

ENVIRONMENTAL MANAGEMENT PROGRAMME

FOR THE

EXTRUDED POLYSTYRENE (XPS) PLANT, ERF 245, 3 CHARLES MATTHEWS STREET, ATLANTIS INDUSTRIAL, BY SWARTLAND INSULATIONS (PTY) LTD

2nd DRAFT

July 2019

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COMMITMENT AND DECLARATION OF UNDERSTANDING BY CONTRACTOR AND DEVELOPER FOR THE EXTRUDED POLYSTYRENE (XPS) PLANT, ERF 245, 3 CHARLES MATTHEWS STREET, ATLANTIS INDUSTRIAL, BY SWARTLAND INSULATIONS (PTY) LTD

I, the undersigned, as duly authorized by the Contractor, have studied and understand the contents of this document. On behalf of the Contractor, I confirm that the Contractor undertakes to adhere to the conditions as set out herein, unless specifically otherwise agreed to in writing.

Signed at on this Day of20.....

.....
For Contractor

I, the undersigned, as duly authorized by the Developer have studied and approve the contents of this document on behalf of the Developer, for implementation by all Contractors involved at the site.

Signed at on this day of20.....

.....
Developer's Representative

DEFINITIONS

Auditing:	A systematic and objective assessment of an organization's activities and services conducted and documented on a periodic basis based to a (e.g. ISO 19011:2011) standard.
Biodiversity:	The variety of life in an area, including the number of different species, the genetic wealth within each species, and the natural areas where they are found.
Contractor:	An employer, as defined in section 1 of the Occupational Health and Safety Act 85 of 1993, who performs construction work and includes principal contractors
Environment:	A place where living, non-living and man-made features interact, and where life and diversity is sustained over time.
Evaporation:	The change by which any substance (e.g. water) is converted from a liquid state into and carried off as vapour.
Developer:	One who builds on land or alters the use of an existing building for some new purpose
Independent:	Is independent and has no interest in any business related to the development site, nor will receive any payment or benefit other than fair remuneration for the task undertaken
Groundwater:	Subsurface water in the zone in which permeable rocks, and often the overlying soil, are saturated under pressure equal to or greater than atmospheric.
Landowner:	Holder of the estate in land with considerable rights of ownership or, simply put, an owner of land
Monitoring:	A systematic and objective observation of an organisation's activities and services conducted and reported on regularly.
Monitoring programme:	A programme for taking regular measurements of the quantity and quality of a water resource, waste or wastewater discharge at specified intervals and at specific locations to determine the chemical, physical and biological nature of the water resource, waste or wastewater discharge.
Natural vegetation:	All existing vegetation species, indigenous or otherwise, of trees, shrubs, groundcover, grasses and all other plants found growing on a site.
Pollution:	The result of the release into air, water or soil from any process or of any substance, which is capable of causing harm to man or other living organisms supported by the environment.
Protected Plants:	Plant species officially listed under the Threatened or Protected Species regulations as well as on the Protected Plants List (each province has such a list), and which may not be removed or transported without a permit to do so from the relevant provincial authority.
Red Data Species:	Plant and animal species officially listed in the Red Data Lists as being rare, endangered or threatened.
Rehabilitation:	Making the land useful again after a disturbance. It involves the recovery of ecosystem functions and processes in a degraded habitat.

Rehabilitation does not necessarily re-establish the pre-disturbance condition, but does involve establishing geological and hydro logically stable landscapes that support the natural ecosystem mosaic.

Site: Property or area where the proposed development will take place

ACRONYMS

DEA&DP:	Department of Environmental Affairs and Development Planning
DWS:	Department of Water and Sanitation
ECO:	Environmental Control Officer
EA:	Environmental Authorisation
EIA:	Environmental Impact Assessment
EM:	Environmental Manager
EMP:	Environmental Management Programme
EO:	Environmental Officer
ER:	Engineer's Representative
I&AP:	Interested and Affected Party
IEM:	Integrated Environmental Management
MS:	Method Statement
PM:	Project Manager
SANS:	South African National Standards

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DEVELOPER'S COMMITMENT

The Swartland Insulation (Pty) Ltd ("Swartland") has committed itself to a set of values that include the maintenance of good relations and transparent communications with all stakeholders, and the dynamic engagement of the larger community.

Swartland undertakes to implement suitable management systems for all the areas and aspects of this operation. This will ensure that development itself and management of the project will comply with legal, technical, environmental and transformation policies and standards.

Swartland, in drafting this EMP for implementation, intends to enable continuous improvement in legal compliance and the sustainable operation of the site.

The EMP intends to change the way in which the owners, the construction process they have commissioned and the contractor plan for and manage resources to achieve sustainability.

The satisfactory implementation of the EMP on site will require both the full support and commitment of all personnel.

EXTENT OF CONSTRUCTION WORK

The expected duration is 11 months.

New infrastructure includes:

- Blowing Agent storage will be via dedicated tanks located on the eastern boundary of the site (new)
- Blowing Agent will be transferred to the process building via pipework (new)
- XPS will be stored in the XPS Finished Board Storage Area to the west and south-west of the site (new)
- Structural grid and loading platform for 24m articulated trucks (new)
- New reclaiming building with reclaiming plant (new)
- Silo (new)
- Filter Unit (new)
- Chiller (new)
- Gas pumps (new)
- Internal road (new)
- XPS extrusion machine installation inside existing building
- Interior upgrades to existing buildings if required

CHAPTER 1

1.1. Executive Summary

This EMP has been prepared principally in compliance with the requirements of section 24N and Section 34 of the National Environmental Management Act 107 of 1998. This document, together with the conditions in the Environmental Authorisation, must be adhered to.

The EMP must be included as part of all contract documentation for all contractors in the construction phase of the development.

The Author and Eco Impact Legal Consulting (Pty) Ltd ("Eco Impact")

Eco Impact is an independent consulting company and has no interest in any business related to the development site, nor will it receive any payment or benefit other than fair remuneration for the task undertaken, as required in terms of the NEMA Regulations.

This report has been prepared by Jessica Hansen, of Eco Impact, an environmental consultancy, engaged in providing professional services in the field of environmental planning, -systems, -auditing and -biodiversity assessment and -management.

Jessica has a BSc (Honours) in Environmental and Geographical Science in 2011 from the University of Cape Town and subsequently obtained her MSc in Zoology in 2013.

Jessica has trained as an Environmental Assessment Practitioner since August 2013 and has been involved in the compilation, coordination and management of Basic Assessment Reports, Environmental Impact Assessments, Environmental Management Programmes, Waste Licence Applications, Water Use Licence Applications and Baseline Biodiversity Surveys for numerous clients.

Swartland has appointed Eco Impact to prepare an Environmental Management Programme that meets the technical standards as required by DEA&DP.

1.2. Project Description

This section of the report is included in compliance with Section 24N (2) (e) of the National Environmental Management Act, 107 of 1998.

The proposed development entails the proposed storage of dangerous goods for the establishment of an extruded polystyrene plant and associated infrastructure.

The site will be home to an Extruded Polystyrene (XPS) process. Polystyrene (PS) raw material will be stored in a covered storage area and received into the main factory building where an XPS extrusion machine will be installed.

Resin (made up of Polystyrene (94% of the resin), New-cleating, Flame retardant material, Colour and Process Aid) will be combined with blowing agents (CO₂, Dimethyl Ether (DME), R152a and Ethanol (Etoh)) in a specific combination to produce the XPS end product.

Extruded polystyrene foam (XPS) is produced by a continuous extrusion process. Virgin Polystyrene pellets are mixed with pellets containing flame retardant colour and nucleating agents. This mix is fed into the first extruder where the material is melted from the rotating screw. Once the polymer is melted, one or more gases are injected into the melt stream in their liquid state. These liquified gases are dissolved into the polymer mix. The mix passes from the first extruder to the second extruder via a heated pipe. Both extruders are designed to run at elevated pressures to ensure the dissolved gases do not gasify and foam prematurely.

The second extruder is larger in diameter and is designed to cool the melt to increase the melt strength of the polymer for it to be able to hold the dissolved gases as they come out of solution upon exiting the die. The pressurized melt is cooled from approximately 200°C to around 135°C in this second extruder.

The material exits through a slot die and the gases expand as the pressure drops. The nucleating agent creates a nucleus for bubble formation. The gases coalesce around each nucleus to create bubbles.

The heat of vaporization takes energy from the material which cools the foam further. The foam material expands from the die between two horizontal calibration plates which control the final thickness. Variations in the slot die opening and the calibrator plate position allow board thicknesses between 20 and 200mm.

The board continues through the calibrator and is now cold enough to keep its shape. It continues downstream for a further 30 to 60m to allow it to cool further. After cooling, the board edges are removed by milling to achieve the desired width. The continuous board is then cut to length and can be further treated to add surface patterns or grooves. The retained gases inside the foam structure increase the insulation value of the board.

Material Receipt

The following materials are received onsite via bulk truck or road tanker:

(A) Materials making up the resin:

- Polystyrene (94% of the resin), the balance of which contains
- New-cleating
- Flame retardant – **NEMA dangerous good**
- Colour
- Process Aid

(B) Blowing agents:

- CO₂
- Dimethyl ether (DME) – **NEMA dangerous good**
- 152a (gas)
- Ethanol – **NEMA dangerous good**

Storage

(A) Materials making up the resin:

- Polystyrene
Crystal Polystyrene (in the form of small spherical beads). Polystyrene is an organic compound with the chemical formula: (C₈H₈)_n. It is a synthetic aromatic hydrocarbon polymer made from the monomer styrene. Polystyrene can be solid or foamed. Polystyrene, a hard, transparent synthetic resin produced by the polymerization of styrene. 18048,00 kg/day (Volume to be stored on site 400m³)
- New-cleating - Talc - Hydrous magnesium silicate 192,00 kg/day (Volume to be stored on site 10m³)
- Flame retardant - <45% Brominated SBS polystyrene-polybutadiene- polystyrene/Benzene, ethenyl-, polymer with 1,3-butadiene, brominated & <10% Polystyrene with 1,3-butadiene polymer & <5%Carbonato(2) hexadecahydroxvbis(aluminium)hexamaqnesium 768,00 kg/day (Volume to be stored on site 50m³) – **NEMA dangerous good**
- Colour - Blend of organic and inorganic pigments dispersed in an ethylene methylacrylate copolymer. Polymeric masterbatch consists of ethylene copolymer, PE wax, Zinc stearate, Titanium Dioxide Pigment White 6, Carbon Black Pigment Black 7, Pigment Yellow 191, and Calcium carbonate. 96,00 kg/day (Volume to be stored on site 10m³)
- Process Aid - Zinc Oxide 96,00 kg/day (Volume to be stored on site 10m³)

Materials making up the resin will be in inside in the dedicated raw material storage areas north-west of the site. This includes the Flame Retardant which is a NEMA dangerous good. The Flame retardant will be stored in 25 kg bags as delivered by supplier.

(B) Blowing agents:

Blowing Agent storage will be via dedicated tanks located on the eastern boundary of the site.

- CO₂ (18 m³) – one vertical tank above ground - Vapour at room temperature, stored onsite as a liquid
- Dimethyl ether (DME) (45m³) – one horizontal tank above ground - Vapour at room temperature, stored onsite at liquid-vapour equilibrium – **NEMA dangerous good**
- 152a (gas) (9m³) – two above ground tanks - Vapour at room temperature, stored onsite at liquid-vapour equilibrium
- Ethanol (9m³) – one above ground tank - **NEMA dangerous good**

Tank placement was based on gas specialists' recommendations (A Gas, Pure Gas, Air liquid and GPS).

(C) Products:

- XPS end product (Volume to be stored on site 24500m³) - will be stored in the XPS Finished Board Storage Area to the west and south-west of the site.

Material transportation

PS will be transferred to the process building via 25 kg bags. Blowing Agent will be transferred to the process building via pipework.

- DME piping specification: ASME 106A
- CO2 piping specification: EN 13480
- High pressure piping specification: SANS 10260 (all parts)
- R 152a piping specifications: 316 stainless steel

Dispatch of Material

XPS dispatch

XPS will be dispatched from the Finished storage area, via truck.

Infrastructure

- Existing factory building in the north west corner (existing)
- Raw material storage area north-west of the site (existing)
- A second raw material storage area will be in the south west corner of the main factory building (existing)
- Blowing Agent storage will be via dedicated tanks located on the eastern boundary of the site (new)
- Blowing Agent will be transferred to the process building via pipework (new)
- XPS will be stored in the XPS Finished Board Storage Area to the west and south-west of the site (new)
- Structural grid and loading platform for 24m articulated trucks (new)
- Flammable liquids store (existing)
- New reclaimer building with reclaiming plant (new)
- Silo (new)
- Relocated store with chipper (existing)
- Filter Unit (new)
- Chiller (new)
- Gas pumps (new)
- Internal road (new)
- Office buildings (existing)
- Parking bays (existing)
- Main factory building with XPS extrusion machine (existing building)

CHAPTER 2

This section of the report is included in compliance with Section 24N (2) (e) of the National Environmental Management Act 107 of 1998.

It deals with issues relating to the implementation of the EMP.

2.1 Organizational Structure

The organizational structure identifies and defines the responsibilities and authority of the various persons and organizations involved in the project. All instructions and official communications regarding environmental matters must follow the organizational structure.

The Environmental Official (EO), to whom the Engineer's Representative (ER) and/or Environmental Control Officer (ECO) must report and interact, must be the responsible client representative.

The EMP must be an agenda item at the monthly site and operations meetings and the responsible client representative(s) may attend these meetings in order to provide input with respect to compliance with the EMP.

2.2 Responsibilities and Functions of the Environmental Control Officer

The ECO will be responsible for monitoring, reviewing and verifying compliance with the EMP and/or EA by all contractors and site management during site visits.

The ECO duties in this regard will include the following:

With the assistance, where necessary of the ER, to ensure all necessary environmental authorizations and permits have been obtained and are available and visible on site at the ER offices.

- monitor and verify that the EMP and/or EA is adhered to at all times and by taking action if the specifications are not followed;
- monitor and verify that environmental impacts are kept to a minimum;
- review and approve construction method statements, with input as appropriate from the ER;
- assist the contractor in finding environmentally responsible solutions to problems;
- report on the environmental issues at the site meetings and other meetings that may be called regarding environmental matters, if requested by ER;
- inspect the site and surrounding areas regularly with regard to compliance with the EMP and/or EA;
- monitor the environmental awareness training for all personnel coming onto site;
- advise management on the removal of person(s) and/or equipment not complying with the specifications, after collaboration with the ER. Recommendations must be recorded by the ER in Site Instruction Book.
- ensure that activities on site comply with known legislation of relevance to the environment;
- recommend the issuing of penalties via the developer for contraventions of the EMP and/or EA;
- keep a photographic record of progress on site from an environmental perspective; and
- undertake a continual internal review of the EMP and/or EA and submit a report to the developer and the responsible DEA&DP Environmental Official as according to EA conditions.

2.3 Agreed Work Plan and Site Visit Schedule of ECO

After initial construction start-up site visit it is recommended that an ECO site visit be conducted once during construction. As such three site visits are recommended, start-up, once during construction and a closure audit.

Information recording activity on site, and any guidelines or instructions emanating there from will be routinely made available electronically to the developer and applicable contractors and a copy of the report must be available at the site office.

Clearly matters of urgency or immediate action may be channelled appropriately on an urgent basis.

2.4 Site Manager

The site manager will have the following environmental control responsibilities:

- Present the environmental education programs to all persons employed on site.
- Consult with the ECO, landowner, developer and any contractor to resolve all environmental issues.
- Issue any instructions from the ECO to the management team via a formal site instruction book or appropriate management tool used for the purpose.
- Take responsibility for the penalty system. The ECO and developer recommendations must be considered when deciding whether or not to impose a penalty.
- The engineer will, via the ECO actions, be accountable for the overall implementation of the Environmental Management Programme.
- Keep a site diary and complaints register.

2.5 Contractors

As part of any tender, the tendering contractor must submit a first draft of a contractor's programme, to the developer which must include the environmental considerations to be followed prior to appointment.

The appointed Contractor's representative will have the following responsibilities:

- Ensure that all staff is familiar with the Environmental Management Programme, which explains the environmental policy for the project.
- Allow for sufficient time between surveying the exact locations where services will be intended and actual construction, for the ECO to facilitate and instruct for the removal of plants, seeds and cuttings if necessary.
- The contractor must keep his personnel fully aware of environmental issues and ensure they show adequate consideration to all environmental aspects.
- Establish environmental signs to be erected on the construction site at locations identified by the ECO and approved by the engineer.
- Be responsible for the cost of the restoration of any damage caused, in environmentally sensitive areas, as a result of contractor responsibility regarding negligence. This must be done in accordance with the engineer / ECO's specifications.
- Take responsibility and active steps to avoid any increase in the fire hazard.
- The contractor must take responsibility for implementing all the relevant provisions of the EMP, or if he encounters difficulties with the specifications, he must discuss alternative approaches with the ECO and engineer prior to proceeding.

Failure to comply with the EMP may result in the application of fines as set out, and any reported non-compliance may result in the suspension of work or termination of a contract.

2.6 Record keeping of activities, inclusive of recording of non-compliances and corrective actions

The site must keep a record of all activities relating to environmental matters on site, including:

- Meetings attended;
- Method statements received and approved;
- Issues arising on site;
- Cases of non-compliance with the EMP;
- Corrective action taken and penalties issued.

This information will be recorded in an appropriate manner in a site diary, registers, issues/warning book, etc.

2.7 Compliance with other legislation

It is important that all on site staff are aware of other relevant legislation that may relate to the activities taking place on site, especially local authority required compliances.

CHAPTER 3

Applicable Legislation, Policy and Environmental Principles

3.1 Applicable Legislation Identified

1. ADVERTISING ON ROADS AND RIBBON DEVELOPMENT ACT, 21 OF 1940
2. BASIC CONDITIONS OF EMPLOYMENT ACT, 75 OF 1997
3. COMPENSATION FOR OCCUPATIONAL INJURIES AND DISEASES ACT, 130 OF 1993
4. CONSERVATION OF AGRICULTURAL RESOURCES ACT, 43 OF 1983
5. CONSTITUTION OF THE REPUBLIC OF SOUTH AFRICA, 1996
6. ENVIRONMENT CONSERVATION ACT, 73 OF 1989, WESTERN CAPE NOISE CONTROL REGULATIONS
7. EMPLOYMENT EQUITY ACT, 55 OF 1998
8. ENVIRONMENT CONSERVATION ACT, 73 OF 1989
9. FENCING ACT, 31 OF 1963
10. HAZARDOUS SUBSTANCES ACT, 15 OF 1973
11. LABOUR RELATIONS ACT, 66 OF 1995

12. NATIONAL HEALTH ACT 61 OF 2003
13. NATIONAL HEALTH ACT 61 OF 2003 REGULATIONS RELATING TO THE MANAGEMENT OF HUMAN REMAINS
14. NATIONAL BUILDING REGULATIONS AND BUILDING STANDARDS ACT, 103 OF 1977
15. NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 107 OF 1998
16. NATIONAL ENVIRONMENTAL MANAGEMENT: AIR QUALITY ACT, 39 OF 2004
17. NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 10 OF 2004
18. NATIONAL ENVIRONMENTAL MANAGEMENT: WASTE ACT, 59 OF 2008
19. NATIONAL FORESTS ACT, 84 OF 1998
20. NATIONAL HERITAGE RESOURCES ACT, 25 OF 1999
21. NATIONAL VELD AND FOREST FIRE ACT, 101 OF 1998
22. NATIONAL WATER ACT, 36 OF 1998
23. OCCUPATIONAL HEALTH AND SAFETY ACT, 85 OF 1993
24. TOBACCO PRODUCTS CONTROL ACT, 83 OF 1993
25. WATER SERVICES ACT, 108 OF 1997
26. CITY OF CAPE TOWN BY-LAWS RELATING TO AIR QUALITY MANAGEMENT, 2016
27. CITY OF CAPE TOWN BY-LAWS RELATING TO COMMUNITY FIRE SAFETY, 2002
28. CITY OF CAPE TOWN BY-LAWS RELATING TO ELECTRICITY SUPPLY, 2010
29. CITY OF CAPE TOWN BY-LAWS RELATING TO ENVIRONMENTAL HEALTH, 2003
30. CITY OF CAPE TOWN BY-LAWS RELATING TO INTEGRATED WASTE MANAGEMENT, 2009
31. CITY OF CAPE TOWN BY-LAWS RELATING TO MUNICIPAL PLANNING, 2015
32. CITY OF CAPE TOWN BY-LAWS RELATING TO OUTDOOR ADVERTISING AND SIGNAGE, 2001
33. CITY OF CAPE TOWN BY-LAWS RELATING TO PARKING, 2010
34. CITY OF CAPE TOWN BY-LAWS RELATING TO STORMWATER MANAGEMENT, 2005
35. CITY OF CAPE TOWN BY-LAWS RELATING TO STREETS, PUBLIC PLACES AND THE PREVENTION OF NOISE NUISANCES, 2007
36. CITY OF CAPE TOWN BY-LAWS RELATING TO TRAFFIC, 2011
37. CITY OF CAPE TOWN BY-LAWS RELATING TO WASTE MANAGEMENT, 2000
38. CITY OF CAPE TOWN BY-LAWS RELATING TO WASTEWATER AND INDUSTRIAL EFFLUENT, 2014
39. CITY OF CAPE TOWN BY-LAWS RELATING TO WATER, 2010

CHAPTER 4

This section of the report is included in compliance with Section 24N (2) (e) of the National Environmental Management Act, 107 of 1998.

Compliance

4.1 Monitoring and Auditing

4.1.1 Introduction

In keeping with current environmental and associated legislation, all environmental management procedures and actions must be reviewed and refined on an ongoing basis.

This is in accordance with the dynamic nature of environmental management and allows for the timeous identification and mitigation of issues as they come to light.

The process of review and refinement, built into the requirements of the EMP, is known as monitoring and auditing.

4.1.2. Roles and Responsibilities

Efficient implementation of the performance specifications, effective monitoring and auditing, as well as clear responsibility and accountability allocation requires that various role-players be defined for the construction implementation project.

Depending on the nature and scale of a project, implementing teams could be composed of any number of role-players, each with their own specified responsibilities.

Therefore, for the purpose of this document, the following role-players are defined, based purely on responsibility and accountability allocation. The actual designation of role-players may vary, but the responsibilities will largely remain as stated.

4.1.2.1. Developer/landowner or custodian of the land

The developer/landowner or custodian of the land is the person or organization with decision making capacity for the land in question, and thus ultimately accountable for what takes place on that land.

4.1.2.2. Contractor

Contractors are appointed to undertake the works as specified in the contract. It is the responsibility of the contractor to do whatever is necessary from their side to ensure that he or an appointed advisor is well versed in environmental studies, so that they may accurately and efficiently carry out the requirements of the environmental specification.

The contractor is liable for any and all remedial work required in terms of the environmental specification, resulting from his environmental negligence, mismanagement and / or non-compliance.

4.1.2.3. Environmental Control Officer

An environmental control officer will manage and undertake an initial environmental inspection and one site inspection per month during construction.

The contractors or line management are answerable to the ECO for non-compliance. Issues of non-compliance raised by the ECO/EO must be taken up by the project manager, and resolved as per the conditions of his contract.

Decisions regarding environmental procedures, specifications and requirements which have a cost implication (i.e. those that are deemed to be a variation and not allowed for in the performance specification) must be endorsed by the project manager.

4.2 The Monitoring Procedure

Environmental monitoring is the continuous evaluation of the status and condition of environmental elements. Its purpose is to detect change that takes place in the environment over time and involves the measuring and recording of physical, social and economic variables associated with development impacts.

Many techniques for environmental monitoring have been proposed, each detailing a specific protocol. Regardless of which technique is used, the ultimate aim is that each environmental management specification be checked by means of a system in which a score may be allocated for:

- Full compliance;
- Satisfactory performance;
- Unsatisfactory performance and
- No action taken.

Completed monitoring reports will be submitted to the project engineer, developer/landowner and the contractor, who will attend to issues. These reports must be kept on file and be made available upon request by any environmental authority requesting such.

All persons employed, the contractor or his sub-contractors, must abide by the requirements of these performance specifications as they apply to the works. Any employees, the contractor or his sub-contractors found to be in breach of any of the environmental specifications, may be ordered to vacate the site forthwith and/or be subject to a disciplinary process.

The order may be given orally or in writing by the ECO. Confirmation of an oral order will be given as soon as practicable, but lack of confirmation in writing must not be a cause for the offender to remain on site, or not be subject to a disciplinary process. Supervisory staff, the contractor or his sub-contractor may not direct any person to undertake any activities which would place such person in contravention of the EMP, legislation and specifications.

The contractor and staff are deemed not to have complied with the performance specifications if:

- There is evidence of wilful or accidental contravention of any specification included in the specification;
- There is evidence of the contractor carrying out activities not permitted in terms of the EMP, contract and / or the specification;
- There is evidence of environmental negligence and / or mismanagement resulting in negative impacts on the environment;
- Has failed to meet with the requirements of the approved schedule.

The contractor and developer/landowner will be informed via ECO monthly reports, as well as by means of direct instruction (if necessary) as to what corrective actions are required in terms of environmental compliance.

Disregard for an instruction, and failure to respond adequately to complaints from the public will be construed as non-compliance. Non-compliance may lead to parties being penalised.

In more serious cases, the ECO may give notice, and halt operations until such a time that the corrective action is taken and the site complies with the performance specifications.

In cases of persistent non-compliance, the contractor or staff may be evicted from site after disciplinary process is followed. Only the developer/landowner may issue such instruction, retaining any costs required to remedy situations perpetuated by environmental negligence, mismanagement and / or non-compliance.

4.3 The Auditing Procedure

Environmental auditing is the process of comparing the impacts predicted with those which have actually occurred during implementation.

An environmental performance audit examines and assesses practices and procedures which, in the event of failure, would cause an environmental impact or result in an environmental risk. During each of the lifecycle phases, various issues will be monitored. The performance audit will ensure that the monitoring was correctly undertaken and that compliance was best achieved.

To these ends the project will be audited versus this EMP for effectiveness. ISO/SANS 19011:2011 auditing standards will be applied.

Audits will be undertaken at completion of the construction phases. Audit reports will be submitted to management, who will attend to all noted issues.

These reports must be kept on record and be made available upon request by the developer/landowner/custodian of the land and any environmental authority or I&AP requesting such.

4.4 Retentions and Penalties

It is recommended that a penalty retention system be combined with the penalty system to both motivate and compel the contractor to adhere to the EMP for the duration of the contract.

In this way incentives may be created to perform (i.e. in the form of the retention amounts that will only be paid to the contractor at the end of the contract), without creating the misunderstanding that adherence to the EMP is optional.

Persistent non-compliance will not only result in the contractor forfeiting any retention amount, but he will also be fined.

Of importance is that the contract specifies exactly how the penalty and retention system will operate, as well as how any funds resultant from retentions and penalties will be utilised.

4.4.1. The Retention System

For this system, a percentage value for each of the sections priced for in the environmental bill of quantities is retained until the full completion of the contract works.

If the monitoring process reveals persistent and/or wilful non-compliance with any aspect of the environmental performance specifications, then the full retention associated with that particular item will be withheld.

The project may then apply these retained funds to rectify the problem on site possibly making use of other or alternate resources at his disposal.

At the end of the contract or action, all remaining environmental retention amounts will be paid out to the contractor or staff pending approval by the ECO, after having confirmed full compliance with the relevant performance and rehabilitation specifications.

4.4.2. Penalty System

A system of penalties will be introduced to reinforce environmentally sensitive and prudent behaviour. The maximum penalties that will be fined per incident that may be enforced are listed below. The penalty amount will be determined (inter alia) by the severity of the offence.

Offence	Amount
Non-compliance of EA or EMP condition	R 5 000.00 (ex VAT) per non-compliant act, per day until compliance is achieved
Casual Litter on site resulting from operation	R250 / offence / day
Disposal of any litter or construction material in non-specified area or by non-compliant means	R5000 / m ³ / per day
Dumping of cement, concrete, fuel or oil in an area or other than that authorised and suitable	R10 000 per offence / day
Failure to use portable / toilets	R100 / observed incident or evidence of human excrement on site

In addition to the above, all costs incurred by the client / developer to remedy any damage will be the responsibility of the offender.

Should the monitoring process reveal acts of persistent and / or wilful non-compliance with the environmental performance specifications, then the contractor or staff member will be fined according to the specified value of that item. The ECO will indicate to which environmental organisation or NGO the fine should be paid. The retention and penalty system should be adhered to.

The payment of penalties into an environmental NPO must be nominated by the ECO and the Head: Environmental & Heritage Management Branch. Proof of payment of penalties must also be sent to the Head: Environmental & Heritage Management Branch.

4.5 Method Statements

Contractors must provide written statements for discussion with the ECO on environmentally sensitive aspects of the contract. Environmentally sensitive aspects include by example excavations, work close to sensitive areas, collection and storage of top soil and vegetation, erosion control, wash water control, waste control, etc.

CHAPTER 5

This section of the report is included in compliance with Section 24N (2) (e) of the National Environmental Management Act 107 of 1998.

5.1. Good Housekeeping

The developer/landowner will ensure the maintenance of “good housekeeping” practices during operations.

This will help avoid several disputes regarding responsibility and will allow for the smooth running of the operation as a whole.

Good housekeeping extends beyond the environmentally sensitive construction methods to include the care for and preservation of the surrounding environment.

5.2 Record Keeping

The developer/landowner will ensure that a filing system, identifying all documentation related to the EMP, is established.

A list of reports likely to be generated during the project is set out below.

All applicable documentation must be included in the environmental filing system catalogue or document retrieval index.

- Approved EMP, authorizations, licenses or permits;
- Final design documents and diagrams issued;
- All communications detailing changes of design/scope that may have environmental implications;
- Daily, weekly and monthly site monitoring reports;
- Complaints register;
- Environmental training manual;
- Environmental training attendance registers;
- Incident and accident reports;
- Emergency preparedness and response plans;
- Copies of all relevant environmental legislation;
- Permits and legal documents as part of emergency preparedness teams e.g. fire teams, etc.;
- Crisis communication manual;
- Disciplinary procedures;
- Monthly site meeting minutes during construction;
- All relevant permits;
- All method statements for all phases of the project.

5.3 Document Control

The developer/landowner will be responsible for establishing a procedure for document control.

The document control procedure must comply with the following requirements:

Documents must be identifiable by organisation, division, function, activity and contact person; Every document must identify the person and their positions, responsible for drafting and compiling the document, for reviewing and recommending approval, and final approval of the document for distribution;

All documents must be dated, provided with a version number and reference number, filed systematically, and retained for a specified period.

The owner will ensure that documents are periodically reviewed and revised where necessary, and that current versions are available at all locations where operations essential to the functioning of the EMP are performed. All documents will be made available to the external auditor.

5.4 Reporting Requirements

All advice and recommendations made by the ECO must with the project engineer/engineers compliance be recorded on site in the site instruction book/ suitable register for his attention.

All spills will need to be documented and reported to DEADP and other relevant authorities.

CHAPTER 6

6.1. Public Communication Protocols

This section of the report is included in compliance with Section 24N (2) (e) of the National Environmental Management Act 107 of 1998.

The developer/landowner must be responsible for regulating public access to information and compliance reporting.

The developer/landowner must respond to third party or public queries and complaints.

The developer/landowner must also be responsible for maintaining the compliance register to record complaints received and action taken.

CHAPTER 7

This section of the report is included in compliance with Section 24 N 2 (d - g) and 3 (a - b) of the National Environmental Management Act 107 of 1998.

Goal for Planning and Design

Overall Goal for Planning and Design: Undertake the planning and design phase of the Extruded Polystyrene (XPS) Plant in a way that:

- Ensures that the design of the Extruded Polystyrene (XPS) Plant Extruded Polystyrene (XPS) Plant responds to the identified environmental constraints and opportunities.
- Ensures that pre-construction activities are undertaken in accordance with all relevant legislative requirements.
- Ensures that adequate regard has been taken of any landowner concerns and that these are appropriately addressed through design and planning (where appropriate).
- Ensures that the best environmental options are selected for the project.
- Enables the Extruded Polystyrene (XPS) Plant construction activities to be undertaken without significant disruption to other land uses in the area.
- In order to meet this goal, the following objectives have been identified, together with necessary actions and monitoring requirements.

OBJECTIVE PD1: PRE-CONDITIONS

The following pre-conditions must be fully met before any construction activities may commence.

MM Risk have been appointed to develop a comprehensive emergency plan. This emergency plan will also include procedures for use in the event of a nuclear emergency for all phases of construction and operation of the proposed plant. This plan must be submitted to the City of Cape Town for approval prior to the commencement of construction.

The ECO must inform the Head: Environmental & Heritage Management Branch of commencement of site activities and construction.

A site meeting between the contractors and the representatives of the developer must take place at least 5 days prior to commencement of construction work to:

- Check required toilets and fire-fighting facilities to be in place;
- Discuss and agree restricted access to construction site;
- Sign the Declaration of Understanding (Contractors);
- Discuss and agree communication channels including contact details;
- Discuss and agree areas of responsibility.

Minutes of this site meeting must be kept, and are to be distributed to all parties.

The following equipment must be on every micro or sub site before any construction work is due to start:

- Sufficient and suitable toilet facilities.
- Sufficient refuse bins, which are weather and wind proof, with proper lids.
- 1 x type ABC (all purpose) 12.5 kg fire extinguisher.

Five (5) mature trees will be lost as a result of the development. It is recommended that these be replaced / replanted if feasible.

OBJECTIVE PD2: LAYOUT PLAN CONTROLS

The contractor must ensure that a copy of the signed approved layout plan is available at the office on site at all times for inspection by the developer or his representative(s). Any variation to the approved layout plan must be submitted to the developer for signed approval and may only be implemented once the approved variation is available to the contractor and available on site at the office. The variation of changes to the layout must be approved by the competent authority as per the EA conditions. This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE PD3: ADVERTISING

The contractors may place no advertising material on the property unless prior formal written permission has been obtained from the landowner.

This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE PD4: METHOD STATEMENTS

To ensure all construction activities are undertaken with the appropriate level of environmental awareness to minimise environmental risk, in line with the specifications of the EMPr.

The environmental specifications are required to be underpinned by a series of Method Statements, within which the contractors and service providers are required to outline how any identified environmental risks will practically be mitigated and managed for the duration of the contract, and how specifications within this EMPr will be met. That is, the contractor will be required to describe how specified requirements will be achieved through the submission of written method statements to the site manager.

A method statement is defined as “a written submission by the contractor in response to the environmental specification or a request by the site manager, setting out the plant, materials, labour and method the contractor proposes using to conduct an activity, in such detail that the site manager is able to assess whether the contractor’s proposal is in accordance with the specifications and/or will produce results in accordance with the specifications”.

The method statement must cover applicable details with regard to:

- Details of the responsible person/s
- Construction procedures
- Materials and equipment to be used
- Getting the equipment to and from site
- How the equipment/material will be moved while on-site
- How and where material will be stored
- The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur
- Timing and location of activities
- Compliance/non-compliance with the specifications
- Any other information deemed necessary by the site manager

Method statements must be compiled for all activities which affect any aspect of the environment and should be applied consistently to all activities.

Specific areas to be addressed in the method statement pre, during and post construction (where applicable) include:

Soil management:

- Excavations and backfilling procedure.

Water Management:

- Stipulate norms and standards for water supply and usage (i.e.: comply strictly to restrictions).
- Stipulate the storm water management procedures recommended in the storm water management method statement.

Fire Prevention and Management:

- Fire management protocols and procedures to be put in place on site in accordance with relevant legislature.

Environmental Reporting:

- Incident and accident reporting protocol.

Solid Waste Management:

- Description of the waste storage facilities, management and collection of waste process, recycle, re-use and removal process and procedure.

Liquid Waste Management:

- The design, establish, maintain and operate suitable pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into rivers, streams or existing drainage systems.

Noise Pollution:

- Describe necessary measures to ensure that noise from construction activities is maintained within lawfully acceptable levels.

Hazardous Substance Storage:

- Ensure compliance with all national, regional and local legislation with regard to the storage of oils, fuels, lubricants, solvents, wood treatments, bitumen, cement, pesticides and any other harmful and hazardous substances and materials (South African National Standards apply).
- Lists of all potentially hazardous substances to be used. Appropriate handling, storage and disposal procedures.
- Prevention protocol of accidental contamination of soil at storage and handling areas. All storage areas, (i.e.: for harmful substances appropriately banded with a suitable collection point for accidental spills must be implemented and drip trays underneath dispensing mechanisms including leaking engines/machinery).

The contractor may not commence the activity covered by the method statement until it has been approved by the site manager, except in the case of emergency activities and then only with the consent of the site manager. Approval of the method statement will not absolve the contractor from their obligations or responsibilities in terms of their contract.

Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved.

OBJECTIVE PD5: ENSURE THE DESIGN OF THE EXTRUDED POLYSTYRENE (XPS) PLANT RESPONDS TO THE IDENTIFIED ENVIRONMENTAL CONSTRAINTS AND OPPORTUNITIES

Fourteen (14) days written notice must be given to the Department that the activity will commence. The notification must include a date on which the activity will commence as well as the reference number. ECO to be appointed prior to the commencement of any authorised activities. Once appointed the name and contact details of the ECO must be submitted to the DEA&DP. The ECO must inform the Head: Environmental & Heritage Management Branch of commencement of site activities and construction. Monthly ECO Audit Reports must be submitted to the Head: Environmental & Heritage Management Branch.

OBJECTIVE PD6: ENSURE EFFECTIVE COMMUNICATION MECHANISMS WITH THE VARIOUS STAKEHOLDERS

On-going communication with affected and surrounding landowners and key departments is important to maintain during the construction and operational phases of the Extruded Polystyrene (XPS) Plant. Any issues and concerns raised should be addressed as far as possible in as short a timeframe as possible.

Project Component/s	Extruded Polystyrene (XPS) Plant.
Potential Impact	Impacts on affected and surrounding landowners and land uses.
Activities/Risk Sources	Activities associated with facility construction and operation.
Mitigation: Target/Objective	Effective communication with affected and surrounding landowners. Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible.

Mitigation: Action/Control	Responsibility	Timeframe
Compile and implement a grievance mechanism procedure for the public to be implemented during both the construction and operational phases of the facility. This procedure must include details of the contact person who will be receiving issues raised by I&APs, and the process that will be followed to address issues.	Developer	Pre-construction, construction and operational phase

Performance Indicator	Effective communication procedures in place.
Monitoring	An incident must be reported in the site book and monitored by the ECO.

CONSTRUCTION CIVIL CONTRACTOR

Goals for Construction Phase

Overall Goal for Construction:

Undertake the construction of the Extruded Polystyrene (XPS) Plant infrastructure in a way that:

- Ensures that construction activities are properly managed in respect of environmental aspects and impacts;
- Enables construction activities to be undertaken without significant disruption to other land uses in the area, in particular concerning noise impacts, traffic and road use, and effects on local residents;
- Minimises the impact on the surrounding area; and
- Minimises possible health impacts.

Objectives

In order to meet this goal, the following objectives have been identified, together with the necessary actions and monitoring requirements.

OBJECTIVE C1: WORKING HOURS

Civil & Construction Sites	
Mondays to Fridays	06h00 – 19h00
Saturdays & Public Holidays	06h00 – 17h00

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
Potential Impact	Impacts on affected and surrounding landowners and land uses such as noise impacts.
Activities/Risk Sources	Activities associated with facility construction that creates disturbing noises.
Mitigation: Target/Objective	Effective communication with affected and surrounding landowners. Addressing of any issues and concerns raised as far as possible in as short a timeframe as possible.

Mitigation: Action/Control	Responsibility	Timeframe
Contractors may only be present on the site during the public time hours.	Developer and contractor	Construction phase

Performance Indicator	Effective communication and procedures in place.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C2: SAFETY

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
Potential Impact	Impacts on affected and surrounding landowners and land uses such as crime, violence and incidents.
Activities/Risk Sources	The proposed development may result in an increase in crime levels in the surrounding community.
Mitigation: Target/Objective	To protect all involved from incidents and injury.

Mitigation: Action/Control	Responsibility	Timeframe
Telephone numbers of emergency services, including the local firefighting services, must be posted conspicuously in the contractor's office and near the telephone. No firearms are permitted on the construction site, other than those authorised by the developer for the property security service provider if needed. Notices should be displayed at all public entrances to the property, warning visitors that they are entering a construction site.	Contractor	Construction phase

Performance Indicator	Effective communication and procedures in place.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C3: SPEED LIMIT

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
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Potential Impact	Impacts on affected and surrounding landowners and land uses such as noise and traffic accidents.
Activities/Risk Sources	Activities associated with facility construction such as transport of construction material, rubble and contractors.
Mitigation: Target/Objective	To protect all involved from incidents and injury and keep dust and noise impacts to a minimum.

Mitigation: Action/Control	Responsibility	Timeframe
For security and safety reasons the speed limit on the property for all contractors' vehicles is 30 km per hour. The contractor is responsible for ensuring that all his employees, sub-contractors and delivery vehicles adhere to this rule.	Contractor	Construction phase

Performance Indicator	Effective communication and procedures in place.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C4: CONTRACTOR'S CAMP

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
Potential Impact	Impacts on affected and surrounding landowners and land uses such as pollution and litter as well as visual impacts.
Activities/Risk Sources	Setting up and operation of the contractor's camp.
Mitigation: Target/Objective	Construction camp must be neatly fenced and construction site must be neat and tidy.

Mitigation: Action/Control	Responsibility	Timeframe
The contractor's camp will be indicated by and to landowner management and the ECO on the site. The final location of the contractor's camp will be authorized by the ECO and landowner. Construction camp must be neatly fenced and construction site must be neat and tidy.	Developer / Contractor	Construction phase

Performance Indicator	Contractor's camp is neat and tidy and fenced.
Monitoring	The ECO in conjunction with the landowner will approve construction camp area. This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C5: DELIVERIES TO CONTRACTORS

Project Component/s	Access roads.
Potential Impact	Impacts on affected and surrounding landowners and land uses such as dust, noise, increased traffic and traffic accidents.
Activities/Risk Sources	Vehicles on site transporting material to contractors.
Mitigation: Target/Objective	To protect and mitigate impacts on the environment and surrounding land uses.

Mitigation: Action/Control	Responsibility	Timeframe
Contractors will at all times be responsible for compliance by their delivery service providers as engaged. Delivery times will be limited to working times as defined in this document. Contractors have the responsibility of advising the property security staff of deliveries expected and to be executed. Contractors shall further ensure that drivers of service	Contractor	Construction phase

providers are informed of all procedures and restrictions e.g. which access road to use, speed limits and maximum allowed vehicle mass etc., as applicable before their first visit to site. Washing of service provider delivery vehicles and equipment will not be allowed on the property and must be carried out elsewhere.		
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Performance Indicator	Site is secure and there is no unauthorised entry. No members of the public injured.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C6: ALIEN/INVASIVE PLANTS

Not applicable.

OBJECTIVE C7: STORM WATER MANAGEMENT

Project Component/s	Storm water infrastructure; Access roads.
Potential Impact	Potential pollution of water resources.
Activities/Risk Sources	Activities associated with facility construction.
Mitigation: Target/Objective	To manage storm water effectively and prevent pollution and erosion.

Mitigation: Action/Control	Responsibility	Timeframe
Ensure only storm water enters the storm water system.	Contractor	Construction phase

Performance Indicator	No signs of storm water pollution or accumulation that will result in a nuisance.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C8: ARCHAEOLOGY AND PALAEOLOGY MANAGEMENT

Project Component/s	Excavation / Civils if required
Potential Impact	The loss of cultural or heritage resources.
Activities/Risk Sources	Activities associated with facility construction such as excavation.
Mitigation: Target/Objective	To protect and mitigate impacts on the areas heritage.

Mitigation: Action/Control	Responsibility	Timeframe
During excavation should any heritage or fossil remains be exposed during any excavation or related activities, these must immediately be reported to the provincial heritage resource authority of the Western Cape, Heritage Western Cape (in terms of the National Heritage Resources Act, 1999 (Act No.25 of 1999) via the ECO. Heritage remains uncovered or disturbed during earthworks must not be disturbed until inspection and verified by the professional.	Contractor	Construction phase

Performance Indicator	Protection of heritage resources
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C9: SERVICES

Project Component/s	Extruded Polystyrene (XPS) Plant; Associated services infrastructure; Access roads.
Potential Impact	Damage/loss of services infrastructure or supply.
Activities/Risk Sources	Activities associated with facility construction.
Mitigation: Target/Objective	To protect and mitigate impacts on the surrounding land uses.

Mitigation: Action/Control	Responsibility	Timeframe
Care and due cognisance must be taken of existing services, service routes and services restrictions. The developer and landowners shall not be liable for damages, expenses or costs incurred for any interruption in supply, variation, frequency, or failure of any utility provider to supply service.	Contractor	Construction phase

Performance Indicator	Protection of existing services and infrastructure.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C10: ROADS

Project Component/s	Access roads.
Potential Impact	Increased traffic/congestion. Construction vehicles pose a potential risk to other road uses and the natural environment if they do not use designated routes.
Activities/Risk Sources	Deliveries and construction vehicle travelling to site and on site.
Mitigation: Target/Objective	Designation of specific routes for construction vehicles to reduce impact on the environment and other road users.

Mitigation: Action/Control	Responsibility	Timeframe
Only existing access routes to the property will be used during construction work. The contractor shall ensure that access to construction sites and associated infrastructure and equipment is designated off-limits to the public at all times during construction.	Contractor	Construction phase

Performance Indicator	To minimise the impacts on road users.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C11: ANTI-EROSION MEASURES

Not applicable.

OBJECTIVE C12: CONSTRUCTION MATERIAL

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
Potential Impact	Visual impacts and causing a nuisance to surrounding landowners/residents.
Activities/Risk Sources	Activities associated with facility construction such as storage of construction material.
Mitigation: Target/Objective	Reduce the visual impact or nuisance to the surrounding landowners/residents.

Mitigation: Action/Control	Responsibility	Timeframe
Construction material will be stored neatly on the construction site. Special permission may be obtained from the ECO/ER to store material on suitable substitute or ancillary locations should the need arise, and as communicated by the project engineer.	Contractor	Construction phase

Performance Indicator	To minimise the impact on the surround land uses and environment.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C13: FIRES

Project Component/s	Extruded Polystyrene (XPS) Plant; Access roads.
Potential Impact	Uncontrolled fire on/off site, resulting in damage to the environment, property, injuries/death to personnel on site, or injuries/death to the public.
Activities/Risk Sources	Activities associated with facility construction.
Mitigation: Target/Objective	To protect and mitigate the safety of people, property, and the environment on and off site by preventing uncontrolled fires.

Mitigation: Action/Control	Responsibility	Timeframe
No open fires will be allowed on site and adequate firefighting equipment should be available on site in good working order at all times as prescribed by the fire management protocols.	Contractor	Construction phase

Performance Indicator	No fire occurred to damage the surrounding environment and land uses and management actions are in place should a fire occur.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C14: PESTICIDES

Project Component/s	Extruded Polystyrene (XPS) Plant.
Potential Impact	Adjacent land/property contaminated by the application of pesticides.
Activities/Risk Sources	Activities associated with facility construction.
Mitigation: Target/Objective	To protect and mitigate impacts on the environment and surrounding land uses.

Mitigation: Action/Control	Responsibility	Timeframe
All personnel working with any pesticide must be registered and comply with the requirements set in these registrations. All equipment associated to pesticides must be maintained in accordance to the set standards. The disposal of all redundant and empty containers of pesticides must be controlled and disposed of at a waste management facility licensed under the National Environmental Management: Waste Act.	Contractor	Construction phase

Performance Indicator	Pesticides use is controlled to prevent impacts on the environment and surrounded land uses.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C15: AN EFFECTIVE MONITORING SYSTEM TO DETECT ANY LEAKAGE OR SPILLAGE OF ALL HAZARDOUS SUBSTANCES DURING THEIR TRANSPORT, HANDLING USAGE AND STORAGE. THIS MUST INCLUDE PRECAUTIONARY MEASURES TO LIMIT THE POSSIBILITY OF OIL AND OTHER TOXIC LIQUIDS FROM ENTERING THE SOIL OR STORM WATER SYSTEMS

Project Component/s	Extruded Polystyrene (XPS) Plant.
Potential Impact	Contamination of soil, storm water and ground water resources by hazardous substances.
Activities/Risk Sources	The handling, storage and use of hazardous substances.
Mitigation: Target/Objective	Prevention and mitigation of the environment contaminated as a result of exposure to hazardous substances.

Mitigation: Action/Control	Responsibility	Timeframe
The EA holder will do monthly inspections and report and monitor compliance with the management actions included in the EMPr and EA conditions. These monitoring and reporting requirements are recorded in several sections of the EMPr. Monitoring will focus on signs of spillages and procedures during handling and storage of dangerous goods as described in the EMPr. The section on storage and handling of dangerous goods in the EMPr will be enforced.	Contractor	Construction phase

Performance Indicator	Impacts on storm water minimized and mitigated.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C16: DIESEL FUEL AND LUBRICANT HANDLING PROGRAMME

Project Component/s	Extruded Polystyrene (XPS) Plant.
Potential Impact	Contamination of soil, storm and ground water resources as a result of an oil/diesel/lubricant spill/leak.
Activities/Risk Sources	Diesel fuel and lubricant use and storage.
Mitigation: Target/Objective	To protect and mitigate impacts of contaminants on the environment and hydrological features.

Mitigation: Action/Control	Responsibility	Timeframe
<p>Servicing of construction vehicles and machinery to take place of site. All vehicles must be in a good condition with no leakages leading to possible contamination of soil or water supplies. The following conditions related to the temporary fuel tanks must be implemented:</p> <p>The fuel tanks must be designed and installed in accordance with relevant Oil Industry standards and SANS codes where applicable for the aboveground storage tanks. The tanks must be located within a bund (110 % of the tanks capacity) in order to contain potential spills.</p> <p>During fuel tanker delivery, the tanker driver must be present at all times during product offloading. Should an incident occur the supply vehicle emergency cut-off switch must be activated to immediately stop fuel delivery. Flexible hoses with dry-break couplings and emergency isolation must be used. All spillage incidences and actions taken consequent thereto must be reported to the ECO and</p>	Contractor	Construction phase

recorded in the site register.

All fuel and flammable liquids should be stored under secure and fenced conditions and in a bunded site with the volume of the bunding capable of holding 110% of the liquid. Double bunded tanks, with leak monitoring sensors should be used.

The applicant must ensure that effective stock inventory monitoring and regular auditing take place for the early identification of possible leaks.

The requirements of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993), must be adhered to. Within three months of the tanks ceasing to be used the tanks must be removed at the expense of the applicant, and the site, including all associated infrastructure must be rehabilitated to the satisfaction of the relevant authority.

Refuelling:

Refuelling of equipment must be conducted from the bunded fuel tank and pump at the contractor's camp. Fuel tanks must be bunded and supplied with a concrete apron. The concreted refuelling apron will be constructed with a drain along its extremities to collect any diesel contaminated run-off and channel it to the oil trap where separated oil will be collected and disposed of in the oil recycling container and process. Any spills on the concrete apron or floor below the tank are to be treated with OT8 or Spillsolve or equivalent as per the product instructions.

A 500 litre drawn trailer to convey diesel to the equipment for re-fuelling may also be used. Such trailer will be drawn by a specified vehicle and driver, with alternate nominated as approved by the Project Engineer. Such tow vehicle may travel at 20kms per hour maximum at any time, be clearly identifiable as such, and may only tow the diesel cart should the pre requisite drip trays and emergency equipment be on the vehicle at the time. In situ refuelling activity may only take place during a standard specified daily time slot as displayed in the construction office, unless specific per day permission has been given to refuel at any other time by the ECO. This must be pre-recorded in the site record book. Staff will require instruction in the identification of diesel and oil leaks and the use of Spillsolve (or equivalent) products.

On-site emergency repairs:

Only small mobile plant and emergency repairs are to take place on site. These will require the provision of drip trays and funnels to ensure that no oil or fuel leakages occur onto the ground. Should such spill take place, then the oil saturated soil is to be placed in suitable containers and disposed of at a hazardous waste disposal site. Any contamination of soil is to be treated with Spillsolve or similar product. Contaminated water as a result of an oil or fuel spillage on the area should similarly be treated in appropriate way, and the polluted water should not be specifically removed and not allowed to merge with run-off water collected in the trap collecting all run offs from the

<p>slab.</p> <p>Collection of contaminated spares and waste oils: Contaminated spares, oil filters, gaskets, water, etc. will be collected in separate holders at the designated storage facility for disposal at a licensed H:h site. Staff will require instruction in:</p> <ul style="list-style-type: none"> • Deleterious effects of oil / fuel on the environment • Identification of oil leaks • Handling of oil / fuel leaks into soil • Location and method in storage of contaminated spares • Fire prevention and emergency drills in case of an accident 		
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Performance Indicator	Ensure that no spillages occur and if it occurs that it is handled and cleaned up.
Monitoring	This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.

OBJECTIVE C17: APPROPRIATE HANDLING AND STORAGE OF CHEMICALS, HAZARDOUS SUBSTANCES AND WASTE (WASTE MANAGEMENT PLAN)

The construction phase will involve the storage and handling of a variety of chemicals including adhesives, abrasives, oils and lubricants, paints and solvents. The main wastes expected to be generated by the construction of the facility will include will include general solid waste and liquid waste, and may include hazardous waste.

Project Component/s	Construction areas; Storage areas.
Potential Impact	<ul style="list-style-type: none"> • Release of contaminated water from contact with spilled chemicals. • Generation of contaminated wastes from used chemical containers. • Inefficient use of resources resulting in excessive waste generation. • Litter or contamination of the site or water through poor waste management practices. • Pollution of water and soil resources.
Activities/Risk Sources	<ul style="list-style-type: none"> • Vehicles associated with site preparation and earthworks. • Packaging and other construction wastes. • Hydrocarbon use and storage. • Spoil material from excavation.
Mitigation: Target/Objective	<ul style="list-style-type: none"> • To ensure that the storage and handling of chemicals and hydrocarbons on-site does not cause pollution to the environment or harm to persons. • Good housekeeping of chemicals and other materials on site for the duration of the construction will minimize, avoid any spillages, or other incidents. All spillages should be reported immediately. • To ensure that the storage and maintenance of machinery on-site does not cause pollution of the environment or harm to persons.

	<ul style="list-style-type: none"> • To comply with waste management guidelines. • To minimise production of waste. • To ensure appropriate waste storage and disposal. • To avoid environmental harm from waste disposal.
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Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> • Implement a site-specific waste management plan during the construction phase. • The applicant ensure that the inert waste is separated from other hazardous construction materials. • All hazardous waste should be treated and or disposed of in the correct manner. • A spill kit must be made available on-site for the clean-up of spills and leaks of contaminants. • Corrective action must be undertaken immediately if a complaint is received, or potential/actual leak or spill of polluting substance identified. This includes stopping the contaminant from further escaping, cleaning up the affected environment as much as practically possible and implementing preventive measures. • Implement an effective monitoring system to detect any leakage or spillage of all hazardous substances during their transportation, handling, use and storage. This must include precautionary measures to limit the possibility of oil and other toxic liquids from entering the soil or storm water systems. • Leakage of fuels must be avoided at all times and if spillage occurs, it must be remediated immediately. • In the event of a major spill or leak of contaminants, the relevant administering authority must be immediately notified as per the notification of emergencies/incidents. • Spilled cement, fly ash and concrete must be cleaned up as soon as possible and disposed of at a suitably licensed waste disposal site. • Any contaminated/polluted soil removed from the site must be disposed of at a licensed hazardous waste disposal facility. • All stored fuels to be maintained within a sealed bund and on a sealed surface. The bund must be at least 110% of the volume of the total containers. • Adjacent fuelling areas situated around fuel tanks must be provided with an impervious layer or drip trays must be used during refuelling. • Areas around fuel tanks must be appropriately bunded or contained in an appropriate manner as per the requirements of SABS 089:1999 Part 1. • Fuel storage areas must be inspected regularly to ensure bund stability, integrity, and function. • Oily water from bunds at the substations must be removed from site by licensed contractors. • The storage of flammable and combustible liquids such as oils will be in designated areas which are appropriately bunded, and stored in compliance with MSDS files. • Ensure all material data sheets of chemicals utilized on site is kept in the site office. • Any storage and disposal permits/approvals which may be required must be obtained, and the conditions attached to such permits and approvals will be compiled with and copies kept on site in the environmental file. • Transport of all hazardous substances must be in accordance with the relevant legislation and regulations. 	Contractor	Construction phase

<ul style="list-style-type: none"> • Where practically possible, construction and general wastes on-site must be reused or recycled. Bins and skips must be available on-site for collection, separation, and storage of waste streams (such as wood, metals, general refuse etc.). • Disposal of waste must be in accordance with relevant legislative requirements, including the use of licensed contractors and disposal at appropriately licensed waste disposal sites. • Hydrocarbon waste must be contained and stored in sealed containers within an appropriately bunded area. • Waste and surplus dangerous goods must be kept to a minimum and must be transported by approved waste transporters to sites designated for their disposal and copies of the safe disposal slips must be kept in the environment file on site. • Documentation (waste manifest) must be maintained detailing the quantity, nature, and fate of any regulated waste. Waste disposal records must be available for review at any time. • An incident/complaints register must be established and maintained on-site. • An integrated waste management approach that is based on waste minimisation must be used and must incorporate reduction, recycling, re-use and disposal where appropriate • Dispose of all solid waste collected at an appropriately registered waste disposal site. Waste disposal shall be in accordance with all relevant legislation and under no circumstances may waste be burnt on site. • It must be ensured that only accredited waste service providers are involved in the transportation of waste material. 		
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<p>Performance Indicator</p>	<ul style="list-style-type: none"> • Limited chemical spills outside of designated storage areas. • No water or soil contamination by spills. • No complaints received regarding waste on site or indiscriminate dumping. • Provision of all appropriate waste manifests for all waste streams. • Little to no waste littered on site. • Little to no windblown litter evident.
<p>Monitoring</p>	<ul style="list-style-type: none"> • Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase. • A complaints register must be maintained, in which any complaints from the community will be logged. • Complaints will be investigated and, if appropriate, acted upon • Observation and supervision of waste management practices throughout construction phase. • Waste collection will be monitored on a regular basis. • Waste documentation completed. <ul style="list-style-type: none"> ○ Certificates of safe disposal ○ Accreditation of waste transporter ○ Accreditation of waste facility where waste is taken • An incident reporting system will be used to record non-conformances to the EMPr. <p>This will be monitored by the ECO during site visits and recorded, reported and proof included in the audit report to be submitted once construction is completed.</p>

OBJECTIVE C18: EFFECTIVE MANAGEMENT OF CONCRETE BATCHING AREA

Project Component/s	Concrete batching area.
Potential Impact	<ul style="list-style-type: none"> • Dust emissions. • Release of contaminated water, pollution of storm water resources. • Generation of contaminated wastes from used chemical containers. • Inefficient use of resources resulting in excessive waste generation.
Activities/Risk Sources	<ul style="list-style-type: none"> • Operation of the batching area. • Packaging and other construction wastes. • Hydrocarbon use and storage. • Spoil material from excavation.
Mitigation: Target/Objective	To ensure that the operation of the batching area does not cause pollution to the environment or harm to persons.

Mitigation: Action/Control	Responsibility	Timeframe
<ul style="list-style-type: none"> • Concrete mixing must be conducted on an impermeable surface that is bunded. • Concrete batching plants to be sited such that impacts on the environment or the amenity of the local community from noise, odour or polluting emissions are minimised. • The concrete batching plant site should demonstrate good maintenance practices, including regular sweeping to prevent dust build-up. • Dust mitigation is to be strictly enforced at all times to prevent dust emissions to atmosphere and the surrounding environment and therefore, the conditions stipulated in the Notional Dust Control Regulations (GN. 36974) dated 1 November 2013 must be adhered to at all times during the development process. • In addition to the NEMA, the site must at all times comply with all the provisions of the City of Cape Town Air Quality Management By-law, 2016, but specifically in terms of Dust and Nuisance emissions is listed in Chapter 9 of the by-law. • The use of waterless methods or non-potable water is encouraged for dust suppression where required. • The site should be designed and constructed such that clean storm water, including roof runoff, is diverted away from contaminated areas and directed to the storm water discharge system. • Any liquids stored on site, including admixtures, fuels and lubricants, should be stored in accordance with applicable legislation. • Contaminated storm water and process wastewater should be captured and recycled where possible. • Areas where spills of oils and chemicals may occur should be equipped with easily accessible spill control kits to assist in prompt and effective spill control. • Ensure that all practicable steps are taken to minimise the adverse effect that noise emissions. This responsibility includes not only the noise emitted from the plant and equipment but also associated noise sources, such as radios, loudspeakers and alarms. • Where possible, waste concrete should be used for construction purposes at the batching area or project site. 	Contractor	Construction phase

Performance Indicator	<ul style="list-style-type: none"> • No complaints regarding dust or contamination • No water or soil contamination by chemical spills/concrete
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	<ul style="list-style-type: none"> No complaints received regarding waste on site or indiscriminate dumping
Monitoring	<p>Observation and supervision of chemical storage and handling practices and vehicle maintenance throughout construction phase.</p> <p>A complaints register will be maintained, in which any complaints from the community will be logged. Complaints will be investigated and, if appropriate, acted upon. All registers should be kept on site and must be made available to the department on request.</p> <p>An incident reporting system will be used to record non-conformances to the EMP.</p> <p>Developer or appointed ECO must monitor indicators listed above to ensure that they have been met for the construction phase.</p>

OPERATIONAL PHASE

OPERATIONAL ENVIRONMENTAL MANAGEMENT PROGRAMME

This following section defines the management programme for each of the identified goals during the operational phase. The programme is presented in the form of a table, which includes the components described. This programme consists of the following components:

Goals

Over-arching environmental goals for the management phase.

Objectives

The objectives are in place in order to meet these goals. These take into account the findings from existing studies and monitoring programmes.

Management Actions

The actions needed to achieve the objectives, taking into consideration factors such as responsibility, methods, frequency, resources required and prioritisation.

Monitoring

Key actions to verify that objectives are being achieved, taking into consideration responsibility, frequency, methods, and reporting.

Criteria/Targets

The criteria or targets indicate the efficacy of the management programme. The targets should be readily measurable, understandable to the layperson, cost-effective to monitor, and meet legal requirements.

Remedial Actions

Specifies actions needed to be taken if the targets are not met; or if there is an unforeseen event.

Goals

The following 7 are specified goals:

Goal 1: Waste Management

Goal 2: Pollution Control and Emissions Management

Goal 3: Storm Water Management

Goal 4: Fire Management

Goal 5: Safety, Security and Emergency Procedures (including Fences)

Goal 6: Noise Management

Goal 7: Storage and Handling of Dangerous Goods

Goal 8: Storage Tank Management

Goal 1: Waste Management

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<p><i>Ensure allocation of sufficient resources for on-going Integrated Waste Management e.g. staff, equipment.</i></p>	<p>Pollution and odours</p>	<ol style="list-style-type: none"> 1. No solid waste may be incinerated on the property. 2. All vehicles transporting waste must be closed to avoid possible pollution of waste on transport routes. 3. It must be ensured that only accredited waste service providers are involved in the transportation of waste material. 4. The applicant is also required to register as a waste generator before activities can commence on site. 5. Waste needs to be sorted and recycled where necessary. 6. Domestic waste not suitable for compost or bio electricity generation needs to be stored in skips for transport to the Local Authorities registered Landfill site. 7. An integrated waste management approach must be implemented on site, based on waste minimisation, reduction, recycling, re-use and disposal where possible. 8. Certificates of safe disposal must be retained for all waste removed from site. 	<p>Audits of operations vs EMP to identify those requirements that are not being met.</p> <p>Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of in house maintenance staff</p>	<p>If pollution on site is detected immediate actions must be taken to contain the pollution. Depending on type and extent of pollution occurred specialists may be contacted to provide specific recommendations. An incident report to be compiled and sent to municipal and governmental authorities.</p>

Waste Management

Waste is defined as any matter for which the current user has no further purpose, or any matter, gaseous, liquid, or solid or any combination thereof originating from any residential, commercial or industrial use, which has been discarded, accumulated, or stored.

It further is worth noting that on average 80% of waste management costs accrue to transport.

Principally three types of waste occur-

- | | |
|-----------------------------------|---|
| - Gaseous | Open fires |
| - High moisture (effluent) | sewerage/waste water/ petroleum products |
| - Low moisture (solid/semi solid) | glass/plastic/ cardboard/ paper/ domestic/ chemical |

Some potential consequences-

- Salination of ground/surface/ river water.
- Eutrophication (nutrient enrichment) of natural areas.
- Microbiological contamination of natural areas.
- Sediment & silt migration inflows.
- Harmful inorganic/organic compounds introduction into soil.

Chemical residues and empty containers are required as per purchase contract to be removed ex site by the original supplier. The supplier is asked to further declare that such waste is disposed of within accepted Waste Management Programs standards.

Identified Waste Streams:

Components-

Sewerage (black water)
Sewerage (grey water)
Wet refuse
Dry refuse
Bottles & glass
Tins/cans
Plastic/polypropylene
Garden refuse
General other waste

Integrated Waste Management Strategy:

Waste Avoidance-

Objective is to promote the concept of minimisation in the generation of any waste in all activities and sites.

Waste Reduction-

To promote the reduction of all waste by ensuring that nothing that can be decomposed is disposed of to waste as opposed to recycling.

Waste Recycling-

Re-using waste or selling waste to recycling companies as far as and if possible to prevent re-usable waste from going to municipal landfill site.

Waste Disposal-

To store, dispose or treat all waste that cannot be avoided, recycled, or composted at licensed facilities within regular operational and environmental monitoring and always in accordance with regulatory requirements.

Storm water Pollution Management-

Storm water and effluent systems must be separated by cut-off trenches to ensure that storm water is not contaminated by effluent water.

Goal 2: Pollution Control and Emissions Management

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<p><i>Ensure allocation of sufficient resources for on-going Integrated Waste and pollution control Management e.g. staff, equipment, budget.</i></p>	<p>Pollution, emissions and health.</p>	<ol style="list-style-type: none"> 1. Waste to be stored on the property appropriate containers or facilities as provided by the municipality. 2. All vehicles transporting waste must be closed to avoid pollution of transport routes. 3. All bunded areas must be checked once a week to ensure that they are kept clean and free of rain water. 4. Rain water must be removed from the bunded areas and disposed of in accordance with the legislation (if contaminated it must be disposed of as hazardous waste). 5. All bunds must be maintained in accordance with the relevant SANS standard. 6. Monitoring of the levels of all chemicals in the atmosphere must be tested in accordance with the Hazardous Chemical Substance Regulations. 7. A complaints register must be maintained and all complaints must be investigated and all complainants responded to. 8. Once off ambient air quality monitoring (ambient VOCs concentrations) at 3 selected 	<p>Audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of in house maintenance staff</p>	<p>If pollution on site is detected immediate action must be taken to contain the pollution. Depending on type and extent of pollution occurred specialists may be contacted to provide specific recommendations. An incident report to be compiled and sent to municipal and governmental authorities.</p>

		<p>locations within the the building where extrusion takes place. This must be done within the first 3 months of operations. These results must be submitted to the relevant air quality officer at the City of Cape Town.</p> <p>9. The ventilating systems/pipes from above ground storage tanks must be positioned in such a manner so that any fumes generated/released do not negatively impact on the air quality of the occupants on-site or of neighboring properties and their occupants.</p>			
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Goal 3: Storm Water Management Measures

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<p>1] <i>Ensure allocation of sufficient resources for on-going Water Quality and Storm Water Management e.g. staff, equipment, budget</i></p>	<p>Pollution and illegal quality of waste water discharge.</p>	<ol style="list-style-type: none"> 1. Ensure no pollution of storm water takes place as a result of any activities on the site. 2. Ensure that no water other than storm water be discharged in the storm water system. 3. The storm water channels must be monitored and maintained on a regular basis. 4. All waste within the storm water channels must be 	<p>Audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of in house maintenance staff</p>	<p>If pollution or erosion is detected immediate action must be taken to contain the pollution or erosion. Depending on type and extent of pollution or erosion occurred specialists may be contacted to provide specific recommendations. An incident report to be compiled and sent to municipal and</p>

		<p>removed on a weekly base.</p> <ol style="list-style-type: none"> 5. A spill kit must be available on site, to be used immediately should a spill occur. 6. Training will be provided to maintenance staff. 7. The storm water grid/gully inlet will be cleaned every third month. 8. All sand traps and oil traps will be cleaned monthly. 9. Visual inspections will be done monthly. 10. Drip trays must be used for refuelling of liquid tanks. 			governmental authorities.
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Goal 4: Fire Management

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<p><i>Ensure allocations of sufficient resources e.g. staff, equipment, Budget,) for Ongoing fire management</i></p>	<p>Pollution, fire, damage to property and health risks.</p>	<ol style="list-style-type: none"> 1. Sufficient Fire Fighting equipment to be on site. 2. Yearly testing and servicing of firefighting equipment. 3. Testing of emergency evacuation plan in accordance with legal requirements. 	<p>Yearly audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of staff</p>	<p>To be determined when required</p>

Fire Management

Such legislation applies to the open countryside beyond urban limits and puts in place a range of legal requirements.

The responsibilities of people who own or control land

The landowner on whose land a fire may start, or from whose land it may spread across boundaries, must have in place:

- Have available such equipment, protective clothing and trained personnel required to extinguishing such fire as may occur.
- Take all reasonable steps to notify the fire chief of the local authority should a fire break out.
- Do everything in their reasonable power to stop the spread of the fire.

The Act also requires that should the owner be absent, a known and identified other person responsible needs to be present on or near this land to:

- Extinguish a fire if one breaks out, or assist or instruct others to do so
- Take all reasonable steps to alert the neighbours and Fire Chief.
- The owner may appoint an agent to act on his or her behalf to perform these duties.

Goal 5: Safety and Security Measures and Emergency Procedures

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<p><i>Ensure allocation of sufficient resources for on-going safety, security and emergency procedures. e.g. staff, equipment, budget</i></p>	<p>Pollution, fire, security and safety risks.</p>	<ol style="list-style-type: none"> 1. The site should be probably fenced and access allowed at controlled points. 2. One site emergency plans should be reviewed regularly. 3. All personnel working on site must be trained in accordance with the Hazardous Chemical Substance Regulations. 4. Emergency evacuation plans must be tested in accordance with the legal requirements. 5. Carry out advertisement and notification as required by provision 2(1) of the MHI Regulations. 6. Involve notification of neighbours in the site's emergency procedures. 7. Compile an Emergency Response Plan for the site, in line with SANS standard 1514 for Emergency Response Plans for MHIs, and considering local by-laws. 8. Road tankers are designed to SANS 1518 and adequately maintained (confirm with suppliers); 9. Operator presence at all times during offloading; 10. Drained area for tanker 	<p>Yearly audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of staff.</p>	<p>To be determined when required</p>

		<p>offloading linked to a separator system;</p> <ol style="list-style-type: none"> 11. Installation of Emergency Stop Buttons at various locations around the site; 12. Ensure inspections are performed on equipment carrying hazardous materials as per relevant SANS standards; 13. Consider physical barriers between tanks and pathways and other equipment to avoid collisions leading to losses of containment; 14. Ensure that clear routes for personnel and equipment movement are demarcated; 15. Ensure adequate training of personnel on the handling of hazardous materials; 16. Implement ignition source control within the raw materials, blowing agent and XPS storage areas; 17. Ensure adequate separation of XPS storage area from other flammable materials. 18. Ensure bunding and containment systems are designed per SANS standards, as appropriate; 19. Consider installation of gas detection, heat detection and other detection systems, as appropriate, within the blowing agent storage area; 20. Where appropriate, consider possible compartmentalisation of 			
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		<p>tanks to prevent complete loss of hazardous material in case of leaks.</p> <p>21. Consider installation of measures to decrease consequence distances in case of fire, e.g. fire walls in the vicinity of blowing agent storage, however, taking into account the potential for further confinement as a result.</p> <p>22. Ensure that the site's existing fire system is checked by a qualified Fire Engineer and if need be, upgraded.</p> <p>23. Re-do the MHI Risk Assessment after 5 years, or re-do the assessment if details of the installations change significantly, or if a loss of containment event occurs.</p>			
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Any emergency incident, originating at the facility, which falls within the definition of section 30 (1) a of the National Environmental Management Act (NEMA) Act 107 of 1998, must be dealt with by the facility in accordance with section 30 of NEMA". In the event of any incident the facility must ensure containment by the responsible person and report the incident to DEADP (Mr Simon Botha 0214830752).

Goal 6: Noise Management

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<i>Ensure allocation of sufficient resources for monitoring</i>	Noise nuisance	<ol style="list-style-type: none"> 1. A complaints register must be maintained and all complaints must be investigated and all complainants responded to. 2. Noise monitoring must be conducted in accordance with the Noise-Induced Hearing Loss Regulations every 24 months. 	Yearly audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant	Adequate annual Budgets. On-going employment of staff.	To be determined when required

Goal 7: Storage and Handling of Dangerous Goods

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<i>Ensure allocation of sufficient resources for on-going maintenance. e.g. staff, equipment, budget</i>	Pollution and fire risks. Health and safety risks.	<ol style="list-style-type: none"> 1. Training in accordance with the Hazardous Chemical Substance Regulations. 2. MSDS's to be retained on site. 3. The required PPE must be worn at all times as per MSDS's. <ul style="list-style-type: none"> - hand: Gloves - eye: Goggles - skin: Overalls 4. Keep away from sources of ignition. 	Yearly audits of operations vs EMP to identify those requirements that are not being met. Responsibility: Applicant	Adequate annual Budgets. On-going employment of staff.	To be determined when required

		5. Storage and Handling of the substances in accordance with the MSDS's.			
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Goal 8: Storage Tank Management

Objectives	Risks	Actions	Monitoring	Criteria/Targets	Remedial Actions
<i>Ensure allocation of sufficient resources for on-going maintenance. e.g. staff, equipment, budget</i>	Pollution and fire risks.	<ol style="list-style-type: none"> 1. Measures to prevent over-filling of tanks will also be put in place. 2. Detailed stock inventory must also take place and this will provide an indication if leaks are occurring. 3. Conduct integrity tests as per legal requirements. 4. Corrosion protection as per the relevant SANS standard must be maintained. 5. A site-specific Leak Detection and Repair (LOAR) programme must be implemented as a preventative measure to mitigate emissions to atmosphere and leaks from all tanks, pipes, valves etc. on site 	<p>Yearly audits of operations vs EMP to identify those requirements that are not being met.</p> <p>Responsibility: Applicant</p>	<p>Adequate annual Budgets. On-going employment of staff.</p>	To be determined when required

CHAPTER 8

ENVIRONMENTAL REPORTING

In order to ensure that the necessary environmental issues are adequately addressed and recorded, the following environmental reporting shall be undertaken:

- Incident reporting; and
- Compliance reporting

See below for a template of an Incident Report to serve as a guideline for the recording and addressing of emergency incidents as and when they occur.

ENVIRONMENTAL INCIDENT REPORT

DATE:	File Ref:
NAME:	Copy to:
EXACT LOCATION OF INCIDENT:	

SECTION 1 : DESCRIPTION OF INCIDENT

SECTION 2 : REMEDIAL ACTION REQUIRED

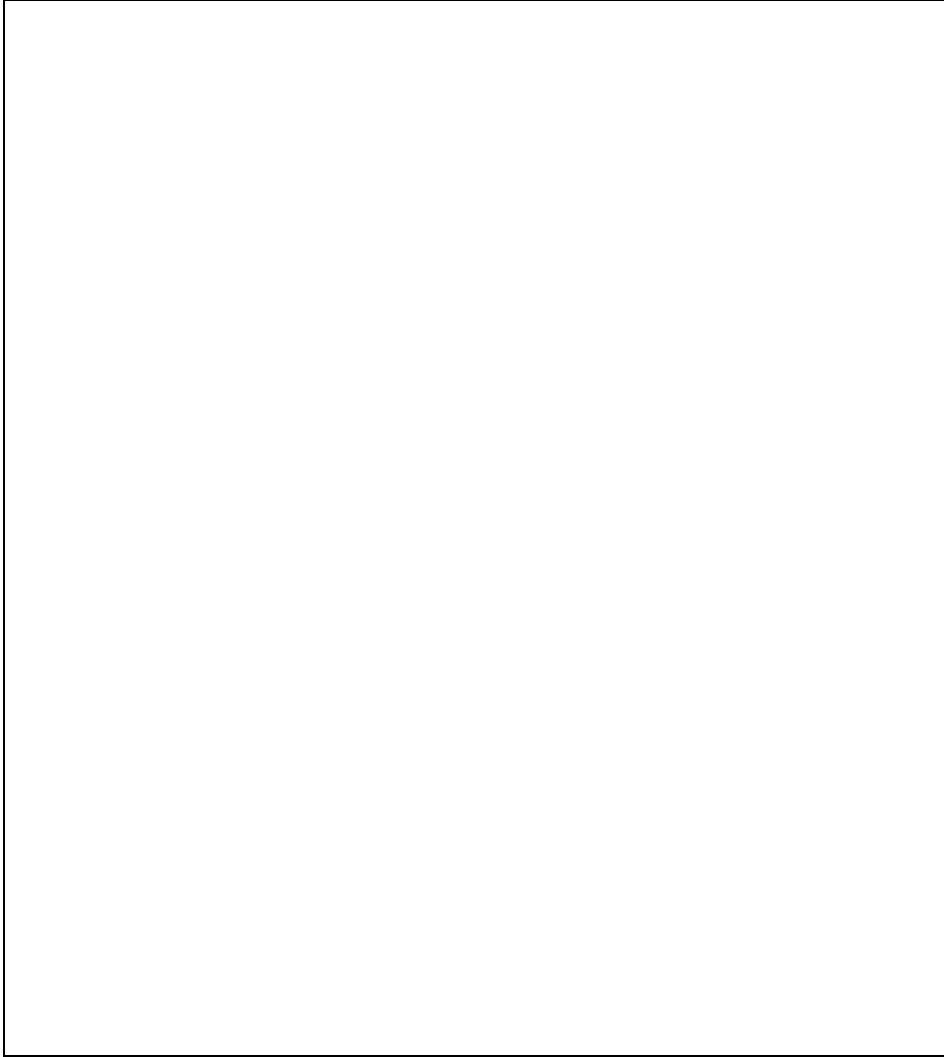
Remedial Action Due Date: _____
Confirmation of implementation: Name: _____ Date: _____

SECTION 3 : RELEVANT DOCUMENTATION

SECTION 4 : SIGNATURES

Municipal Engineer:
Name:
Date:
ECO:
Name:
Date:

SECTION 5: DRAWING/SKETCH



CHAPTER 9

DECOMMISSIONING PHASE

The decommissioning phase EMP provides specific guidance with respect to the management of the environmental risks associated with the decommissioning stage of a project.

Closure and decommissioning impacts are likely to be similar to the construction phase impacts. The management actions and control under the construction phase EMP need to be implemented to mitigate the negative impacts on the environment and to restore the property to its natural state.

A decommissioning phase is where a structure is removed or otherwise modified to make it incapable for re-use for the original design purpose.

The results of environmental monitoring during the decommissioning phase will be used to assess the impact of the decommissioning on the surrounding environment and demonstrate compliance with regulatory requirements.

The actual scope of the decommissioning environmental monitoring will be established following consultation with the regulatory authorities. The format of decommission management strategy will probably be similar to that of earlier development phases and consist of the following:

- Management Principles
 - Develop monitoring procedures in accordance with standard protocols and the requirements of the environmental legislation.
 - Undertake environmental monitoring during the decommissioning phase as shown below.

Environmental monitoring during the decommission phase will include water quality, terrestrial flora rehabilitation monitoring.

CHAPTER 10

REHABILITATION SPECIFICATIONS AND SITE CLEAN-UP

The contractors must ensure that all temporary structures, equipment, materials and facilities used or created on site for, or during construction activities, are removed once the project has been completed. The construction sites must be cleared, and cleaned to the satisfaction of the developer.

CHAPTER 11

ENVIRONMENTAL AWARENESS INDUCTION COURSE MATERIAL

This section of the report is included in compliance with Section 24N (3) (c) of the National Environmental Management Act 107 of 1998.

WHAT IS THE ENVIRONMENT?

- Soil
- Water
- Plants
- People
- Animals
- Air we breathe

the houses



• Air, plants, cars &

WHY MUST WE LOOK AFTER THE ENVIRONMENT?

- It affects us all as well as future generations
- We have a right to a healthy environment
- A Policy and System will be signed

HOW DO WE LOOK AFTER THE ENVIRONMENT?

- Report problems to your supervisor/ foreman
- Team work
- Follow the rules in the EMP



WORKING AREAS

Workers & equipment must stay inside the site boundaries at all times



RIVERS & STREAMS

- Do not swim in or drink from streams
- Do not throw oil, petrol, diesel, concrete or rubbish in the stream
- Do not work in the stream without direct instruction
- Do not damage the banks or vegetation of the stream



ANIMALS

- Do not injure or kill any animals on the site
- Ask your supervisor or Contract's Manager to remove animals found on site



TREES AND FLOWERS

- Do not damage or cut down any trees or plants without permission
- Do not pick flowers



SMOKING AND FIRE

- Put cigarette butts in a rubbish bin
- Do not smoke near gas, paints or petrol
- Do not light any fires without permission
- Know the positions of fire fighting equipment
- Report all fires
- Do not burn rubbish or vegetation without permission



PETROL, OIL AND DIESEL

- Work with petrol, oil & diesel in marked areas
- Report any petrol, oil & diesel leaks or spills to your supervisor
- Use a drip tray under vehicles & machinery
- Empty drip trays after rain & throw away where instructed



DUST

Try to avoid producing dust



NOISE

- Do not make loud noises around the site, especially near schools and homes
- Report or repair noisy vehicles



TOILETS

- Use the toilets provided
- Report full or leaking toilets



EATING

- Only eat in demarcated eating areas
- Never eat near a river or stream
- Put packaging & leftover food into rubbish bins



RUBBISH

- Do not litter – put all rubbish (especially cement bags) into the bins provided
- Report full bins to your supervisor
- The responsible person should empty bins regularly



TRUCKS AND DRIVING

- Always keep to the speed limit
- Drivers - check & report leaks and vehicles that belch smoke
- Ensure loads are secure & do not spill



EMERGENCY PHONE NUMBERS

Know all the emergency phone numbers:

- Ambulance:
- Fire:
- Police: 10111



FINES AND PENALTIES

- Spot fines of between R20 and R2000
- Your company may be fined
- Removal from site
- Construction may be stopped



PROBLEMS - WHAT TO DO!

- Report any breaks, floods, fires, leaks and injuries to your supervisor
- Ask questions!



ATTENDANCE REGISTER FOR	
PLACE	TRAINER.....
NAME & SURNAME	SIGNED
SIGNED	DATE & TIME

CHAPTER 12

COMPLIANCE WITH THE ENVIRONMENTAL AUTHORISATION

All conditions of the Environmental Authorisation must be adhered to onsite during the construction-, operational-, decommissioning- and rehabilitation phases of the proposed project. A copy of the Environmental Authorisation must be available on site together with the EMP and all contractors on site must sign the Declaration of Understanding as proof of awareness and understanding of all the conditions to be adhered to on site in terms of the EA and EMP.

CHAPTER 13

UPDATING/ADAPTING THE EMP

Although care has been taken to address all known relevant environmental issues for the development, it will become necessary to add or amend certain procedures or instructions to improve the efficiency of the EMP. Only those additions to, or amendments of, this EMP that will either improve environmental protection or can be proven not to have any negative effects would be considered to be included, and any amendments to the EMP must first be approved by the ECO and competent authority/ies i.e. DEA&DP.

REFERENCES

City of Cape Town (2002) Environmental Management Programme (Version 5) for Civil Engineering Construction Activities.

DEA&DP: ENVIRONMENTAL MANAGEMENT PROGRAMME. VER 5 (04/2002). Guideline Document for the ECO / ESO and the ER

Department of Water Affairs and Forestry, February 2005. Environmental Best Practice Specifications: Construction Integrated Environmental Management Sub-Series No. IEMS 1.6. Third Edition. Pretoria.

Curriculum vitae of Jessica Hansen

Personal Details

Nationality: South African

ID: 9003160270083

Address: 6a Avalon Road, Claremont, Cape Town 7708

Date of Birth: 16.03.1990

Language Proficiency: English - Excellent: speaking, reading, writing Afrikaans- Second language, moderate skill

Driver's license: Yes

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Jessica has completed her professional registration in terms of section 20(3) (b) of the Natural Scientific Professions Act, 2003 (Act 27 of 2003) as a Professional Natural Scientist in the field of practice Environmental Science (Registration number 400192/16).

Work Experience

May-July 2013: Research assistant at the University of Cape Town Zoology Department

August 2013- Current: Senior EAP at Eco Impact Legal Consulting (Pty) Ltd.

Key Responsibilities:

- Drafting / Completing Application forms for Basis Assessment Reports and Full Scoping Environmental Impact Reports
- Drafting / Completing draft and final Basis Assessment Reports and Full Scoping Environmental Impact Reports
- Public participations process
- Drafting Environmental Management Plans

Education

2012 - University of Cape Town

MSc in Applied Marine Science (by coursework and dissertation)

Course work subjects: Project Management, Numerical skills & Statistics, Ocean Tools, Marine Environmental Law, Introduction to Global Warming & Earth System Science, Population & Fisheries Modelling, Marine Conservation, Ecosystem Approach to Fisheries and Marine Ecosystems.

Master's thesis- "A comparison of parasite assemblages of Cape horse mackerel (*Trachurus capensis*) from the northern and southern Benguela."

2011 - University of Cape Town

BSc (Honours) in Environmental and Geographical Science (specialization Environmental Management)

Course work subjects: Environmental Law for non-lawyers, Living with Environmental Change, Environmental Management and Applied research in Environmental Management.

Honours thesis – "An examination of the encroachment of *Putterlickia pyracantha* in the Witzands Aquifer Nature Reserve."

2008 – 2010 - University of Cape Town

BSc in Environmental and Geographical Science and Oceanography and Atmospheric Science

Deans Merit list 2010

1996 – 2007 - St Mary's DSG, Kloof, KZN Subjects: Mathematics, English, Afrikaans, Geography, Biology, History

Additional courses

1. 04-05 February 2015 – Energy Management Systems Implementation (EnMS) 2 day Advanced Training (UNIDO, NCPC)
2. May 2015- May 2016 – Energy Management Systems Implementation (EnMS) Expert Level Training (UNIDO, NCPC)
3. 10 August 2016 - Energy Performance Measurement and Indicators (EnPMI) - ISO50006 - 2 day Advanced Training (UNIDO, NCPC)

APPENDIX A Conservation Map



Legend

- Erf
- BSP ESA: Restore**
 - ESA2: Restore from plantation or high density IAP
 - ESA2: Restore from other land use
 - ESA2: Restore where appropriate (CT)
- BSP ESA**
 - ESA: Aquatic
 - ESA: Terrestrial
 - Other Natural Area
- BSP CBA**
 - CBA: Terrestrial
 - CBA: Terrestrial (CT)
 - CBA: Forest
 - CBA: River
 - CBA: Estuary
 - CBA: Wetland
 - CBA: Aquatic (CT)
- BSP CBA: Degraded**
 - CBA2: Aquatic
 - CBA2: Terrestrial

Scale: 1:4 514

Date created: May 6, 2019

Compiled with CapeFarmMapper



**Western Cape
Government**

Agriculture

Surveyor-General WC, Department of Rural Development and Land Affairs
Map Data © Google
Department of Rural Development and Land Reform
CapeNature, DEA

0 0.05 0.1 0.2 km

Waste Management for Stand 245 Atlantis

1. Amount of waste.

We estimate the following:

Plastic's 1100kg/month

Paper/Carton 300 kg/month

General Waste 1000 kg/month

2. Measure to prevent pollution.

- a. Appoint a Waste specialized business (accredited) that removes the waste. Eg. Zingari waste
- b. Closed bins for the waste.
- c. Trained personal to handle waste.
- d. Housekeeping measures.
- e. Waste disposal unit to bins.

3. Targets, measures & actions to minimize waste.

- a. Put in a reclaimer to rework any waste. (Zero waste on product)
- b. Recycling through Zingari and other subcontractors. (BEE partners)
- c. Waste reduction program with personal training.

4. Actions to Manage waste.

- a. Appoint sub-contractors that manage waste disposal.
- b. Accredited company with good track record will be appointed.
- c. Trained personal will do the management from Swartland of the contractors.
- d. Minimal Use of Municipality waste service.

5. Reduce waste by means of production design.
 - a. The factory process will be auto-mechanical done that will help with reduction of waste management.
 - b. Manage waste by installing rework's plant.
 - c. Installing Recycling machine by Sunwell Global.
6. Mechanism to inform public of the impact of waste generating products on the environment.
 - a. Our product brochure will inform the public of the waste saving measures it brings to the applications.
 - b. The product advertising on social media & other media will have the same measures of information to the public.
7. Period required for implementation of plan.
 - a. The construction period for plant and extensions will be approximately 11 Months.
 - b. Thereafter the operational waste management program will start.
 - c. The starting date depends on the approvals of the BAR and Municipality authorisations.
8. Methods of monitoring and reporting.
 - a. Our monitoring and reporting will start on factory floor level with the supervisors to the factory manager weekly.
 - b. The factory managers will report this monitoring on the monthly meeting to the executive board.
9. Waste recycling and disposal:
 - a. Sub-contractors

Our company, Zingari Waste & Recycling CC, situated in Charles Duminy Close Atlantis, provides a waste and recycling service to the Swartland Group in Atlantis which includes the following:

A full-time employee on site who separates waste material from recyclable/re-usable material. The employee is also responsible to keep the areas neat and

clean. 30m³ Bins are provided for cardboard (K4), plastic and white paper as well as bins for general waste.

When the recycling bins are full, our company collects the bins with a roll on roll off truck. At our premises the products are sorted. Plastic and cardboard is baled and once the quota per product is reached, the respective recyclers are contacted and materials are transported off site for further processing.

General waste is collected on request (minimum once per week), weighed and transported to Vissershok Landfill for disposal. No hazardous waste is stored or transported.

A 6m³ bin is provided on request for all scrap metal. The bin is collected with a roll on roll off truck for sorting and stored in a 30m³ bin. Once the quota is reached, the metals are transported off site for further processing.

We abide by legislations, strategies and policies in terms of minimising the impacts of waste on the environment as well as minimising the amount of waste disposed of at landfills. Disposal is only considered once all alternatives including recovery re-use and recycling has been considered. Our waste management license number is E13/2/10/1-A1/293-WL0043/10 and we have accreditation from the City of Cape Town.

This service can be extended to include waste and recycling generated at Erf 245 Atlantis (Swartland Insulation) with approximate weights of:

Plastic's 1100kg/month

Paper/Carton 300 kg/month

General Waste 1000 kg/month