

Transmission and Distribution Steel Lattice Tower Refurbishment Good Practice Guide

Made under the Partnership Agreement between the Member Companies of the Energy Networks Association (ENA) and the Environment Agency

Introduction

This document provides guidance on the operational approach that each of the ENA electricity member companies should ensure is in place to minimise the potential environmental and health risks associated with the maintenance of electricity transmission and distribution steel lattice towers.

The refurbishment of towers is an established, necessary and commonly used preventative maintenance practice. The maintenance contributes to meeting the legal duties placed on licensed transmission and distribution companies to:-

- maintain an electricity supply and
- ensure any risk to the health, safety and welfare of the public is minimised.

Any work activity that is required to meet this legal obligation will be subject to an overarching risk assessment approach that seeks to eliminate or minimise any health and safety or environmental hazards through the use of suitable and sufficient control measures. This takes into account the impact on workers, members of the public, the wider environment (land, air and water) and any livestock that may be present.

The potential environmental risks associated with tower maintenance include:

- accessing sensitive locations e.g. watercourses, lakes, SSSIs
- waste production during paint removal (delamination)
- air borne dust and debris
- use and storage of polluting materials e.g. oils, fuels, paints / cleaning products

Methodology

Site specific risk assessments will inform individual method statements and this will be for the companies undertaking the work to determine and implement as necessary depending on the specific circumstances. This site specific approach will be supported by following a common general methodology. The emphasis will be on eliminating or minimising the generation of waste streams but also taking into account any risk to staff, members of the public or the environment. The general methodology will include the following points:-

- All legislative requirements e.g. permissions/permits associated with the work will be identified and in place prior to the start of the project.

- Operations will only be undertaken by competent and appropriately trained workers.
- Operations will be carried out in accordance with identified, established policies, procedures and practices.
- Operations will be carried out with due regard to current environmental good practice advice and guidance
- Prior to the maintenance work commencing liaison will take place with the landowner and any other affected or interested third parties e.g. Local Authority, Environmental Regulator.
- Liaison will include agreeing access, the site method statement and providing a company contact directly responsible for the work.

ENA Member Companies agree that the implementation of and adherence to the above guidance is adequate to minimise the health, safety and environmental risks from tower refurbishment activities.

This good practice guide is now promoted to all other third parties to demonstrate that electricity companies have suitable consistent controls in place covering this activity.