazardous to the Environment

SGN/PM/SHE/80

Safety Management Framework

Management Procedure for the Control of Land Contamination Risks and Delivery of Land Remediation Projects

August 2024

Management Procedure for Control of Land Contamination Risks and Delivery of Land Remediation Projects

SGN/PM/SHE/80

Document Owner: Neil O'Cuinneagain

Issue Date: 12th August 2024

Context

Who is this Management Procedure for?

This management procedure applies to all employees, contractors and third parties who are involved in the planning and execution of any change of site use on our land holdings, including alterations to, or the installation of plant and equipment, undertaking excavation works and decommissioning or dismantling assets or carrying out land remediation works to address statutory environmental liabilities.

What does this Management Procedure do?

This management procedure describes our requirements with regard to:

- planning works on land where contaminated material or buried structures are suspected of being present;
- discovering suspected contaminated material or buried structures during site works;
- implementing measures to manage any contaminated material and or buried structures encountered; and
- undertaking emergency works in the vicinity of contaminated material.
- Outlines the processes that need to be followed from inception of a planned land remediation project through to completion of the project.

Contaminated material is considered to be any free product (e.g. tars, oils, liquors, etc.) or soil or water that is significantly stained, discoloured or odorous.

Buried structures include underground tanks, pipe work and building foundations where contaminated material may have been historically stored, transported or discarded.

Scope

This management procedure applies to all operations and activities, with particular regard to alterations to and the installation of new plant and equipment, undertaking excavation works, decommissioning, dismantling assets or carrying out land remediation works on our land holdings. Operations, Construction, Network, our contractors and those involved with the support and management of contractor designations who undertake these activities must therefore have regard to the requirements of this procedure.

Why do we need this Management Procedure?

The current and former use of our land holdings, in particular historic gas manufacturing processes, have meant that there is the potential to encounter contaminated material or buried structures when undertaking works on our sites.

Disturbing contaminated material or buried structures can lead to the release of contaminants into the environment whereupon they may pose harm to human health and or the environment. This should be avoided wherever reasonably practicable. However, when unavoidable, appropriate management practices must be put in place to alleviate the risk of harm occurring.

This procedure contains guidance to ensure that we manage contamination risks, comply with environmental legislation, minimise the likelihood of environmental incidents and do not cause harm to human health or the environment.

This Procedure is required to ensure a consistent approach by SGN on all land remediation projects that is in compliance with SGN procedures and any regulation appropriate to the works including the CDM Regulations

CONTENTS

SCOTIA GAS NETWORKS REQUIREMENTS

1. PROJECT PLANNING

The SGN Project Manager is responsible for ensuring the following:

1.1 Environmental risks that are likely to arise from encountering contaminated material and associated buried structures must be identified and managed as far as reasonably practical at the planning/design stage of projects where alterations to, or the installation of, plant and equipment and or excavation works are proposed. A budget must be allocated for dealing with contamination when allocating investment and establishing projects.

1.2 Information about contaminated material and buried structures on many of our land holdings can be obtained from historic site plans, construction drawings, site investigation reports and hazard plans held by Asset Management and/or the Property/Environment team. Both Asset Management and the Property/Environment team must be contacted in the early stages of project planning so that information held about a site can be used to influence the design of proposed works.

1.3 Works should be planned to avoid areas of the site where contaminated materials are anticipated to be present, particularly where contaminated water or semi-fluid tarry materials are likely to be encountered, as the increased mobility of these substances presents a higher risk of an environmental incident.

1.4 If disturbing contaminated material is unavoidable appropriate precautions, identified by a process of risk assessment, must be implemented to prevent harm to human health or the environment. These practices are detailed further in Sections 2 and 3 of this management procedure.

1.5 New plant, equipment and mains should not be located over, under, or within the footprint of historic buildings or structures unless any contaminated material associated with these structures is to be removed to its full vertical extent and a suitable clean corridor is provided to allow the safe use of mechanical plant in the future around new plant and mains. This will ensure that any contaminated material present in such structures is not released into the environment and that future site investigation and remediation activities will not cause disturbance to operational structures.

2. ADDRESSING CONTAMINATION RISKS DURING PROJECT PLANNING

The SGN Project Manager is responsible for ensuring the following:

2.1 A site-specific risk assessment, including the production of a site waste management plan, must be conducted prior to site works commencing. This must consider the possibility of encountering and appropriately managing a range of buried structures and contaminated materials including, but not limited to, those that have strong odours, are stained or discoloured, or have an ashy or tarry composition. A programme of works must be agreed with the Property/Environment team, or an independent competent person, if it is anticipated that disturbance of contaminated material and associated buried structures is unavoidable.

2.1.1 Details of the requirements of a site waste management plan can be found in SGN/PM/SHE/50 – Management Procedure for Waste. The Site Waste Management Plan Regulations 2008 have since been withdrawn and therefore the project value is no

longer applicable, however for all projects where soil or water waste materials may be generated, it is good practice to consider how the waste generated can be effectively managed and provisions must be put in place to ensure that this happens.

2.2 In line with CDM regulations for HSE notifiable projects, encountering contaminated material and how it is to be dealt with must be detailed in the Construction Phase Health, Safety and Environment Management Plan prior to site works commencing.

2.3 Appropriate PPE, welfare facilities and waste management provisions identified by the site-specific risk assessment must be made available at the site prior to works commencing to ensure that contaminated material can be managed effectively (refer to Section 3 for more information). When setting up the site, “clean” and “dirty” areas should be designated in accordance with procedures/competent support and input from the SHE team.

2.4 Where buried structures are encountered, the structure must not be breached. If encountering the structure was not expected then site works must cease immediately and the Environment team or competent person consulted so that a programme of works can be agreed that will ensure that harm to human health or the environment is avoided. Such works may consider the possibility of removing the structure where possible or finding a suitable work around leaving the structure in-situ.

2.5 Where a buried structure is to be left in-situ a detailed photographic record must be made and the location of its exposed extent must be recorded to within 1m accuracy by GPS and surveyed to AOD (Above Ordnance Datum). The resulting co-ordinates must be provided to the Environment team to enable them to update their records and be able to locate the structure at a future date when the site comes to be characterised as part of our statutory site investigation work.

2.6 Where any contaminated material is discovered that had not previously been anticipated, site works must cease until such a time as a risk assessment has been undertaken and appropriate control measures identified in the assessment have been implemented at the site.

2.7 The Environment team must be informed of any contaminated material that has been unexpectedly encountered by site works so that risks can be assessed and records updated.

3. MANAGING CONTAMINATION RISKS ON SITE

Any contaminated material encountered on our sites is likely to be in the form of excavated material and spoil, free product or trench water. Measures to deal with buried structures are not covered in this section as they must be addressed on a site-by-site basis in consultation with the Environment team, as detailed in Section 2.

The Project Manager is responsible for ensuring the following:

3.1 Site induction should be provided for all operatives and visitors. This should include specific reference to minimising entry and exit to excavations, using mechanical plant in preference to hand-digging where safe to do so and in accordance with our safe digging practices, no eating or drinking in “dirty areas”, decontaminating all plant and equipment after use and safely disposing of contaminated equipment. The provision of wheel and vehicle washing facilities should also be considered in the risk assessment and method statements.

3.2 Excavated materials must be carefully managed in order to comply with environmental legislation and waste management requirements. The composition of the material being excavated and its suitability for re-use or disposal must be established.

3.3 Material composition should always be ascertained by a series of trial holes excavated from proposed areas of work as a preliminary stage of a planned project.

3.4 Excavated materials must be appropriately segregated according to composition and stored in covered/sealed skips or in designated stockpile areas of like materials. These areas must prevent run-off or escape of any contaminants. This may be achieved by covering excavated materials to prevent rainwater infiltration and bunding or lining stockpile areas with polyethylene sheeting in accordance with the site waste management plan.

3.5 Excavated materials should be taken directly to stockpile areas to minimise the possibility of spread of contamination across site. To ensure that this is achieved it may be appropriate to directly load dumpers rather than store spoil beside trenches.

3.6 Where materials suspected of being contaminated have come into contact with the site surface, a “surface scrape” should be undertaken to ensure that potentially contaminated material is not left at the site surface on completion of the works.

3.7 Where excavated materials are suspected of being contaminated they must not be used as backfill without first being WAC (Waste Acceptance Criteria) tested to establish whether the material constitutes hazardous/special waste and is therefore suitable for onsite re-use or offsite treatment and disposal.

3.8 If free product or large volumes of water suspected of being contaminated accumulate in excavations, they must not be discharged back into the environment. They must instead be pumped to a suitable container or tanker before being treated onsite or disposed of off site as wastewater.

3.9 Waste disposal must be undertaken by competent licensed persons and accompanied by the appropriate completed consignment/transfer notes. Copies of all sampling results and waste transfer documentation must be provided to the SGN responsible manager/project manager.

3.10 When working on sites that are not owned by SGN and material suspected of being contaminated is encountered, the landowner must be contacted and works stopped until an agreement has been reached to allow the works to proceed safely. Any instruction to proceed must comply with the details provided in this section procedure.

4. ADDRESSING CONTAMINATION RISKS DURING EMERGENCY WORKS

The Team Manager is responsible for ensuring the following:

4.1 Any emergency situation must be rendered safe with minimal disturbance to contaminated material and buried structures by taking account of the guidance provided in this management procedure.

4.2 Wherever possible, emergency and repair works should look to relocate/reroute infrastructure away from contaminated material and or buried structures, unless contamination can be removed as part of the works. This may result in a temporary repair being made before a permanent solution can be adopted in consultation with the Environment team.

4.3 Where contaminated material and/or buried structures have been disturbed in the course of resolving an emergency situation, measures must be put in place to prevent the escape of contaminants into the environment. At the earliest opportunity the Environment

team must be contacted so that any further risk to the environment can be assessed and managed appropriately.

5. Carrying out Land Remediation Works - Roles and Responsibilities

1.1. CDM Roles

Reference should be made to SGN/PM/SHE/03 Management Procedure for the Construction (Design and Management) Regulations 2015.

Client – SGN Senior Property Operations and Land Quality Manager on behalf of SGN.

Principal Designer.

- Pre-Tender - either SGN independent CDM Advisor or SGN Project Manager on behalf of SGN
- Post Tender – Land Remediation Contractor.

Principal Contractor – Land Remediation Contractor

CDM Site Co-ordinator - this is an SGN identified role detailed within SGN/PM/SHE/03 section 5.7. This role is fulfilled and nominated by the Principal Contractor.

Note All CDM appointments must be in writing and the SGN Senior Property Operations and Land Quality Manager will be responsible for ensuring these formal appointments are documented.

1.2. SGN Roles

SGN Senior Property Operations and Land Quality Manager

Responsible for the overall management of the land remediation programme and coordination with other departments within SGN as required to agree a property strategy and enable safe remediation works.

Responsible for appointments of Principal Contractors and Principal Designers

SGN Project Manager

Responsible for obtaining all preconstruction information, preparation of Project Works Information and Site Information documents, agreeing with Maintenance Manager the plant protection and SCO requirements and overall management of the Principal Contractor

SGN Maintenance Manager

Responsible for agreeing protection to live gas assets.

SGN Plant Protection Officer

Responsible for plant protection of live gas assets below 7bar.

SGN Stakeholder Manager

Responsible for managing key stakeholders affected by the works.

6. Delegated Financial Powers

All works must be financially controlled in accordance with the SGN investment committee guidelines.

7. Property Strategy

At the inception of a planned land remediation project a property strategy must be identified if available to ensure the project is able to deliver the overall outcome required by SGN for the

site. The sales manager for the site is responsible for the delivery and maintenance of the property strategy.

Things to consider in the property strategy are;

- End use of the land
- On site buildings rationalisation (Which buildings/structure will be retained or dismantled)
- Gas plant rationalisation (including working with the governor replacement programme)
- Communication masts, aerials and dishes
- Programme requirements
- Stakeholder engagement
- Heritage requirements
- Security requirements
- Condition site to be left in on completion (e.g. record of services, surfacing, backfill, fencing and vegetation)
- Key site constraints affecting property strategy.

8. Advanced Works

When planning land remediation projects, advanced works should be considered by SGN to obtain necessary pre-construction information and to enable acceleration of the programme where appropriate. Examples of possible advanced works to be considered include: -

- Services survey- to identify all live services on site including depth of gas mains that could be impacted by the works.
- Environmental site investigation
- Pre demolition asbestos survey - for all elements scheduled for dismantling to support land remediation works.
- Water analysis
- Ecology survey
- Plant relocation
- Mast relocation
- Vegetation clearance

9. Provision of Information

The CDM regulations require the client to provide relevant pre-construction information. A list of typical information required is listed below. This list is to be considered on all projects but should not be considered exhaustive.

The pre-construction information must also include relevant SGN specifications, policies and guidance unless previously provided in the framework documentation.

Where pre-construction information is not available, The SGN Client must arrange for the relevant surveys to be undertaken. It is preferable that the surveys are undertaken prior to going to tender, however where considered appropriate, by the Client, it will be acceptable for the responsibility for the survey to be passed to the Principal Contractor with sufficient time for the Principal Contractor to take the information into consideration in the preparation of the Construction Phase Plan

Suggested preconstruction Information:-

- Holder isolation certificates and associated drawings

- Electrical isolation certificates and associated drawings
- Asbestos surveys
- Site plan(s) showing the location of live gas apparatus and electrical apparatus/cable plans.
- Information about occupied buildings on site or immediately adjacent to site, in particular places of public assembly [e.g. schools] that might be at risk from land remediation operations or groundworks
- Drainage plans
- Gasholder tank water analysis (where applicable)
- Paint analysis
- Pre demolition asbestos survey
- Typical sludge analysis or, if possible, site-specific analysis (where applicable)
- Topographical survey
- Holder No.1 sheets or equivalent information
- Latest holder inspection records
- Available services plans
- Existing discharge consents
- Hazardous area drawings
- Historic records of holder and tank
- Site investigation reports
- Phase 1 ecology survey (see SGN/PM/SHE 56)
- Wayleaves for 3rd Parties e.g. masts, hoarding, tenants etc.
- Site specific hazards identified by SGN and their consultants during the pre-tender period.
- Where established the arrangements for protecting SGN live assets/plant

Additional SGN procedures which the Principal Contractor will be expected to comply with to be provided including the following.

- SGNs Safe Control of Operations procedures
- SGN/PM/SHE/03 Management Procedure for the Construction (Design and Management) Regulations 2015
- SGN/PM/INV1 Management Procedure for incident reporting and investigation
- SGN/PM/SHE/76 Management procedure safety health and environmental management of contractors
- SGN/WI/SW/2 Work Instruction for Safe Working in the Vicinity of Pipelines & Associated Installations with maximum operating pressure >7barg
- SGN/WI/SW/1 – Parts 1 to 3 – Deep excavation requirements
- SGN Stakeholder document titled Holder Dismantling Best Practice Document
- Specification for Gasholder Tank Dewatering and Infilling

10. SGN Permitry Requirement and Plant Protection

The Principal Contractor must have in place his own appropriate procedures and safe system of work for hazardous activities and operations which must include a Permit to Work system for high hazard activities. These activities typically include:

- Where activities on site must be controlled to prevent one activity causing a risk of danger to another or to avoid a danger to persons not directly involved in an activity
- Where only specified competent persons can undertake an activity
- Working in confined spaces [including inside a gas holder]
- Work in deep excavations
- Hot works where fire prevention controls are required

- Lifting operations over people or occupied buildings or work areas
- Lifting operations involving two or more cranes/machines
- Work at heights outside of scaffolding or existing or temporary access platforms and stairways, or where guard rail systems are not in place when work is being carried out [i.e. personal fall arrest equipment is the primary fall prevention system]

Principal Contractors Permit to Work systems must have passed an assessment in accordance with SGN/PM/SHE/76 Appendix C.

The Principal Contractors Permit to Work system must also be applied to sub-contractors activities.

Land remediation activities are likely to have live gas apparatus within or adjacent to the area where land remediation works are required. SGNs live gas apparatus including gas mains, pipes, electrical supplies and auxiliary equipment including instrumentation cables and controls must be protected from damage during land remediation works. All works that could cause damage to this apparatus must be authorised by the SGN Project Manager or person responsible for that site. Consideration must be given to preparing an emergency contingency plan where it is foreseeable that live gas apparatus could be damaged and the site Maintenance Manager must be consulted. In addition, SGN plant protection should be consulted for any live gas assets below 7 bar and gas mains pegged and marked out on site where necessary. Adherence to SGN procedure SGN/PM/SW/3 (Safe use of mechanical plant for excavation works) should be always undertaken.

The SGN Project Manager must provide the Principal Contractor with plans showing the location of known gas apparatus including buried apparatus and buildings/pits containing apparatus. Areas of the site containing live gas apparatus must be marked as RED areas. The Principal Contractor must provide the SGN Project Manager with site specific risk assessments and proposed method statements to undertake the work safely and without causing damage to gas apparatus. Consideration must be given to intended and unintended consequences. The SGN Project Manager will determine in conjunction with the site Maintenance Manager what, if any, additional precautions are required to protect apparatus and whether an SGN Permit to Work is required to authorise those works. A SGN Permit to Work will be required in RED areas under the following circumstances:

- Lifting operations over live apparatus
- Hot works
- Excavation work
- Work in confined spaces [where the hazard or potential hazard is gas from SGNs gas apparatus]
- Where a contingency plan is required for an emergency
- Where there is a foreseeable risk of gas apparatus being damage, including by unintended consequences.

SGN Permits to Work must be issued in accordance with SGNs Safe Control of Operations (SCO) procedures. The Principal Contractor will nominate suitable persons and provide evidence of competence for them to be registered on SGNs SCO Competent Persons register to receive an SGN Permit to Work.

Permits to Work should only be issued when it is confirmed that the controls required to prevent incidents are in place.

In addition to the above all works in the vicinity of high-pressure gas pipelines and installations must be notified to the Maintenance/Pipelines Manager and be undertaken in accordance with SGNs procedure SGN/WI/SW/2. This applies if there is a high-pressure gas pipeline anywhere on site or adjacent to the site.

Arrangements for construction vehicles to cross live gas apparatus must be agreed with the SGN Project Manager who should consult with the Maintenance Manager. A ground survey

using site plans must be conducted to identify valves, standpipes, duct chambers, etc. to ensure these are avoided or protected; this may require hand excavated trial holes to confirm the position of such apparatus. Designated crossing points must be demarcated and it may be necessary to install protective measures such as road plates or beams to spread the load of heavy vehicles. A Permit to Work is not required for vehicle crossings unless deemed so by the SGN Project Manager. Protective measures over high pressure gas pipelines must be installed in accordance with SGN/WI/SW/2.

For other utility apparatus not associated with live gas apparatus the Principal Contractor must consult with the operator/owner. This process must commence at project inception.

A system for designating which areas of a site contain live gas apparatus that could be affected by the works is described below and must be applied for all sites. This will be determined in the preconstruction phase, but updated as work starts and progresses.

- During an initial site walkover between the SGN Project Manager and, where appropriate, a relevant SGN Maintenance and Asset Manager the extent of live gas plant including buried gas pipes/mains in and around the land remediation area and other structures scheduled for dismantling to support the land remediation works must be reviewed and the potential for the works to impact on the gas supplies discussed and recorded on a project risk register. Any specific requirements of the Maintenance Manager or Asset Manager with respect to plant protection should be recorded for inclusion in the Scope of Works
- Following the initial walkover the SGN Project Manager should prepare a site drawing/plan illustrating the locations of live gas apparatus [Red areas].
- The Red areas must be clearly outlined to the tenderers in the preconstruction information see section 5
- The tenderers submission must include details of how SGN assets will be protected in the Red areas. See section 8
- The Principal Contractor must advise the SGN Project Manager of any crossing of live gas apparatus by heavy plant or excavation works within 3m of any gas apparatus. The SGN Project Manager will liaise with the Maintenance Manager regarding any special precautions required and take account of the requirements of SGN/WI/SW/2.
- Prior to the Principal Contractor mobilising to any site the construction phase CDM H&S plan must be reviewed by the SGN Project Manager and when considered adequate a Works Commencement Authorisation Certificate finalised and issued, signed by the SGN Project Manager and Senior Property Operations and Land Quality Manager

11. Hazard Identification and Risk Elimination or Minimisation

SGN must not place sole reliance on the Principal Contractor to identify hazards and risks. The process of hazard identification and risk elimination starts at project inception. The SGN Project Manager is responsible for identifying and recording potential hazards and risks that may impact on the land remediation works at the start of the project. This process must be recorded. The recommended process at the pre-tender stage of the project is as follows:-

- Initial site walkover by SGN Project Manager, with representatives from SGN Maintenance Manager, SGN Network Manager, SGN Asset Managers where appropriate and any appointed CDM Advisor during which potential hazards should be discussed.
- Hazard identification meeting following which a Risk Register document should be prepared Hazards and risks should be tracked during the pre-tender phase and any residual hazards/ risks passed to tenderers in the Pre-Construction information, contained within the Project Works Information, in order that they can address them.
- The Principal Contractor must take responsibility for assessing all hazards and controlling all risks identified at tender stage together with the risks arising from their land remediation procedures and take account of all such risks in their site-specific risk assessments and method statements.

12. Contractor Appointments and Management

SGN have a framework contract for dismantling and land remediation contractors that should be used for all land remediation projects. The selection and management of contractors is governed by SGN/PM/SHE/76 and the contractors are identified as Non-embedded Contractors.

SGN must be notified in advance and withhold the right to refuse sub-contractors if they are not deemed suitable or competent.

The SGN appointed Principal Contractor is responsible for managing and supervising and monitoring the sub-contractor(s) even if they are working on site before or after the Principal Contractor's own activities start/finish on site.

The tenderers must be provided with all the full Project Works Information, Site Information and the required Preconstruction Information. If there are any significant omissions in the information this must be brought to the attention of the tenderers together with the proposals to rectify the omissions.

All tenderers must attend a tender walkover with the SGN Project Manager. During the walkover key hazards, including SGN operational assets, must be brought to the attention of the tenderers. Tenderers must be asked to identify how all the key site specific hazards and risks are going to be managed within their tender submissions.

Tender appraisals must review how each tenderer has taken account of key site hazards and risks in their submission. Shortlisted contractors should be invited to interview where they can present their proposals for the project in more detail and both parties can seek clarification over any queries.

The tenderers will be expected to provide a detailed programme of works at time of tender covering all key activities including mobilisation, land remediation key stages, subcontractor activities demobilisation and reporting. In addition, the tenderers must provide a programme for HS&E inspection and auditing.

Principal Contractor must have in place procedures to cover high risk activities and environmental risks that meet the following of our standards. :-.

- Safe Working >7 bar assets Ref SGN/WI/SW/2 Work Instruction for Safe Working in the Vicinity of Pipelines & Associated Installations with maximum operating pressure >7barg
- Safe Use of Mechanical Plant Ref SGN/PM/SW/3 Management Procedure for the Safe Use of Mechanical Plant
- Work at Height: - Ref SGN/PM/SHE/27 Management Procedure for Work at Heights
- Work in Confined Spaces: Ref SGN/PM/SHE/18 Management Procedure for working in confined spaces (including gaseous or potentially gaseous atmospheres
- Lifting Operations - Ref SGN/PM/SHE/14 Management Procedure for Lifting Operations

- Waste: Ref SGN/PM/SHE/50 Management Procedure for waste
- Waste Water: Ref SGN/PM/SHE/52 Management Procedure for waste water
- Protection of Habitats Ref SGN/PM/SHE/56 – Management Procedure for Protection of Habitats

On appointment of a successful Principal Contractor, an initial team meeting must take place. This meeting should be minuted by SGN and attendees to include representatives from, SGN Project Manager, SGN Stakeholder Manager, SGN Maintenance Manager where appropriate, Principal Contractor plus other as required.

Either the SGN Project Manager or an independent CDM Advisor, suitably qualified and having relevant experience must review the Construction Phase Plan. When the Plan is considered adequate a Works Commencement Authorisation Form can be finalised and issued.

Ongoing Management of the Principal Contractor and their subcontractors must be in accordance with SGN/PM/SHE/76 [Non-embedded Contractors] and all relevant risk assessments and method statements must be evaluated by the Project Manager in advance of each site activity. Key risks to consider will include, Work at Height, Confined spaces and Lifting operations.

13. Site Security and Induction

The Principal Contractor is responsible for controlling access to the land remediation area/site.

The land remediation area may be part of a site used by SGN personnel for maintenance of gas apparatus or it may be part of a site occupied by SGN. In these circumstances the Principal Contractor is responsible for controlling access into the land remediation works area to prevent unauthorised persons entering the land remediation works. If necessary, security fencing must be used to control access and warning signs must be displayed. Any person entering the land remediation works area must be inducted by the Principal Contractor and recorded in the visitor's log. SGN personnel are expected to cooperate fully with the Principal Contractor's arrangements and the Principal Contractor must escalate any concerns to the SGN Project Manager.

The Principal Contractor must provide a health and safety induction for all visitors to site and a record of visitors must be kept. A general health and safety induction briefing only needs to be provided once to any person, however, an induction briefing must be given each day to any visitors on the activities ongoing that day and any specific safety hazards and precautions that they should be aware of for their visit, including areas where access is not permitted.

14. Stakeholder Engagement

Stakeholder engagement is a key requirement of SGN Holder land remediation projects. The Stakeholder team should be involved at the project initiation stage through to project completion.

Expectations regarding stakeholder engagement will be set out at the tender stage and it is expected that the Principal Contractor complete these requirements.

SGN must also ensure appropriate notifications/consents are completed in relation to Local Authorities, Emergency Services, HSE, Water Authorities etc.

15. Environmental Management

All contractors that are on the SGN framework must have an ISO14001 accredited Environment Management (EMS). Site environmental management files containing all relevant documents, including evidence to demonstrate that environmental risks have been assessed and minimised, and that waste is being stored and removed compliantly should be audited by the Principal Contractor on a regular basis. In addition, regular site inspections must be carried out by the SGN Project Manager, an appointed CDM Advisor or representative of SGN H&S Department to confirm the acceptability of welfare, other facilities and environmental controls such as storage of hazardous liquids. To comply with our Environment and Sustainability Policy. Waste transferred to land fill sites should be minimised, the use of recycled aggregates should be maximised, fuel, energy and carbon produced should be monitored on site and the business carbon footprint of all operations should be minimised. All works on site should comply with the requirements of our EMS.

16. Supervision and Inspection/Audit Requirements

The Principal Contractor must have a full-time appointed site Manager who must be on site at all times when work is being carried out unless a delegated appropriate alternative is agreed with SGN Project Manager

The Principal Contractor must carry out sufficient inspections and audits to ensure HS&E is managed appropriately on their projects including works undertaken by sub-contractors. SGN must receive, copies of audits from the Principal Contractor at the frequency required by their audit programme.

SGN should carry out sufficient monitoring and health safety and environmental inspections to satisfy themselves that the works are being adequately managed. As a minimum the sites must be monitored on a weekly basis by the SGN Project Manager or his designated representative and formally inspected, by SGN, on a monthly basis by a suitably competent person with respect to Health Safety & Environment.

Tenderers must submit their proposed audit and inspection programme at the tender stage and they must specify the arrangements for daily supervision of the works.

17. Site Meetings

During land remediation, site meetings should take place on a monthly basis but to suit work activities, chaired by the SGN Project Manager or Senior Property Operations and Land Quality Manager. The meetings should be minuted.

18. Handover Documentation

There are 2 key requirements for Handover Documentation

1) H&S File as defined in CDM Regulations 2015
2) Close Out Documentation demonstrating the projects has been carried out in accordance with the specification of works (including backfilling) best practice and relevant legislation.

19. Review Process/Lessons Learned

On completion of a project SGN should arrange a project review meeting to enable parties involved in the project to discuss what went well and what did not go well and to enable lessons to be learnt for future projects.

Appendix A – REFERENCES

This Management Procedure makes reference to the documents listed below.

A.1 Internal Documents

SGN/PM/SHE/76	-	Management procedure safety, health and environment management of contractors
SGN/PM/ SHE 03	-	Management Procedure for the Construction (Design and Management) Regulations 2015
SGN/PM/SHE/18	-	Management Procedure for working in confined spaces (including gaseous or potentially gaseous atmospheres
SGN/PM/SHE/14.6	-	Management Procedure for Lifting Operations
SGN/PM/INV1		Management Procedure for incident reporting and investigation
SGN/PM/SHE/50		Management Procedure for Waste
SGN/PM/SHE/52		Management Procedure for Waste Water
SGN/WI/SW/2		Work Instruction for Safe Working in the Vicinity or Pipelines and Associated Installations operating >7bar
	-	
SGN/PM/SHE 56	-	Management Procedure for the Protection of Habitats

Appendix B – DEFINITIONS

The definitions applying to this Management Procedure are given below

AOD	-	Above Ordnance Datum
Buried structures	-	Include underground tanks, pipe work and building foundations where contaminated material may have been historically stored, transported or discarded.
Contaminated material	-	Any free product (e.g. tars, oils, liquors, etc.) or soil or water that is significantly stained, discoloured or odorous.
WAC	-	Waste Acceptance Criteria

APPROVAL

This Management Procedure was approved by Neil O'Cuinneagain on 12/08/2024 for use by managers, engineers and supervisors throughout SGN.

SGN documents are revised, when necessary, by the issue of new editions. Users should ensure that they are in possession of the latest edition by referring to the SHE & Engineering Document Library available on DigitalHub.

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BRIEF HISTORY

First published as SGN/PM/SHE/80	January 2014	DESC-1411-17012014
Re-issued	August 2024	SMF-1544-12082024

KEY CHANGES

Section	Amendments
All sections	Updated where relevant any references to current SGN management procedures
New section	Included sections 5 onwards to describe how a land remediation projects should be delivered from inception through to completion

DISCLAIMER

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MANDATORY AND NON-MANDATORY REQUIREMENTS

In this document:

must: indicates a mandatory requirement.

should: indicates best practice and is the preferred option. If an alternative method is used then a suitable and sufficient risk assessment must be completed to show that the alternative method delivers the same, or better, level of protection.

END NOTE

Comments

Comments and queries regarding the technical content of this safety and engineering document should be directed to The SHE and Engineering Registrar at:

engineering.registrar@sgn.co.uk

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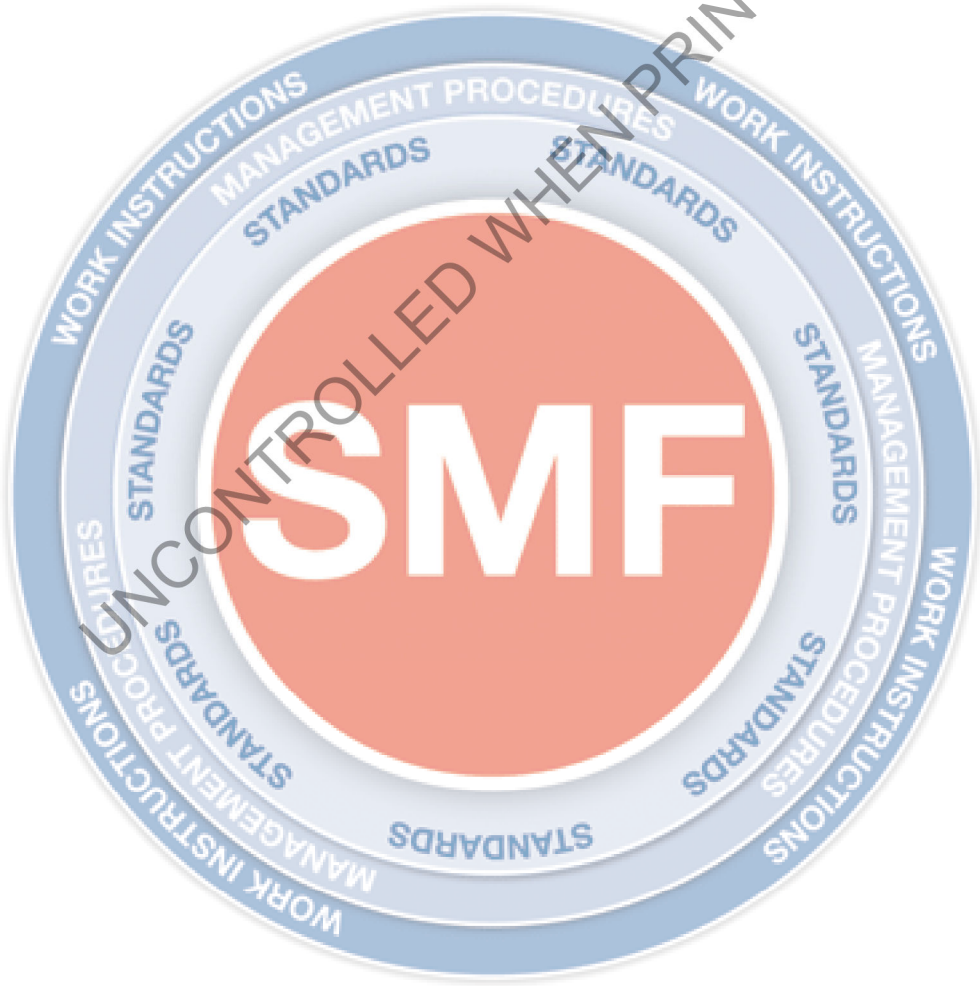
SGN/PM/SHE/53

Safety Management Framework

Management Procedure for Using Substances Hazardous to the Environment



JUNE 2017

Management Procedure for Using Substances Hazardous to the Environment

SGN/PM/SHE/53

Document Owner: Terry Carroll

Issue Date: 6th June 2017

Context

Who is this Management procedure for?

This procedure applies to all employees responsible for selecting, using, or overseeing the use of substances hazardous to the environment.

What does this Management procedure do?

This management procedure describes our requirements to eliminate or minimise the potential to cause harm to the environment (including wildlife, watercourses, groundwater, air, land and property) when working with, or storing, hazardous substances used as part of our operations.

Scope

This management procedure applies to all operational activities associated with the selection and use of hazardous substances, including at both fixed and temporary sites. A hazardous substance is deemed to be any material, solid or liquid, that has the potential to cause harm to the environment, either as a consequence of its chemical or physical properties or as a result of the volume that may be handled. Consult your Safety handbook for further guidance on safety considerations when using hazardous substances.

Why do we need this Management procedure?

A key principle of UK environmental legislation is the concept that 'the polluter pays'. This means that we are responsible for addressing any significant environmental damage caused by our activities. Using substances hazardous to the environment poses a risk, as by their very nature, these materials are likely to cause considerable harm to the environment if their use is not carefully controlled. Incidents where poor practice using hazardous substances have led to major pollution incidents in the past have resulted in significant reputational damage for those responsible, and normally entail considerable clean-up costs. It is therefore important to avoid or minimise, and control, the use of hazardous substances during our operations.

CONTENTS

1. Using hazardous substances

1.1 All managers must ensure that when designing, planning and supervising operational activities the use of hazardous substances is minimised.

Where the use of hazardous materials is unavoidable, activities must be controlled in the following order of priority:

(a) Eliminate the use of the hazardous substance wherever feasible;

(b) Substitute the hazardous substance with a non-hazardous or less hazardous substance or technique;

(c) Minimise the amount of the hazardous material purchased, used and disposed of as waste. Wherever possible, neutralize the hazardous waste produced in accordance with methods described in the Waste Management procedure SGN/PM/SHE/50;

(d) Only use the hazardous substance if exposure to environmental pathways and receptors can be adequately controlled.

(e) Store/dispose of hazardous waste correctly and keep relevant transfer notes and a record in the hazardous waste logbook, where applicable.

1.2 Line managers must ensure that any activity involving the handling of hazardous substances, including application, storage and disposal, is subject to a site-specific risk assessment to minimise the risk to the environment from cross-contamination or spillage.

The risk assessment should consider the source-pathway-receptor approach and take into account:

- Storage and containment measures;
- The nature of the hazardous substance i.e. oil, solvent, herbicide, paint, etc.
- The location of the hazardous substance with regard to egress from site via drains, watercourses, surface runoff or via wind;
- Vulnerable receptors which may be impacted by a spillage e.g. neighbouring property, the public, flora and fauna, nearby environmentally important sites, watercourses, aquifers, etc.;
- The provision of spill kits and other mitigation methods; and
- The security of the site or location and protection from vandalism and theft.

1.3 Line managers must ensure that those using hazardous substances comply with the following:

- Only substances approved by the business are used on our sites, either by obtaining them through our approved Procurement processes or by contacting an appropriate body (e.g. BASIS) for advice on approved hazardous substances (see section 3.1 and SGN/PM/SHE/72 - Selection and Use of Herbicides on SGN Sites);

- Hazardous substances are used only when alternatives are not practical e.g. cutting and strimming in preference to using herbicides, etc.;
- All risks to health and safety are assessed prior to work commencing and appropriate measures are put in place to eliminate or control the risks;
- Operatives using hazardous substances are demonstrably competent to do so (including contractors); and
- All documentation is complete and available, including relevant Safe Control of Operations (SCO) permitry, COSHH assessments, risk assessments and method statements.

2. Storage

2.1 For further guidance on storage requirements refer to SGN/SP/SHE/71 - Installation of Tanks & Containment and the Safe Environment handbook.

The site nominated manager must ensure that:

- Storage and containment facilities are not sited where there is a risk of spillages entering drains or watercourses,
- All bulk liquid storage facilities are constructed to the recognised civil and engineering standards in respect of tanks and containment specifications, and comply with the requirements of the Oil Storage regulations in Scotland or England.
- Smaller volumes of liquids are stored on drip trays or within sealed bunds;
- Hazardous substance storage areas are secure and protected from vandalism and theft.

3. Records and documentation

3.1 The site manager must ensure that an inventory of all hazardous substances stored or used on site, together with the appropriate information on the associated hazards, is available (including during emergency situations). The inventory should include a list of all approved hazardous substances and detail the following:

- the typical quantity of material stored on site and its location;
- ICE sheets (available in the Safe Person handbook);
- Control of Substances Hazardous to Health (COSHH) assessments;
- Material Safety Data Sheets (MSDS);
- method statements for the use of hazardous substances;

- records of substances and amounts used on site, or waste transferred (to be retained for 3 years); and
- any additional information relating to a specific hazardous substance.

3.2 Information must be retained on site detailing substance and/or site specific risk assessments (see section 1), emergency response plans (see SGN/PM/SHE/65 – Environmental Risk Management) and the Safe Environment Handbook.

Emergency response plans (ERP) must detail measures in place to deal with a potential spillage, as well as the storage and disposal of any spilled hazardous waste materials, and be tested periodically. The recommended test frequency is annually.

The site manager must ensure current emergency contact information is retained on site and major spillages are reported to the Head of Environment & Support Services, in addition to the SEARS hotline as a moderate or significant environmental incident, so that remedial measures can be discussed with regulatory bodies if necessary.

The site manager must ensure site drainage plans include all storage areas of hazardous substances including fuel storage facilities and hazardous/special waste. Adequate spill kits must be available and strategically located in potential risk areas (and included on the site drainage plan).

4. Transport and disposal

4.1 Line managers should ensure drivers carrying hazardous substances retain a copy of the Safety handbook on their vehicle and must ensure that hazardous or dangerous substances are stored correctly and secure.

All drivers must carry information about hazardous substances in their vehicle, including the relevant ICE sheets. This should include written information stating the identity of the substance, the nature of the hazards and the actions to be taken in an emergency. For loads over a certain quantity a Transport Emergency Card (TREMCARD) must be carried. Further guidance can be found in the Drivers' Handbook.

4.2 Hazardous substances must be stored in vehicles in order to ensure that:

- they cannot move in transit (i.e. strapped in position, in secure fixed shelving, tool chests, etc.);
- they cannot be struck by other loose objects;
- they are not in the vehicle cab areas, if in a van;
- they are secured in the boot area, if in a car; and
- packages / containers are fit for purpose and are stored the correct way up to prevent spillage.

Hazardous substances no longer intended for use or beyond their use-by date should be returned to the supplier, normally via our central logistics stores, wherever possible.

Hazardous substances that cannot be returned to the supplier, or materials contaminated by a hazardous substances (e.g. when cleaning up a spill) must be stored and disposed of in accordance with SGN/PM/SHE/50 - Waste Management procedure, and the guidance contained in the Safe Environment Handbook.

In some circumstances hazardous substances such as anaerobic fluids and empty aerosol containers may be neutralized so that they can be disposed of as recyclable materials. For more information please refer to SGN/PM/SHE/50 or contact your local Environment & Support Services representative.

APPENDIX A - REFERENCES

This Management Procedure makes reference to the documents listed below

A.1 Internal Documents

SGN/MS/2	-	Environmental Standard
SGN/PM/SHE/50	-	Waste Management
SGN/PM/SHE/65	-	Environmental Risk Management
SGN/PM/SHE/72	-	Selection and Use of Herbicides on SGN Sites
Environment Handbook		Available on SGNnet> Departments> SHE> Environment > Environment Handbook
Safety Handbook- Raising the Standard		
Drivers Handbook		

A.2 External Documents

PPG 2	-	Pollution Prevention Guidelines: Above Ground Oil Storage Tanks
PPG 26	-	Pollution Prevention Guidelines: Drums and Intermediate Bulk Containers

APPENDIX B - DEFINITIONS

The definitions applying to this Management Procedure are given below

Hazardous substance	-	A hazardous substance is deemed to be any material, solid or liquid, that has the potential to cause harm to the environment, either as a consequence of its chemical or physical properties or as a result of the volume that may be handled. For further information refer to the Safe Person Hazard Sheets and ICE sheets contained in the Safe Person Handbook.

APPROVAL

This Management Procedure was approved by Terry Carroll on 06/06/2017 for use by managers, engineers and supervisors throughout Scotia Gas Networks (SGN).

SGN documents are revised, when necessary, by the issue of new editions. Users should ensure that they are in possession of the latest edition by referring to the SHE & Engineering Document Library available on SGNnet.

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BRIEF HISTORY

First published as T/PM/SHE/53	September 2004	
Revised and reissued as SGN/PM/SHE/53	September 2013	DESC-1316-14062013
Revised, rebranded and reissued	June 2017	DESC-1783-21102016

KEY CHANGES

Section	Amendments
Section 1	Additional statements in Section 1.1 regarding disposal and in section 1.3 regarding competency.
Section 3	Section 3.1 Additional line regarding waste transfer notes. Section 3.2 additional requirement for drainage plans.
Section 4	Section 4.1 Additional information regarding hazardous substances information.
Appendix	References update.

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Appendix 3 – Management Procedure for Waste

SGN/PM/SHE/50

Safety Management Framework

Management Procedure for Waste

June 2023

Management Procedure for Waste SGN/PM/SHE/50

Document Owner: Carolina Karlstrom Issue Date: June 2023

Context

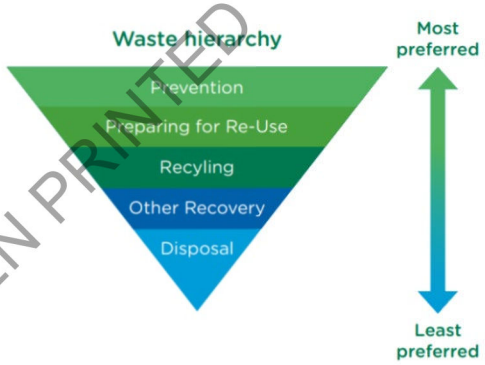
Who is this Management procedure for?

This management procedure applies to all employees.

What does this Management procedure do?

This procedure describes the processes required to:

- meet or exceed all statutory or regulatory requirements
- effectively manage all waste to prevent pollution
- ensure continuous improvement in our environmental performance and
- deliver waste reduction targets in line with our environmental strategy.



Scope

This management procedure applies to all our operations and activities.

Why do we need this Management procedure?

All staff need to follow the contents of this management procedure to ensure we:

- Comply with all relevant waste legislation
- Maintain our Environmental Management System (EMS) in line with our ISO14001 requirements
- Minimise the environmental impacts of our activities
- Realise the benefits of efficient and effective waste management.
- We have a requirement to report internally and externally on waste data, both weight and related carbon. This includes disclosure to OFGEM and other external stakeholders
- We have waste reduction targets as part of our Environmental Action Plan, this includes reducing waste to landfill, increasing reuse and aiming for circular economy.

This procedure forms part of our Environmental Management System (EMS) which is necessary to achieve our Environmental targets and the following requirements:

- All waste must be identified and segregated to maximise the potential for re-use and repurposing in line with Circular Economy principles

- If waste cannot be reused or repurposed it must be disposed of according to the waste hierarchy, prioritising recycling over energy from waste plants. Landfill is the least preferred option and should only be used when no other options are available. We have set a zero waste to landfill target.
- Metals and other potentially valuable waste materials are to remain the property of SGN and should be returned to our sites so that we may derive any potential intrinsic value.
- Waste materials must be stored securely on site to prevent loss or other interference.
- Storage of waste on sites must comply with one of the following options (see Section 4):
  - Exemption – Non-registerable
  - Exemption – Registerable
  - Waste Management Permit or Licence
- All waste disposal contractors carrying waste must be authorised to do so and all sites that receive the waste must be authorised to do so.
- Waste disposal routes must be subject to periodic audit to confirm that waste is being disposed of correctly, either by the Environment team for framework waste contractors or by the site responsible person for site specific waste carriers.
- All waste transfers must be accompanied by the relevant waste transfer note that adequately describes the waste.
- All statutory waste transfer documentation must be retained for the prescribed periods and be readily accessible.
- Quantities of waste generated must be recorded and monitored as part of our process for monitoring environmental performance.
- If fly tipped materials are discovered on one of our sites it must be reported through Velocity. Depending on the waste location and site boundary the waste will need to be removed by the Local Authority or an authorised waste management contractor arranged by SGN. The relevant Environment regulator should be notified of the incident where appropriate.
- If waste is generated within a residential home or garden as a result of a business activity it is defined as commercial waste and must be returned to the office or depot for disposal.
- All employees and contractors involved with the handling and management of waste must have the relevant training and be competent to do so.
- Waste elimination, reduction measures and circular economy measures must be implemented when possible and economically viable.
- We have a legal requirement to manage our waste responsibly and legally in line with the general waste duty of care requirements in the 1990 Environmental Protection Act. This also has related legislation on special and hazardous waste for example.

Contents

SGN Requirements

1. WASTE CARRIERS LICENCE

Waste carriers transport commercial, industrial and household waste, known as controlled waste, as part of their business. Waste brokers arrange for other businesses' controlled waste to be handled, transported, disposed of or recovered. Waste dealers use an agent to buy waste from other businesses to sell on. SGN is a waste carrier, so requires a waste carriers licence from the Environmental regulator to operate, this needs to be renewed on a 3 yearly basis. A licence issued from the Environment Agency or SEPA will cover all waste operations in Great Britain (England, Scotland and Wales) but a separate waste carriers licence will be required for Northern Ireland and will be issued by NIEA (Northern Ireland Environment Agency).

2. WASTE SEGREGATION & BACK LOADING

All waste must be identified and segregated to maximise the potential for re-use and recycling, to avoid landfill and to enable its proper disposal. Wherever possible, non-hazardous/special wastes should be back loaded to our stores at Thatcham and Eurocentral, via material delivery vehicles.

The Site Nominated Manager is responsible for the following:

Ref.	Requirements
2.1	**Back loading non-hazardous/special waste –** Waste should be stored in magnums (or metal stillages) for back loading to Thatcham or Eurocentral in preference to any other form of waste disposal method, if achievable. **Segregation of waste** - Waste stored at our sites must be pre-treated and segregated by type. The recommended waste streams are listed below. **Appendix E** lists the types of appropriate containers that should be available at a typical depot or office site. To enable waste to be effectively segregated and securely stored there should be enough waste containers and they should be clearly labelled with their contents. The storage units and waste streams located on any site will depend on the waste produced locally. Waste should be segregated (as a minimum) into the following categories: - Hazardous/Special solid waste - Hazardous/Special liquid waste - Metal - Meters (segregated by type) - PE pipe and fittings - Paper/cardboard - Soft Plastics - Hard Plastics - Wood - WEEE (Non-hazardous) - WEEE (Hazardous) - Batteries (Lithium[1], Alkaline/Zinc Chloride[2]) - Office waste (may include paper, cardboard and plastic cups – separately bagged)

[1] Lithium batteries must have their terminals taped and be stored in dry conditions.
[2] Hazardous batteries such as zinc cadmium or lead acid batteries must be segregated from each other and other battery types.

	- Non-recyclable waste - Reinstatement waste **Hazardous/Special waste** must be minimised whenever possible, e.g. through choosing selected products which do not generate Hazardous/Special waste. Hazardous/special waste must not be mixed with non-hazardous waste. Cross contamination of hazardous waste must not occur, this waste must be segregated and stored within individual approved drums or lockable waste safes. Hazardous/Special waste should not be stored longer than 3 months. If a **miscellaneous Hazardous/Special waste** container is used to store different hazardous/special waste types: • they must be separately bagged and labelled in clear bags. • bagging is also required if a single type of liquid hazardous/special waste is stored in its own approved drum but could contaminate the container. • a hazardous waste logbook must be kept and updated (see **Appendix I** for the logbook) and **Appendices D & K –** contain guidance on minimising hazardous/special waste generation and neutralisation of anaerobic sealant waste where the contents of containers cannot be completely used. Further segregation (e.g. into sub-categories such as aerosols, filters/filter dust, part used anaerobic containers, etc.) should be made to maximise re-use and recycling opportunities and ensure proper disposal, wherever practical.
2.2	**Aerosols** - must be segregated, placed in a drum containing a pressure relief valve or in a waste safe and stored in a well-ventilated area. Aerosol neutralising may only occur with full training and approved Aerosol puncture kit. Refer to **Appendix L** for further instructions.
2.3	**Waste Electrical and Electronic Equipment (WEEE)** - Non-hazardous WEEE should be recycled via the back-loading magnum process or our main waste contractor (Biffa). The original suppliers of WEEE may also provide a return process at zero cost, if this is an option this is the preferred route. Refer to **Appendix G** for further information on WEEE. Hazardous WEEE must be dealt with as hazardous waste and be disposed of as per Section 1.1).
2.4	**'NORM' dust/contaminated filters**[3] - waste dust and filters must be disposed of as hazardous/special waste. The waste should be referred to as mains or pipeline dust and use the EWC listed in **Appendix F** - SGN Waste Catalogue. Some waste carriers may require further sampling to be done before collection to prove if NORM (Naturally Occurring Radioactive Material) is present or not, please contact your environment manager for advice if you need this waste stream collected.
2.5	**Out of date materials** - should be avoided using effective stock control methods. Where these materials are found they must not be treated as waste. Items supplied by the central logistics warehouse should be clearly marked as 'out of date materials for return to supplier' and returned to the logistics centre. They will be returned to their original source for re-use options to be assessed. Materials supplied directly should be returned to the supplier, by prior agreement.
2.6	**Batteries –** Must always be returned or recycled as below. **Non-hazardous batteries** - should be back-loaded to one of our logistics centres in battery boxes, where they will be recycled in bulk. On sites where back loading is not present, batteries should be transported to a back-loading site or returned using the Batteryback recycling service. 

[3] SGN's "NORM" dust has been sampled at various locations throughout SGN over a 2-year period. The results of the analysis have proved that the dust we collect is significantly below the threshold to require classification and treatment as 'NORM'.

	Hazardous batteries – All lithium batteries need to have their terminals insulated and full disposal should follow the Logistics 'Storage of Used Lithium Batteries' procedure as shown in Appendix M Other hazardous batteries, such as lead acid or cadmium, must not be backloaded to the logistics centre. Recycling must be arranged by contacting Battery Back or Biffa.
2.7	**Sharps –** syringes and other related items requiring disposal should be stored within a sharps container. If they have been created as part of occupational health activities on our sites, then special waste will have already been arranged. Any sharps located elsewhere should be taken to a suitable local depository found in a hospital or surgery if possible. If sharps cannot be disposed of in this manner contact your local SHE manager for further guidance. 
2.8	**Asbestos waste** – small quantities of asbestos waste, including gaskets, pipe and contaminated PPE should be double bagged with a red inner and clear outer, and using the asbestos label shown here which highlighting that asbestos is present. It may then be dealt with as per other types of hazardous/special waste (including recording in the hazardous waste logbook and informing the waste contractor that asbestos waste is present).   Larger quantities of asbestos containing material, must not be removed from their original location and must be managed and disposed of by specialist asbestos contractors. Contact your local SHE manager for advice before dealing with any asbestos waste (refer to SGN/SHE/PM/29 Management Procedure for Protection of Health from Asbestos). Additional information concerning asbestos can be found under the asbestos safety pages of the Digital Hub.
2.9	**Spoil –** The creation of reinstatement waste should always be minimised: • Spoil should be segregated and covered to protect it from the weather and from run off into nearby drains or watercourses. • Suitable/selected excavated material (SEM) should be used as backfill wherever practical to do so, if this is not possible recycled material must be prioritised over virgin aggregate • Spoil that cannot be used for backfill should be taken to recycle centres for reprocessing, avoiding landfill where possible.
2.10	**Mains/siphon water waste –** guidance on the handling and storage of waste water is contained within SGN/PM/SHE/52. Storage limits in our depots of mains siphon water are contained in **Appendix C**. Collection and disposal of the water must be arranged with a specialist waste contractor e.g. Biffa. The waste can be collected direct from the work site or from a designated depot.
2.11	**Food waste –**cannot be back loaded to our central logistics centres. Food waste bins and collections should be in place for occupied sites. If you have additional requirements, please contact the Environment team to discuss. A waste management permit/licence exemption will be required if a composter is to be used to recycle food waste on site.
2.12	**Non-standard waste –** if a non-standard item (not detailed specifically elsewhere in this procedure) is identified, contact your local SHE Manager for advice on the most suitable method of disposal.
2.13	**Site Waste Management Plans (SWMP)** – It is best practice to produce a SWMP at the design phase of construction projects where the value exceeds £300,000 or if the business believes that an SWMP will be of added value. Our SWMP guidance is contained within **Appendix H**.

3. METALS AND OTHER POTENTIALLY VALUABLE WASTE MATERIALS

Ref.	Requirements	Responsible Person
3.1	**Metals and other waste of high value –** Metals and other potentially valuable waste materials are to remain the property of SGN and should be returned to our sites, so that we may derive any potential intrinsic value. Where metals are recycled via our waste contractor, they will let us know the value and we will invoice them for the rebate. SGN's Billing team will manage the raising of issue.	Waste Producer (SGN employees and contractors)

4. WASTE STORAGE SECURITY

Waste materials must be stored securely on site to prevent loss or other interference.

Examples of fit for purpose storage units for various waste streams are contained within Appendix E.

Ref.	Requirements	Responsible Person
4.1	**Waste Containers** – must be fit for purpose, sited in a suitable location on an impermeable base, secure, covered and correctly labelled with the waste stream. If there is limited undercover storage or container lids then the waste streams that must be prioritised for cover are batteries, WEEE waste and meter returns, cardboard and paper should also be covered where possible.	Site Nominated Manager or Team Manager
4.2	**Hazardous/Special waste storage-** these containers must be locked and signed, either in a lockable waste safe or in locked container. Any waste in the container must be recorded in the hazardous waste logbook and marked off once collected.	Site Nominated Manager or Team Manager

5. WASTE STORAGE LIMITATIONS

Storage of waste on sites must comply with one of the following options:

- **Exemption – Non-registerable -** Waste stored falls and complies with the requirements for one or more of the activities specified as exempt from Environmental Permitting (England), Waste Licensing (Scotland) regulations or Waste Regulations (Northern Ireland).

- **Exemption – Registerable -** Waste Management Permit and Licence exemptions may be obtained for specific waste categories by registering them with the Environment Agency (EA), Scottish Environmental Protection Agency (SEPA) or Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA NI).

- **Waste Management Permit or Licence -** Should a need arise to store waste of a type and/or volume that is not allowable by either of the above exemption processes, a waste management permit in England (from the EA) or waste management licence in Scotland (from SEPA) or Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA NI will be required

The Site Nominated Manager is responsible for:

Ref.	Requirements
5.1	**Exemption – Non-registerable** - Waste stored falls and complies with the requirements for one or more of the activities specified as exempt from Environmental Permitting (England), Waste Licensing (Scotland) regulations or Waste Regulations (Northern Ireland). The restrictions applicable under these exemptions (for which we are not required to register) are detailed within **Appendix C**. If intending to store volumes of waste materials which exceed the limits or types allowed, as described within Appendix C, a registerable exemption or waste management permit/licence may be required. Under these circumstances contact your local SHE Manager for further guidance.

6. WASTE CONTRACTORS' AUTHORISATIONS

All waste disposal contractors carrying waste must be authorised to do so and all sites that receive the waste must be authorised to do so.

The Environment manager/ Site nominated manager is responsible for:

Ref.	Requirements
6.1	**Waste company documentation** –The key Waste Carrier Licences (WCL) including SGN and our framework waste suppliers can be found in the Environment section of Digital Hub. WCL's for site specific contractors that are not on Digital Hub should be obtained directly by the site responsible managers and be stored on site or on the sites Environment folder on Teams.
6.2	Periodic audits of our main waste management contractors should be undertaken to ensure they are complying with UK legislation.

7. DUTY OF CARE CHECKS

Waste disposal routes must be subject to periodic audit, to confirm that waste is being disposed of correctly.

Ref.	Requirements	Responsible Person
7.1	Relevant reinstatement managers are required to undertake **Duty of Care compliance checks** on their contractors on an **annual** basis as a **minimum**.	Reinstatement managers
7.2	**Duty of Care** checks must be completed in accordance with the template and guidance contained within **Appendix I** and available to download on Digital Hub. Checks should be planned based on risk, but as a minimum, must cover one waste stream per site/depot per annum or in the case of reinstatement 2 checks per contractor per annum.	Site Responsible, Construction Performance, Senior Reinstatement Manager
7.3	An **adhoc check of activity** should be carried out where additional assurances are required to confirm that Duty of Care requirements are being met. Only in exceptional circumstances cases, it may be necessary to follow a waste collection vehicle to confirm where waste is being taken to.	
7.4	A duty of care **verification check** should be carried out as soon as possible where there has been a change to the carrier, or a new waste carrier has been introduced. This is in addition to the planned annual inspections as described in 6.2	
7.5	**New waste service providers/spoil removers** should be made known to the Environment & Sustainability Team in order that their database may be kept up to date.	

7.6	**Retention of completed Duty of Care documents** – these should be stored in the site folder or Teams channel for 3 years.	

8. WASTE TRANSFER DOCUMENTATION

All waste transfers must be accompanied by the relevant statutory documentation that adequately describes the waste.

Ref.	Requirements	Responsible Person
8.1a 8.1b	**Controlled Waste Transfer Note (CWTN) –** each transfer of non-hazardous waste must be accompanied by a CWTN. The relevant six-figure European waste code (EWC) must be included on the transfer note. Each transfer note must include the SIC (Standard Industrial Classification) code and be signed by both parties. For SGN our SIC code is 35.22 which denotes '35.22 Distribution of gaseous fuels through mains'. Refer to **Appendix F** (SGN Waste Catalogue) for a list of our main waste types and relevant EWCs and **Appendix J** for an example waste transfer note. If the same type of waste is to be transferred from the same site to the same disposal site by the same carrier, an Annual Waste Transfer Note (AWTN) can be used to cover all loads over a twelve-month period. This must be supported by further documentation that shows collection times and quantities and it must be signed by SGN and the supplier. Some waste movements by SGN, such as carrying reinstatement material to a recycle centre, may require a waste transfer note. Waste transfer notes must contain all the information described above. See example in **Appendix J**. You can contact the Environment team for more information on notes for SGN waste movements. Waste note booklets can be ordered from SSE Print Centre using the order form available on Digital Hub. Further details can be provided by the Environment team.	Site Nominated Manager
8.2	**Back Loading** - where waste is being back loaded, the annual WTNs will be held on the Environment section of Digital Hub and updated annually. A delivery schedule will be held for each site.	Environment Manager
8.3	**Hazardous/Special Waste** - Where waste is deemed to be hazardous each transfer must be accompanied by a Hazardous/Special Waste Consignment Note (HWCN). The relevant six-figure European Waste Code (EWC) must be included on the consignment note (hazardous wastes are indicated by an asterisk (*) in the six-figure European Waste Code). In Scotland & Northern Ireland a minimum of three working days pre-notification to SEPA/NIEA is required prior to any movement of special waste. The SGN Waste Catalogue (**Appendix F**) identifies our main types of waste and their corresponding EWCs.	Site Nominated Manager
8.4	**Changes to waste streams** must be agreed with Environment before implementation to ensure that: • our waste minimisation and maximising of segregation strategies and targets can be achieved; and • the correct waste descriptions and the relevant six figure EWCs are used.	Site Nominated Manager

9. WASTE DOCUMENT RETENTION

All statutory waste transfer documentation must be retained for the prescribed period and be readily accessible.

Ref.	Requirements	Responsible Person
9.1	**Retention of documents -** Controlled Waste Transfer Notes (CWTNs) must be retained for two years after expiry of the note and must be available for inspection on request. Hazardous Waste Consignment Notes (HWCNs) for hazardous/special waste transfers must be retained for three years and must be available for inspection, on request.	Site Nominated Manager
9.2	**Hazardous Waste Regulations 2005 – Producer Records** The producer of the hazardous waste shall keep a record of the quantity, nature, origin and, where relevant, the destination, frequency of collection, mode of transport and treatment method of the waste. Records must be kept for 3 years minimum. This should be kept in the hazardous waste logbook on site.	Site Nominated Manager
9.3	**Hazardous waste consignment: Part E** When hazardous waste is consigned with a registered carrier you must get a copy of the Part E of the consignment note back from the final destination to confirm they have received the waste. When using SGN's framework waste supplier for collection of the hazardous waste, the part E notes will be sent to the Environment team directly. If you are using a different supplier to pick up the hazardous waste, you need to request from the supplier directly and store a copy of the note on site.	Site Nominated Manager

10. WASTE DATA MONITORING

Quantities of waste generated must be recorded and monitored as part of monitoring environmental performance.

Ref.	Requirements	Responsible Person
10.1	**Waste data** (reused, recycled, energy from waste, landfill, etc.) must be collected from our waste management service providers and central logistics hubs and used for environmental reporting on a monthly basis. Carbon data from vehicle transport may also be requested to feed into our wider indirect carbon emissions reporting.	Environment team
10.2	Waste exemptions- site waste exemptions may be required from SEPA/EA/NIEA if you store a certain amount of waste or carry out certain waste activities on site. These must be reviewed periodically and kept up to date. See Appendix N- Simple waste exemptions.	Site nominated manager

11. FLY TIPPED WASTE

It is the responsibility of the landowner/occupier to organise safe and legal disposal of fly-tipped waste. If fly tipped materials are discovered on one of our sites it must be reported to Velocity and an appropriately authorised waste management contractor should deal with its disposal. If the waste is on Local Authority land adjacent to our site, the council should arrange the waste collection. The relevant regulator should be notified of the incident where appropriate, see guidance below.

The Site Nominated Manager or Team Manager is responsible for:

Ref.	Requirements
11.1	**Fly tipped waste on SGN sites** - is usually easily identified (e.g. general household rubbish, aggregates etc.) as non-hazardous waste and arrangements should therefore be made to remove it using our waste management contractors. Fly tipped waste deposited in street works should be treated in the same way as any other fly tipped waste. Fly tipped waste should be barriered off and all site personnel made aware of its location. Unidentified material could be hazardous (e.g. asbestos) and must only be moved once the type of waste has been determined. If found to be hazardous, this should only be handled by competent waste management contractors. Tyres and WEEE also need to be dealt with as hazardous waste. **Reporting (SGN sites) –** an environmental incident should be raised in Velocity including date, the waste type, quantity and how the waste was dealt with, if known.
11.2	**Fly tipped waste on public land or land owned by 3rd parties** – the relevant Local Authority must be contacted to deal with fly tipped material discovered on public land, including street works and the landowner/occupier for private land/property. **Reporting (public and 3rd party sites) –** relevant information should be provided to the Local Authority, EA, SEPA or NIEA to assist them with their investigation.

12. HOME WORKING WASTE

Confidential or classified waste generated from work activities at home must be returned to a company site for disposal. This includes confidential waste paper, batteries and toner cartridges as improper disposal could lead to fines or prosecution.

Ref.	Requirements	Responsible Person
12.1	**Home working** - SGN work waste generated from home working activities e.g. confidential waste paper, batteries, toner cartridges, etc, must be returned to an SGN site to ensure its legal disposal.	Line Manager

13. TRAINING AND COMPETENCY

All employees and contractors involved with the handling and management of waste must have the relevant training and be competent to do so.

Ref.	Requirements	Responsible Person
13.1	**Competence** - Managers must ensure that all employees involved with waste management are competent to undertake the activity by receiving appropriate training. If additional training is required, please contact the Environment team.	Line Manager
13.2	**Training requirements** – training provided must satisfy the requirements of ISO14001 and will include Environment Awareness and other environmental E learning modules accessible through People Portal. Additional training will be available through Supply Chain Sustainability School for all staff and contractors that register to use the resources.	Head/Manager of Department

APPENDIX A – REFERENCES

A.1 INTERNAL REFERENCES

This Management Procedure refers to the documents listed below:

SGN Procedure Reference	Description
SGN/PM/SHE/52	Management of Waste Water
SGN/PM/SHE/29	Management Procedure for Protection of Health from Asbestos

A.2 EXTERNAL REFERENCES

EU Waste Framework Directive

Waste (England and Wales) Regulations 2011

Waste (Scotland) Regulations 2012

Waste regulations (Northern Ireland) 2019

Waste Electrical and Electronic Equipment (WEEE) Regulations 2013

The Special Waste Amendment (Scotland) Regulations 2004

The Hazardous Waste (England and Wales) Regulations 2005

APPENDIX B – DEFINITIONS

The definitions applying to this Management Procedure are as follows:

Term	Description
Waste	Any substance or object that the holder discards, intends to discard or is required to discard. (European Waste Framework Directive)
Back loading	A waste management process designed to maximise recycling and reduce our carbon footprint. Material delivery vehicles, rather than returning largely empty to our central logistics stores, collect our waste stored in magnums and battery boxes and take it back to stores for further segregation and bulk recycling.
Circular Economy	Circular economy is a model of production and consumption, which involves reusing, repairing, refurbishing and recycling existing materials and products as long as possible. Instead of a linear way of using materials e.g., buy, use, dispose we are now looking to close the loop and reuse or repurpose materials as much as possible.

Term	Description
CWTN	Controlled Waste Transfer Note – documents (containing a valid EWC and SIC code) that should always accompany the removal of non-hazardous waste from our sites. Annual CWTNs are prepared for back loading waste.
EWC	6-digit European waste code (derived from EWC catalogue) which identifies the specific type of waste being removed from site. EWCs also specify if an item should be classified as hazardous/special waste.
HWCN or SWCN	Hazardous Waste Consignment Note -HWCN (Special Waste Consignment Note in Scotland) must accompany the removal of all hazardous or special wastes from sites. We must retain one part of the multipart document.
Hazardous/special waste	These types of waste are harmful to human health and/or the environment, either immediately or over an extended period. Wastes will fall into one of three categories, those that are: **Always hazardous** e.g. lead acid batteries or fluorescent tubes, **Never hazardous** e.g. edible oil; or **May, or may not, be hazardous and need to be assessed** e.g. ink or paint. Hazardous (England & Wales) or Special waste (Scotland) is identified in the European Waste Catalogue by means of an asterisk against its 6-digit numeric code.
NORM	Naturally Occurring Radioactive Material. NORM may be produced as a result of pigging or filter replacement processes.
Sharps	Used syringes and needles etc.
SIC Code	Standard Industrial Classification code
Waste	Waste is defined as any substance or object the holder discards, intends to discard or is required to discard. (European Waste Framework Directive).
WEEE	Waste electrical and electronic equipment – see WEEE guidance
E.A.	Environment Agency
S.E.P.A.	Scottish Environment Protection Agency
N.I.E.A.	Northern Ireland Environment Agency

APPENDIX C - Non-Registerable Waste Permit and Licence Exemptions

Storage Limitations and Conditions

Description of Waste	Total Storage Limit on Site	Conditions	Location to which limits apply
Total mains water liquid wastes (hazardous and non-hazardous inc. vehicle tankers) **Other liquid waste (hazardous and non-hazardous)**	17,000 litres *1000 litres	Liquids must have secondary containment – maximum storage time 3 months (for full details see Regulatory Position Statement on Digital Hub or *NWFD2)	**Southern Gas Networks**
Total solid waste (hazardous and non-hazardous including WEEE)	50 Cu. Metres	This exemption allows the temporary storage of any waste (other than unbonded asbestos and any substances that have a flash point of less than 21°C), pending its collection, at a place controlled by the waste producer. Maximum storage time - 3 months	
Ancillary treatments allowed on site	• Compaction of paper and cardboard to increase the amount of waste that can be stored within a container; • Shredding confidential papers for security purposes; • Crushing or compacting large items to allow easier loading; • Separating recyclables such as paper, card, plastic and glass from mixed wastes into separate storage containers.		
Total liquid wastes (special and non-special)	23,000 litres at site with a non-registerable exemption	Secure storage of non-liquid waste other than at the place of production, for max. 3 months	**Scotland Gas Networks**
Total solid waste (special and non-special)	**50 Cu. Metres at all sites or 80 Cu. Metres if stored in secure containers**		

APPENDIX D - Hazardous/Special Waste Reduction Guidance

Product	European Waste Code applicable to part used hazardous containers	Manufacturers guidance to avoid creating hazardous waste	If part used containers are unavoidable conduct the following:
Bar Seal (ALH)	08 04 09*	Part used cartridges should not be left. Material can be stored and re-used with a new nozzle or remnants can be transferred into a tin where they can be cured. Cured material can be placed in the non-recyclable waste magnum.	When hazardous waste is stored in a mixed hazardous or special grey waste safe ensure waste is contained within a single CLEAR plastic bag – contents must be clearly identified on outside of the bag. Complete the hazardous/special waste log
Annerseal (Chemence)	15 01 10*	Part used cartridges should not be left. Material can be pumped out into the bags provided and allowed to cure. Nozzle contents should cure so the cured materials/nozzles can be placed in the non-recyclable waste magnum.	
Anaerobics - all colours (Chemence)	08 04 09*	Part used cartridges should not be left - material should be fully pumped into main. If cured this material should be stored within the non-recyclable waste magnum. Where part used anaerobic containers cannot be avoided the **Anaerobic Sealant Neutralisation Process** (described within Appendix K of this procedure) should be followed.	
Mainseal 2 Lead Yarn and Mech. (ALH)	N/A	Part filled containers should not remain. Material should be fully used when effecting repairs.	As per spent cartridges.
Ecoseal 6 cartridges	N/A	Part filled containers should not remain. Material should be fully used when effecting repairs.	As per spent cartridges.
Polyform Sealant	08 04 09*	Remnants should be mixed together to make them inert. Activator should be exposed to air or water added to make this inert. Place items in "Non-Recyclable Waste" magnum	When hazardous waste is stored in a mixed hazardous or special grey waste safe ensure waste is contained within a single CLEAR plastic bag – contents MUST be clearly identified on outside of the bag. Complete the hazardous/special waste log.
Polyform PE repair kit and Riser Parts A & B	08 04 09*	Remnants should be mixed together to make them inert. Activator should be exposed to air or water added to make this inert. Place items in "Non-Recyclable Waste" magnum.	

Steve Vick Foam off bags, resins, grouts.	N/A	Any out of date stock or containers, please check if the supplier will take the waste back. If they will not take them back the materials should always be cured. The containers can then be treated as inert. Place items in "Non-Recyclable Waste" magnum.	These should not be any non-cured remains.
SVI Foambag 4"/6" Flow Stop Resin			
SVI Live Endseal Resin 63/75mm in 4"/6"			
SVI Insertion Sean No3/4 FK003/FK004 cured			
SVI Live End Seal Resin 90mm in 6"FK038 Cured			
SVI Live End Seal Resin 125mm in 6"FK039 Cured			
SVI Insertion Seal Resin			
SVI Grout Pack Kit 2ltr x 4 FK195/4			
Grout powder & Gauging liquid			
SVI Foam Pack Resin 200/400/600/800/ 1200ml FK369,370,371, 119, 109 Cured			
SVI Foambag 8", Flowstop Resin, Cured			
Encapsulants (PLCS/ALH)	Sealant Part A (Hard.) 080501* Sealant Part B (Base) 080409* Primer 080415*	Part filled containers should not remain. Mix any remnants together to cure. Cured material should be stored within the "Non-Recyclable Waste" magnum.	When hazardous waste is stored in a mixed hazardous or special grey waste safe ensure waste is contained within a single CLEAR plastic bag – contents MUST be clearly identified on outside of the bag. Complete the hazardous/special waste log.
MX1 Hardener 2/3" FK081	15 01 10*	Mix with water to create non-hazardous waste.	If not diluted with water store in hazardous waste container. Enter details on hazardous log.

- Spent cartridges (i.e. those with a very small amount of remnant inside the containers/nozzle) should be treated as non-hazardous and be placed in magnums that store non-recyclable waste (EWC is 15 01 10).

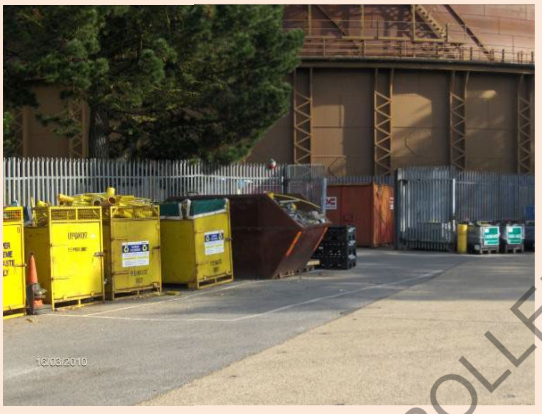
- Out of date full containers: Please contact the supplier asking them to take these back in line with Circular Economy principles to promote reuse and repurposing or more direct recycling.

APPENDIX E – Back Loading and Waste Containment

The following are examples, with capacities, of fit for purpose waste containers that should be used on our sites:

Back loading for 3 waste streams (individual magnum capacity is approximately 0.8 m^3).

Back loading magnums set up at a depot.



PE recyling containers (capacity approximately 6.5 m^3), metals skip and magnums.

As a last resort use a general waste front-end loader (FEL). This type of contractor supplied waste container may be located where backloading cannot take place (8 m^3).

Metal skips (volumes typically around 8 m^3 – 3 tonnes).

Scrap metal stored ideally in stillages (volumes typically 1 tonne).