

# Env Memo 25-62 April 2025

## Environmental Documents Updates:

- Environmental Management Plans
- Concrete washout guidance
- Site drainage guidance
- Waste related documents
- Water related guidance
- New and Updated Environmental Procedures and Guidance
- Sustainability related documents incl. procurement/commercial

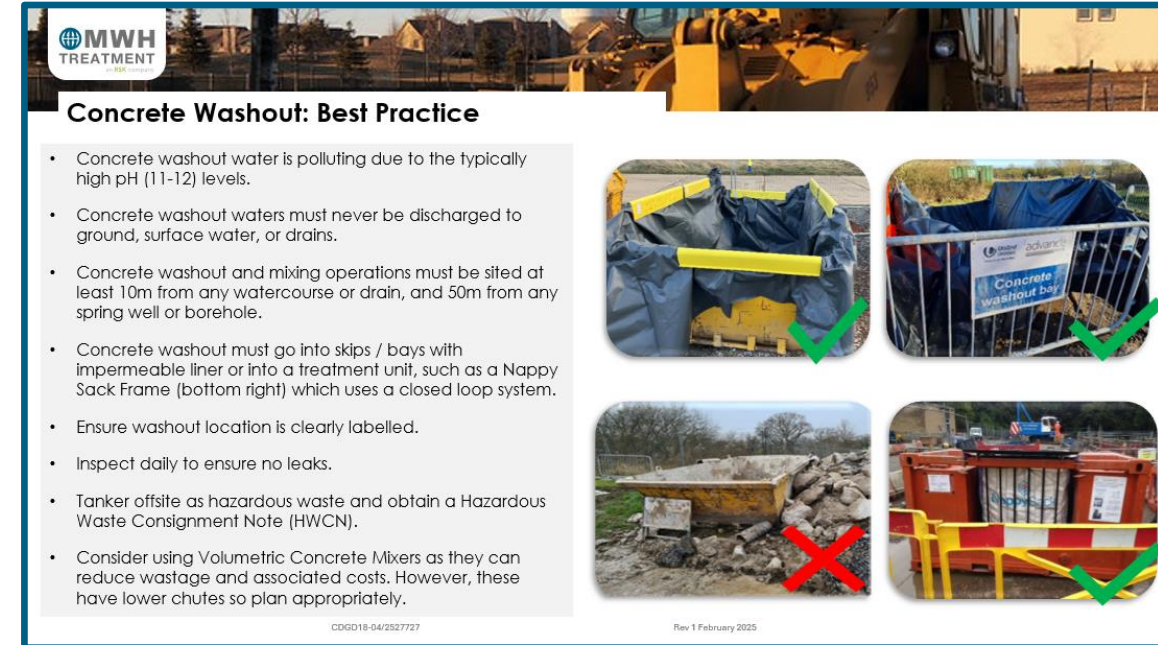




# Concrete Washout Guidance and Posters update

The following documents have been updated or are new:

- Guidance on '[Concrete and Cement - Environmental Considerations](#)' (CDGD18-01) update including use of volumetric concrete mixers; permission for discharge into foul drainage; not using water containing concrete to suppress dust; use of heras fencing locks, pipework offcuts or rebar protection strips to hold liner in place.
- Guidance on '[Controlling Concrete Washout](#)' (CDGD18-02) update covers the latest [Environment Agency Regulatory Position Statement \(EA RPS 287\)](#) for storing, treating and using wastewater containing concrete on a construction site before use or disposal.
- '[Concrete – Environmental Considerations Poster](#)' (CDGD18-01A) updated with new format and more information.
- [CDGD18-03 Concrete Washout Disposal Requirements](#) process flow updated to include Hazardous Waste Consignment Notes Part E return.



The poster, titled 'Concrete Washout: Best Practice', features the MWH TREATMENT logo at the top left. It lists seven key guidelines for concrete washout management, accompanied by four photographs. The top-left photo shows a washout bay with a blue liner and yellow safety barriers, marked with a green checkmark. The top-right photo shows a similar bay with a sign that reads 'Concrete washout bay', also marked with a green checkmark. The bottom-left photo shows a washout area with a red 'X' over it, indicating an incorrect practice. The bottom-right photo shows a washout bay with a sign and yellow safety barriers, marked with a green checkmark. The poster includes the following text:

**Concrete Washout: Best Practice**

- Concrete washout water is polluting due to the typically high pH (11-12) levels.
- Concrete washout waters must never be discharged to ground, surface water, or drains.
- Concrete washout and mixing operations must be sited at least 10m from any watercourse or drain, and 50m from any spring well or borehole.
- Concrete washout must go into skips / bays with impermeable liner or into a treatment unit, such as a Nappy Sack Frame (bottom right) which uses a closed loop system.
- Ensure washout location is clearly labelled.
- Inspect daily to ensure no leaks.
- Tanker offsite as hazardous waste and obtain a Hazardous Waste Consignment Note (HWCN).
- Consider using Volumetric Concrete Mixers as they can reduce wastage and associated costs. However, these have lower chutes so plan appropriately.

CDGD18-04/2527727 Rev 1 February 2025

- New [Concrete Washout Best Practice Poster](#) (CDGD18-04) with overview of requirements to be displayed on site.

# Site Drainage Guidance update

## Guidance on Site Drainage (EVGD01-15) update:

- Incorporates the use of oil and sediment drainage filters such as 'Gulley Guards' to be in place.
- 'Gulley Guards' are to be used where surface water run-off poses a risk.
- Check before buying if the gully guard matches your requirements. Can come with hydrocarbon (oil) detection.
- Use of dye testing to determine correct discharge routes of drainage.
- Considerations on location of portable toilets.
- Updated guidance on [How to Complete a Spill Drill](#) (EVGD04-13)
- New(ish) poster / guidance on [Spill Response and Protection of Surface Water Drains](#) (EVGD04-24) – covers HVO and FAME fuels.
- Poster available on [Fuel, Oil and Chemical Storage: Best Practice](#) (EVGD04-25).



### Spill Response and Protection of Surface Water Drains

The spill response measures outlined here are applicable to both fossil fuels and Hydrotreated Vegetable Oil (HVO) due to their similar chemical composition. Due to its water solubility, FAME biodiesel may require additional measures in spill protection.



For use with oil and fuel (including HVO).

- 120-litre Oil/Fuel Spill Kit (White) for use where construction machines or vehicles are present.
- All construction sites which hold a fuel bowser on site should have a minimum of a 240-litre fuel/oil spill kit.

#### Minimum Content:

- Absorbent socks
- Spill pads
- Absorbent pillows
- Disposal bags, ties and gloves



- 120-litre Chemical Spill Kit (Yellow) For use with hazardous or dangerous chemicals, such as caustic or acidic substances.
- Appropriate PPE (chemical gloves, eye protection) should be used and stored alongside. To be always used by trained personnel.



- 20L Chemical Spill kit (Yellow)
- 20L Oil/Fuel Spill Kit (White)
- All CoSHH stores, vans and mobile plant to be supplied with a minimum of a 20-litre spill kit. Consider location, plant size and potential spill volume before dedication of spill kits.

#### Minimum Content:

- Absorbent socks
- Spill pads
- Disposal bag and ties

- Plant nappies and enviropads are used as standard on our sites for capturing any oil, diesel, petrol and HVO spillages.



- Multi-purpose drip trays such as 'EcoMats,' Absorbs leaks and spills including oils, chemicals, fuels, anti-freeze, AdBlue & heavy metals.
- FAME biodiesel may require a bund or plastic drip tray under a spill mat.



- Oil and sediment drainage filters such as 'Gully Guards' for use where surface water run-off poses a risk.
- Check before buying if the gully guard matches your requirements. Can come with hydrocarbon (oil) detection.

- Site specific spill kit requirements to be outlined in the project EVFR01-01a Environmental Management Plan (EMP) and the EVFR04-01 Site Environmental Emergency Plan
- Refer to Guidance Note [EVGD04-03](#) for the Spill Emergency Plan and [EVGD04-04](#) Site Spill Response Procedure Poster.

# Waste Related Updated Documents

## [EVPR03 Waste and Resource Management](#)

Updates including:

- Incorporated new(ish) requirement for Site Waste Management Plan Kick Off Meeting (EVFR03-12)
- Assessing potential design decisions and construction techniques regarding waste minimisation
- Reuse of excavated materials
- Use of ActivSHEQ for record keeping and the online Site Material & Waste Management Plan
- Simpler Recycling requirement (England)

## **NEW** [EVGD03-31 Office Waste Segregation Posters](#)

Editable posters to be displayed in offices and on site – this can be used to help comply with ‘Simpler Recycling’ requirements.

## **Updated** [EVGD03-03 Waste Disposal \(Offices\)](#)

Updated in line with the Separation of Waste (England) Regulations 2024 and Simpler Recycling.

**Updated Toolbox Talks** to include Simpler Recycling requirements:

- [EVTT03-01 Waste Handling and Removal](#)
- [EVTT03-02 Waste Segregation](#)

## [EVGD03-01 Waste Management and Handling](#)

Updates including:

- Overview of when a material is not classed as a waste (EA guidance)
- New section on Excavated Material Segregation and Storage
- Increased information on waste hierarchy legal compliance
- Removal of metals
- The Separation of Waste (England) Regulations 2024 and Simpler Recycling requirements



# Waste Related Guidance Updates

## [EVGD03-05 Waste Removal Requirements](#)

Updates including:

- Copies of Waste Carrier Registrations and Environmental Permits to be stored on ActivSHEQ
- Further details on documentation to be retained

## [EVGD03-17 Waste Exemptions \(England and Wales\)](#)

- Mention of Government future reform of waste exemptions 2024/25.
- Low Risk Waste Positions on certain waste operations e.g. Dewatering and cleaning grit washings from sewage treatment works (LRWP 3).

## [EVGD03-24 Classifying Highway Road Materials](#)

New section regarding Environment Agency Regulatory Position Statements:

- RPS 298: Classify excavated waste from street and utility works
- RPS 299 Storing and managing excavated waste from street works

## [EVGD01-50 Land Contamination](#)

Update includes:

- Statement on UXO 'J-curve' – where bombs may be present if a neighbouring site has been bombed.
- Details on asbestos contamination in compliance with CIRIA C733 document and CL:AIRE CAR-SOIL
- Asbestos hazardous waste classification

## [EVGD03-13 Disposing of Special Waste - Scotland](#)

Now includes movement of special waste around the same site and further information on different types of consignments.

## [EVGD03-51 Imported Materials Protocol](#)

New section regarding Environment Agency Regulatory Position Statement RPS247 Using unbound incinerator bottom ash aggregate (IBAA) in construction activities.

## [EVGD03-09 Landfill - Acceptance of Waste](#)

Updates including:

- Further details on waste not accepted at landfill, and what needs to be pre-treated, and gypsum-based waste
- New sections on removal of organic materials, new section on disposing of problematic waste



# Water Related Updated Guidance Documents

## **Guidance [EVGD01-52 Fuel and Oil](#)**

Updated to include:

- New section on Construction Site Carbon Requirements; further information on use of hybrid generators
- Mandatory spill drill requirements
- Use of plant nappies, enviropads, and “eco mats”

## **Guidance [EVGD04-01 Pollution Prevention Planning](#)**

Updated to include:

- Further information on identifying site risks
- Reference to the poster Spill Response and Protection of Surface Water Drains (EVGD04-24)
- Display of the emergency call out poster

## **Guidance [EVGD01-22 Underground Storage Tanks](#)**

Updated to include:

- Information on petrol storage systems regulated by Local Council Petroleum Enforcement Officer
- GRP underground tanks

## **Form [EVFR05-08 Overpumping Permit](#)**

Updated to include:

- Example scenarios when to use and when not to use.

## **Guidance [EVGD04-13 How to Complete a Spill Drill](#)**

Updated:

- To include new photographs
- New wording and references to new documents such as [Spill Response and Protection of Surface Water Drains](#)

## **Guidance [EVGD01-19 Water Treatment and Supply](#)**

Updated to include:

‘Out of specification waters’ that come from water treatment works (WTW) and water supply assets that cannot be used in drinking water supply so have to be discharged to the surface waters should comply with EA’s RPS 280

## **Guidance [EVGD05-08 Treatment and Disposal Of Site Water \(England and Wales\)](#)**

Updated to include:

- New section on Discharge of Dewaterings from Underground Ducts or Chambers
- Discharge from water treatment assets (Section 166 consent)



# New and Updated Environmental Procedures and Guidance

## **NEW Procedure [EVPR07 Environmental Planning](#)**

This covers all the initial environmental planning activities during outline and detailed design to ensure Planning Permission, Environmental Permits, Consents and Licences are in place.

## **Guidance [EVGD05-03 Biodiversity Net Gain](#)**

Update includes:

- Details on Biodiversity Enhancement Strategy and Biodiversity Gain Plans (requirements)
- Updated client requirements
- New section on The Environment Act requirements
- Improvement on existing management section – now covering ‘Development of Detailed Strategy/Plan’

## **NEW Guidance [EVGD01-60 Nuisance: Air Pollution](#)**

incorporates an overview of the Institute of Air Quality Management (IAQM) [‘Assessment of dust from demolition and construction’](#).

## **Guidance [EVGD39-03 Environmental Nuisance Noise and Vibration](#)**

Updated to reflect updated BS4142:2014 + A1:2019 Methods for rating and assessing industrial and commercial sound

## **Procedure [EVPR05 Environmental Compliance](#)**

Update includes:

- References and removal of overlap with the new Environmental Planning procedure (EVPR07)
- Requirement for Project Dewatering meeting (EVFR05-10)



## **Guidance [EVGD05-17 Medium Combustion Plant Requirements \(England and Wales\)](#)**

Update includes:

- Dates for required permit compliance
- Added to the definition of ‘existing combustion plant’



# Sustainability (incl. carbon) related documents

## **Guidance [CMGD03-02 Environmental and Quality Subcontract Statements](#)**

Significant update includes:

- A new Sustainability section covers - sustainability related objectives, supporting applying carbon reduction measures, sustainability reporting and project social value
- New section on water quality
- Added an indemnity clause
- Revised environmental pollution related clauses

## **[PMGD01-04 MWH Treatment Terms and Conditions](#) - for Products and Materials**

+ *other Terms and Conditions documents*

Now includes specific section on sustainability covering requirement for provision of sustainability and carbon data (such as Environmental Product Declarations); geographical locations for material sourcing.

## **Policy [MP06 Procurement](#)**

Updated to include low carbon, collaboration and adoption of principles of ISO20400 for Sustainable Procurement.

## **Policy [MP17 Sustainable Procurement](#)**

Update includes:

- adoption of the principles of ISO 20400: 2017 Sustainable Procurement
- specific mention to collaboration with supply chain regarding carbon reduction
- promotion of low carbon solutions
- promotion of the Living Wage

## **Policy [MP25 Anti-Modern Slavery](#)**

Updated to remove outdated term 'zero tolerance' to modern slavery. It now refers to 'all work being conducted on a voluntary basis'.

