

Scottish Hydro Electric Transmission plc
Beauly-Denny Overhead Line Diversion
Environmental Appraisal
Technical Appendices

Appendix A – General Environmental Management
Plan (GEMP) - Oil Storage and Refuelling

July 2025



TG-NET-ENV-510	General Environmental Management Plan (GEMP) – Oil Storage and Refuelling		Applies to
			Transmission ✓
Revision: 2.00	Classification: Internal	Issue Date: March 2024	Review Date: March 2032

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1 Introduction

- 1.1 Oil and fuel, inappropriately used, stored or disposed of, can give rise to pollution of the environment.
- 1.2 Oil and fuel can be released into the environment through:
- Spillages during delivery or use
 - Spillages during refuelling operations
 - Loss during attempted theft or vandalism
 - Spillages from hose bursts
 - Spillages from mechanical failure of plant and their components
 - Inadequate or damaged storage facilities, or
 - Being poured directly to drains or gullies or being burned.
- 1.3 Petrol, diesel and oil are all highly harmful to plants, animals and humans. If pollution is caused, prosecution may follow. The resultant cost of clean-up and legal proceedings following an incident is likely to far exceed the cost of putting proper control measures in place.

2 References

The documents detailed in Table 2.1 – Miscellaneous Documents, should be used in conjunction with this document.

Table 2.1 – Miscellaneous Documents

Reference	Title
https://www.sepa.org.uk/media/dw5de0kh/car-a-practical-guide.pdf	SEPA The Water Environment (Controlled Activities) (Scotland) Regulations 2011
CIRIA (2006) C648 - Control of water pollution from linear construction sites – Technical Guidance	Control of Water Pollution from Linear Construction Sites
https://www.hse.gov.uk/cdg/commonproblems/browsers.htm	Bowser Regulations
https://www.gov.uk/government/publications/carriage-of-dangerous-goods-guidance-note-23	Transporting Diesel, Petrol or Kerosene by Road
Ciria C741	Environmental Good Practice on Site Guide (fourth Edition)

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3 Legislation

- 3.1 The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) apply to any kind of oil including petrol, diesel, mineral oil, heating oil, lubricating oil, waste oil, vegetable and plant oil (except uncut bitumen) stored above ground at premises such as construction sites.
- 3.2 The relevant provisions of Waste Management Licensing Regulations 1994 (as amended) also apply to handling and storage of waste oil.
- 3.3 The carriage of diesel, kerosene and petrol by road is regulated by The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG 2009), as amended.
- 3.4 Petrol, diesel and oils are also covered under the Control of Substances Hazardous to Health Regulations 2002 (COSHH Regs) and need to be stored and used in compliance with these also.

4 General Compliance Requirements

4.1 General

- 4.1.1 Compile a protocol for oil and fuel storage & operations on site, including but not limited to, bulk fuel delivery procedure, refuelling procedure, fuel storage inspections (including spill kit & plant nappy provision and condition) & emergency response procedures.
- 4.1.2 All those undertaking, or involved in, refuelling operations should be nominated on the project as Refuelling Marshals and trained in the approved refuelling procedure.
- 4.1.3 Suitably sized and fully stocked spill kits of the appropriate type are to be located and maintained at all oil & fuel storage locations, refuelling locations and in all site vehicles. Consider the nature of surrounding area when specifying and checking spill kit contents to ensure they provide suitable materials and modify contents accordingly e.g. include floatation bunds if works are near watercourses or, consider inclusion of absorbent granules, shovel and impermeable sheet if the ground is very free draining. Provide suitably labelled plastic sacks for disposal of contaminated wastes arising from used spill kits.
- 4.1.4 Used spill kit materials should be removed as Special Waste. Stocks of spare material are required to be held on site to ensure restocking and replacement can occur in a timely manner.
- 4.1.5 Plant nappies must be available at all refuelling locations for use during refuelling procedure.
- 4.1.6 Where a plant nappy is of two part design the use of plant nappy liners without plant nappy base, or plant nappy base without liner, is not acceptable as their performance will be compromised.

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- 4.1.7 All oil loss events such as spillages, hose bursts etc must be reported in line with Scottish and Southern Electricity Networks (SSEN) reporting procedures.

4.2 Deliveries & Storage

- 4.2.1 Oil and fuel storage areas should be clearly designated and shown on site layout and drainage plans, clearly presented on site and briefed during site inductions. Tool Box Talks are to be used to communicate changes and periodically remind operatives on oil and fuel storage, refuelling procedures and emergency response requirements.
- 4.2.2 The following will be considered as a minimum when identifying the location for fuel storage:
- Maintaining a minimum of 30m from sensitive environmental receptors such as surface waters, surface drainage systems, wetlands, Groundwater Dependent Terrestrial Ecosystems (GWDTEs), drinking water or private water supply catchments.
 - Fuel stores must be sited away from where they could be hit by moving vehicles and plant whilst ensuring ease of access to proposed storage area for oil deliveries / refuelling.
 - Ensuring suitability of ground conditions e.g. can the area be protected against flood damage / inundation / subsidence.
 - Use existing oil interceptor facilities, bunded storage areas or suitable areas of hardstanding, and
 - Locate areas to prevent risk of theft or vandalism.
- 4.2.3 Clear signage should be provided at oil storage areas and designated fuelling areas.
- 4.2.4 Clearly identify any areas where fuelling or fuel storage is not permitted on site plans (e.g. within close proximity to watercourses). Where appropriate, consider additional signage highlighting and defining exclusion zones.
- 4.2.5 During delivery of fuel or oils by a supplier to site, the delivery vehicle must be supervised by a suitably trained Refuelling Marshal when on site. Volume and type of fuels delivered and stored on site should be recorded along with dates of delivery.

4.3 Fuel and Oil Storage Containers

- 4.3.1 All fuel or oil storage containers must:
- Adhere to all and any conditions of the Controlled Activities Regulations (CAR)
 - Be of suitable type for that fuel or oil
 - Be appropriately labelled identifying the contents
 - Be of enough strength and structural integrity to ensure that it is unlikely to burst or leak in its ordinary use

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- Be maintained in good condition
- Not filled beyond design capacity
- Be impermeable to oil or water, and
- Positioned, or other steps taken, to minimise any risk of damage by impact so far as reasonably practicable.

4.3.2 Storage of fuel or oils within 50 gallon / 200 litre drums is not permitted on site. Where waste oil is stored in this equipment it should be for minimal duration and the drum should be placed within a suitably sized bund.

4.3.3 For fuel storage containers of 200 litres or greater these must be checked for compliance with General Binding Rule 28 of the Controlled Activity Regulations, and locked when not in use to prevent unauthorised use and potential spillages arising from such use.

4.3.4 Secondary containment or bunds are required where storage of oil or fuel is within containers over 200 litres. This secondary containment must be checked and maintained regularly, with any liquid or materials within emptied / removed and suitably disposed of to retain required volume.

4.3.5 The storage of oil or fuel in a portable container with a capacity of less than 200 litres must:

- Be securely sealed when not in use so as to contain the fuel in event of tipping of the container
- Be secured during transit within a vehicle so as not to slide, tip or otherwise be put at risk of damage
- Where being stored for any period longer than a day between use, be placed within suitable bunded Control of Substances Hazardous to Health (COSHH) containment when not in use, and
- When not stored within a bunded COSHH container, the container should be stored securely on a plant nappy, away from any sensitive receptors such as watercourses.

4.4 Refuelling

4.4.1 The following must be adhered to for refuelling operations:

- Refuelling operations are to be included within the preparation of a protocol for oil and fuel storage & operations on site
- Undertake refuelling at appropriately sited and set up designated refuelling bays
- Where this is not possible for operational reasons, refuelling should not be undertaken within 30m of surface waters and should follow the above guidance regarding location of any fuel related activities
- Suitably sized spill kits must be easily accessible for all re-fuelling operations and drip trays / plant nappies used during refuelling operations to catch drips and splashes.

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4.5 Construction Plant

- 4.5.1 Plant nappies should be placed under stationary plant and equipment such as oil powered pumps, generators, winches, hydraulic presses, compressors, lighting rigs (where these items are not “integrally bundled”). Hydraulic powered plant such as presses, winches or tensioners may require additional mitigation such as further plant nappies or impervious drip trays.
- 4.5.2 Whilst plant nappies do not provide significant containment capacity, they are easier to manage than impervious drip trays which require increased maintenance to ensure rain water is not contaminated and require to be regularly emptied of rainwater to ensure effectiveness.
- 4.5.3 Static plant should be located at least 30m from any watercourse (or other identified sensitive receptor). Where it is not possible, mitigation should be put in place to reduce the risk or impacts of a pollution incident occurring (including additional capture methods for losses, increased inspection visits of the plant or placement of oil booms).
- 4.5.4 Plant nappies are to be placed under mobile plant on site when parked up and operative is not within plant, for example during breaks, overnight or longer periods. A plant nappy will be assigned to each piece of plant and placed under the area of the plant considered the greatest risk, for example this may be under the engine bay (if unbundled) or under the hydraulic pumps or flexi hoses. Stones maybe placed on the plant nappy to prevent it being blown away in strong winds.
- 4.5.5 Plant nappies should be regularly inspected as part of plant pre-use checks and during other site inspections and should be replaced (or their liners replaced) when deterioration and/ or contamination is evident.

5 Revision History

No	Overview of Amendments	Previous Document	Revision	Authorisation
01	New Document Created	N/A	1.00	Richard Baldwin
02	Reviewed and updated.	TG-NET-ENV-510 (Rev 1.00)	2.00	Richard Baldwin
03				