



Beaully-Denny Replacement Transmission Line Project

Waste Management Plan

for the Section from Wharry Burn to Denny Substation

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1 INTRODUCTION

- 1.1.1 This Project Waste Management Plan is designed to provide guidance to the SPT Project Management Team and Contractors on the roles and responsibilities required for managing waste and raw material use during work carried out on the Wharry Burn to Denny Substation section of the Beaulieu Denny transmission line.
- 1.1.2 Management of waste and raw materials on site will be the responsibility of the relevant Contractors (listed in Table 1). There are also responsibilities and actions that will lie with SPT, to ensure compliance with relevant waste management legislation and best practice (see Appendix 2 – Indicative Legislation Register).
- 1.1.3 This Waste Management Plan applies to the following activities:
- Forestry operations (including welfare).
 - Public Road Improvements.
 - Section site compounds and satellite offices.
 - Borrow pit operation (including welfare).
 - Access track construction and removal.
 - 400kV overhead line construction.
 - 132kV line dismantling.
 - Restoration and re-instatement associated with the above.
- 1.1.4 The project Materials Management Plan builds on the requirements detailed in Section 5.2 'Identifying Waste', for those materials which may be classed as 'Not waste' and will therefore not be subject to the waste regime nor the requirements of this plan.

2 LEGISLATIVE BACKGROUND

- 2.1.1 The principal system of waste management operating throughout the UK is that provided by the *Environmental Protection Act 1990 (EPA)* which has replaced most of the earlier system provided by the *Control of Pollution Act 1974 (COPA)*. Both systems apply to 'controlled waste' which includes non-hazardous and hazardous waste.
- 2.1.2 The *EPA* introduced a 'Duty of Care' on all who produce, import, carry, keep, treat, or dispose of controlled waste. Other specific aspects of waste management such as waste transfer and waste carriage are covered by relevant Regulations issued under the two principal *Acts*. The control of litter is treated separately from other waste, principally by the *EPA (1990)* and associated Regulations. It is likely that Contractors will generate both non-hazardous 'general' waste as well as hazardous or 'special' waste during operations.
- 2.1.3 The main UK / Scottish legislation applicable to waste management for Beaulieu-Denny is listed below. Further information on the requirements of this legislation is included in Section 4 of Appendix 2.
- Environmental Protection Act 1990 (EPA).
 - The Environmental Protection (Duty of Care) Regulations 1991 (as amended).
 - Duty of Care Code of Practice.
 - Control of Pollution Act 1974 (as amended).

- The Controlled Waste Regulations 1992 (as amended).
- The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991.
- The Special Waste Regulations 1996.
- Special Waste Amendment (Scotland) Regulations 2004.
- Waste Management Licensing Regulations 1994 (as amended).
- Landfill (Scotland) Regulations 2003 (as amended).
- The Waste (Scotland) Regulations 2011.

3 ROLES AND RESPONSIBILITIES

3.1.1 The main roles and responsibilities for waste management are defined in Table 1 below.

Table 1: Waste Roles and Responsibilities

Title	Role
SPT Iberdrola Engineering and Construction (IEC)	<ul style="list-style-type: none"> • Consult with SEPA and other appropriate regulators to agree positions on legal interpretation, waste definitions and management of materials. • Review and agree the contractor's detailed Site Waste Management Plans. • Review test results of inert and hazardous waste and liaise with the contractors Environment Team on ways of disposal. • Audit the waste processes against agreed targets and legislation. • Review detailed waste documentation from Contractors.
Contractors (Preliminary Works, 132kV Line Enabling Works, 400kV Overhead Line (OHL), Distribution OHL Works, Cable – Denny North Substation, Wirescape rationalisation, Public Road improvements)	<ul style="list-style-type: none"> • Prior to construction detailed Site Waste Management Plans (SWMP's) will be produced by the Contractors and approved by the SPT and IEC Environmental Management Teams (see Section 5). These SWMP's will apply and implement the principles defined within this document for designated areas and activities. • Implement SWMP's on site and train staff on waste management issues. • Develop KPI's / targets for recycling and sustainable material use. • Develop actions plans as part of the SWMP's to achieve KPI's / targets. • Designate a waste champion(s) as part of their contracts, who are the responsible person in relation to waste issues. • Carry out waste audits to check compliance with applicable legislation and SWMP's. • Provide updates to SPT on KPI's, waste audits and corrective actions.

4 SITE WASTE MANAGEMENT PLANS (SWMP'S)

4.1.1 Site Waste Management Plans are a legal requirement in England and Wales since 2008 for projects over £300k in value. Although there is no legal requirement in Scotland currently, SPT and IEC are committed to implementing best practice on the

Beaulieu-Denny project and therefore require those Contractors listed in Table 1 to prepare SWMP's for relevant areas and activities (listed in Section 1.1.3).

4.1.2 In preparing SWMP's, Contractors should have regard to the requirements of this Project Waste Management Plan, the Site Waste Management Plans Regulations 2008 and relevant guidance (eg DEFRA's Non-statutory guidance for site waste management plans¹).

4.1.3 SWMP's should include as a minimum:

- Who will be responsible for materials management.
- What types of materials will be used on site.
- What types of waste will be generated.
- How these wastes will be managed – using the Waste Hierarchy and the best practice detailed in this Plan.
- Which waste contractors will be used to ensure the waste is correctly recycled or disposed of responsibly and legally, including copies of relevant licences and exemptions.
- How the quantity of waste generated by the project will be measured.

4.1.4 The Contractors are required to carry out audits to ensure compliance with SWMP's and the requirements of this plan at regular pre-determined intervals.

5 SITE WASTE MANAGEMENT REQUIREMENTS

The Contractors are required to comply with the following legal and best practice requirements for managing waste resulting from their activities.

5.1 MINIMISING WASTE

5.1.1 The following best practice should be incorporated into Contractors' procedures to reduce the amount of waste produced:

- Ensure building materials ordered are the correct size.
- Order the appropriate volume of materials.
- Return excess materials to the supplier if possible or advertise them to other projects within the Company.
- Avoid ordering new materials if there are existing materials available or able to be adapted to the task within the Company.

5.2 IDENTIFYING WASTE

5.2.1 Waste is defined in the Waste Framework Directive (WFD) as “any substance or object, (set out in Annex 1 of the WFD), that the holder discards, intends to discard or is required to discard.” This definition requires that materials considered waste, whether being sent to landfill, recycling or being reused on site under an exemption, are subject to the waste management control regime and legislation listed above.

¹ <http://www.defra.gov.uk/environment/waste/topics/construction/pdf/swmp-guidance.pdf>

- 5.2.2 The European Waste Catalogue (EWC) 2002² is intended to be a catalogue of all wastes, grouped according to generic industry, process or waste type. The characterisation will aid in identification of relevant legislation and management.
- 5.2.3 In the absence of intent or requirement to discard material generated on the project it may be considered that the material is 'Not Waste' and therefore it remains outside of the waste management control regime and outside of many requirements of the above legislation.
- 5.2.4 Appropriate characterisation of such materials, and in accordance with the requirements listed below, will enable SPT and the Contractors to identify which materials are likely to be classed as 'Not Waste'. These requirements are included in the SEPA publication "*Land Remediation and Waste Management Guidelines*" (Jan 2010)³ and are as follows:
- The use of the materials is a necessary part of the planned works.
 - The materials are suitable for the proposed end use.
 - The materials do not require any processing or treatment before on-site use in restoration.
 - No more than the quantity necessary will be used.
 - The use of the materials for the proposed end use is a certainty.
 - The end use of the materials will not result in pollution of the environment or harm to human health due to the proposed and proven suitability of the materials.
- 5.2.5 Special Waste can be identified initially using the EWC based on the hazardous properties of the materials or substances.
- 5.2.6 SEPA should be consulted for agreement that materials are classed as waste (either special or non-hazardous) or 'Not Waste' where the Contractor is unsure.
- 5.2.7 Table 2 below identifies likely waste materials to be generated from the project, and should be used as a guide only. Further guidance on identifying waste can be found in SEPA's Guidance publication "*Is it waste? – Understanding the definition of waste*" (WML-G-DEF-01)⁴.

² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000D0532:20020101:EN:PDF>

³ http://www.sepa.org.uk/waste/waste_regulation/guidance__position_statements.aspx

⁴ http://www.sepa.org.uk/waste/waste_regulation/guidance__position_statements.aspx

Table 2: Likely waste materials on the Wharry Burn – Denny Substation Project

Material	Site office compounds	Installation 400kV line	Removal of 132 kV line	Reinstatement (including access track removal)
Waste Oil*	X	X	X	X
Waste Fuel*	X	X	X	X
Waste Parts*	X	X	X	X
Containers with residue (oil, chemical, organic)*	X	X	X	X
Steel		X	X	
Aluminium conductor		x	x	
Concrete	X	X	X	X
Glass		X	X	
Ceramic		X	X	
Paper	X			
Plastics	X	X	X	
Aerosols*	X	X	X	
Chemicals*	X	X	X	
Steel/Aluminium cans	X			
Paint*	X			
General office refuse	X			
Vegetation and peat	X	X		X
Soil	X	X		X
Oil contaminated soil*	X	X	X	X
Waste water (sewerage)*	X			
Stone				x
Silt	x	x		x
Teram	x	x		x
Geogrid	x	x		x
Wood poles	x	x		
Cardboard	x			
Batteries*	x			
Timber (offcuts and packaging)	x	x		

* Likely to be classed as Special Waste

5.3 STORING WASTE

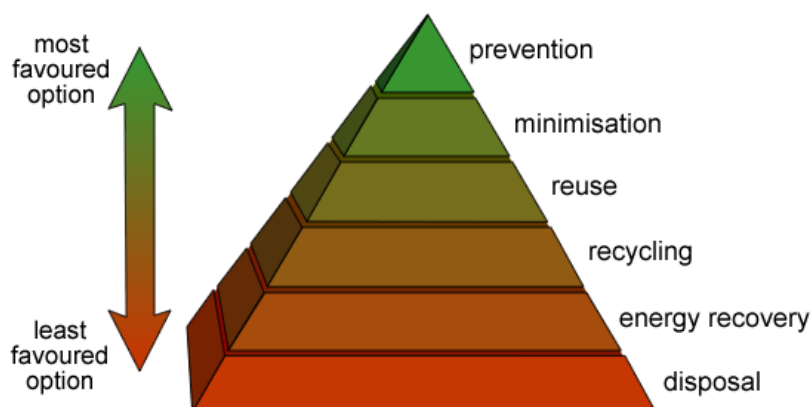
- 5.3.1 Waste should be stored at the place where it is generated or at designated central areas (for example at Section Site Compounds) in a secure manner which prevents it escaping into the environment.
- 5.3.2 Waste storage will be governed by two standard practices - containment to prevent a pollution incident and segregation of different waste types to facilitate maximum recycling
- 5.3.3 In order to achieve this Contractors are required to ensure:
- All containers are in good condition, contain no holes and are covered to prevent material blowing away and to prevent water ingress. Any water entering a skip may require to be treated if it mixes with hazardous waste.
 - All wastes that could leach or be entrained in water runoff should be stored on a bunded impervious area.
 - Storage of liquid wastes will require storage on impermeable surfaces that are within a secondary containment system, ideally a bund with 110% capacity of the container.
 - Different waste streams will be segregated to facilitate accurate description for transport of waste and disposal to landfill; reuse and recycling of various waste streams; and the use of appropriate pollution controls.
 - Segregation of waste at the point of generation will be provided by the use of designated areas or containers that are clearly labelled with bilingual and diagrammatic signs.
- 5.3.4 Dedicated, signed containers should be provided in order to segregate waste materials for recycling or recovery. The minimum requirement for skips where appropriate is:
- General mixed non-hazardous.
 - Wood.
 - Metal.
 - Hazardous (Special) – must be separate containers for each type of waste.
 - Plastics.
 - Inert.
- 5.3.5 Regular waste audits will be undertaken by the Contractors and SPT's Audit Team to check for the following:
- Containers are adequately signed.
 - Containers are being filled fully prior to uplift.
 - There is no cross contamination of materials (eg. hazardous and non-hazardous or wood and metal etc).
 - Canteen and hazardous wastes are contained in covered containers.
 - Containers are fit for purpose – i.e. adequately sized and structurally sound.
 - Waste documentation is being retained, e.g. Waste Transfer Note's.

5.3.6 **Burning of waste is strictly prohibited** unless permission is granted from the SPT Environmental Management Team. The burning of waste is subject to environmental legislation and will require approval from the Regulators.

5.4 IDENTIFYING RECYCLING AND DISPOSAL OPTIONS

5.4.1 The Waste Hierarchy (shown in Figure 1 below) sets out the preferred options (in order of environmental cost benefit) for managing waste on the project. Suitable options for waste materials should be identified based on the Hierarchy with disposal being the least desirable.

Figure 1 The Waste Hierarchy



5.5 CHARACTERISING WASTE FOR LANDFILL

5.5.1 For any wastes that are planned to be disposed of directly to landfill they must be characterised in accordance with Waste Acceptance Criteria (WAC). Each Landfill class has WAC set by the Landfill Regulations, which must be achieved by the waste in order for the landfill to accept it. The WAC criteria are listed in the Landfill (Scotland) Regulations 2003 (as amended), and relate to the landfill classification.

5.5.2 Characterisation is not required for wastes that are disposed of to a recycling facility, waste transfer station or waste management licensing “exempt” site.

5.6 TRANSFERRING WASTE

5.6.1 To prevent the illegal transport of waste by others the Contractors (and their sub-contractors) must comply with Duty of Care requirements (including Special Waste) set out in the Environmental Protection Act 1990 and supporting Regulations.

5.6.2 Waste carriers appointed by the Contractors will be required to supply the Contractor with the appropriate Duty of Care documentation necessary to transport waste legally. These details should be recorded in the relevant Site Waste Management Plan and will include:

- Validity of Waste Carrier’s Registration Certificate (Carrier’s Licence).
- Content of Waste Transfer Notes
- Identification of Disposal Site(s)

- 5.6.3 This information will be retained by the Contractors together with copies of relevant Waste Management Licences and Written Exemptions.
- 5.6.4 Periodic (approx 6 monthly) checks should be undertaken to ensure that waste contractors have valid Licences.
- 5.6.5 All waste leaving the site will be accompanied by a Waste Transfer Note (WTN) for non-hazardous waste or a Special Waste Consignment Note (SWCN) for hazardous waste. Many waste carrier companies operate their own WTN's. These should be checked to ensure that the following information is detailed:
- Producer of the waste.
 - Site name & location.
 - Date.
 - Description of the waste (i.e. contents and volume).
 - EWC number (six figure number e.g. 17 05 04 Soil & Stones).
 - Signature of the waste carrier.
 - Name of disposal site.
- 5.6.6 Once complete, the Waste Transfer Note / SWCN will be signed by the Contractor and a copy retained on site for 2 years (WTN) or 3 years (SWCN).
- 5.6.7 The transfer of Hazardous/Special waste must meet the requirement of a WTN and requires notification to SEPA a minimum of 72 hours before the transfer. In most cases the appointed waste carrier will provide the SWCN and carry out appropriate notification to SEPA.

5.7 DISPOSING WASTE OFF-SITE

- 5.7.1 Waste Management Licences for all sites used for the disposal, transfer or treatment of waste from the Project must be checked to ensure they are permitted to receive the type of waste to be disposed of.
- 5.7.2 Where sites are exempt from requiring a Waste Management License a copy of the appropriate SEPA letter declaring that the site is exempt should be obtained. Checks must be made to ensure that it covers the type of waste to be disposed of.

5.8 RE-USING WASTE ON SITE

- 5.8.1 The re-use of waste on site (eg access track materials) is preferential to disposal but must be undertaken in accordance with a Waste Management Licence (WML) or a written exemption. If it can be demonstrated that the material is not waste then control under waste legislation is not applicable (refer to the Project Materials Management Plan).
- 5.8.2 It is a key aim of the Beaulieu-Denny project to minimise the volume of waste produced. SPT and the Contractors will keep under review materials being generated which may be classed as waste in order to identify suitable re-uses, either within the project itself, or with landowners. In the case of waste materials going to landowners the requirements of Section 5.7 above will apply. For materials classed as 'Not Waste' that

may be sold or provided to Landowners, the Contractors are required to ensure that procedures for the traceability of any transfer are in place.

5.8.3 Waste Exemptions for the re-use of construction materials and soils are contained in Schedule 3 of the Waste Management Licensing Regulations 1994⁵. Table 3 below details those exemptions which may be applicable on the Project.

Table 3: Waste Management Licensing Exemptions

Reference	Description
Paragraph 7	Re-use of waste for treatment of land used for specific purposes where such treatment results in the benefit to agriculture and/ or ecological improvement. This exemption also includes the secure storage of up to 1250 tonnes where it is to be used. The benefit to agriculture or ecology must be demonstrated as the purpose of this reuse e.g. peat storage.
Paragraph 9	Re-use of waste for the purpose of reclamation or restoration of land which has been subject to industrial or other man made development. Certain wastes are only permitted if it results in an agricultural or ecological improvement. Typical wastes that can be used under this exemption are: gravel, rock, sand, concrete, stones. Wastes that will require an improvement to agriculture or ecology include: soil, sludges from wastewater treatment. Storage of waste at the site where it is to be used is also permitted for up to 6 months.
Paragraph 15	Beneficial re-use of waste. However the waste must not have undergone or require treatment and the waste cannot be used for an activity listed in exemptions 7, 9 or 19. This exemption also provides for the storage of waste.
Paragraph 19	Re-use of waste for the construction, maintenance or improvement of specified engineering works (Relevant Work). Relevant work includes building a road/track or drainage works. Typical wastes that can be used in this exemption include: soil and stones, concrete. This exemption also provides for waste storage at the site.

5.8.4 Where required for on-site re-use, waste management licence exemptions will be applied for by the SPT Environmental Management Team.

⁵ http://www.opsi.gov.uk/si/si1994/Uksi_19941056_en_5.htm#sdiv3