

APP-001891
OPERATIONS OF THE EXISTING SANTORINI SERVICE
STATION IN OSHAKATI
UPDATED ENVIRONMENTAL MANAGEMENT PLAN



Assessed by:



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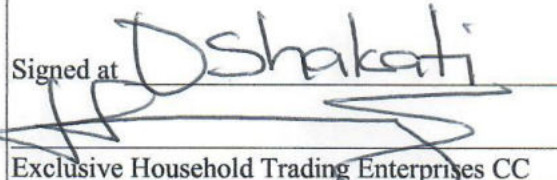
**Exclusive Household
Trading Enterprises CC**

July 2023

Project:	UPDATED ENVIRONMENTAL MANAGEMENT PLAN FOR THE OPERATIONS OF THE EXISTING SANTORINI SERVICE STATION IN OSHAKATI	
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Report Approval	 André Faul	

I Mathews Silongo acting as the representative of Exclusive Household Trading Enterprises CC, hereby confirm that we approve the Environmental Management Plan as presented in this document. All material information in the possession of the Proponent that reasonably has or may have the potential of influencing the Environmental Management Plan was provided to the consultant.

Signed at Oshakati on the 01 day of August 2023.


Exclusive Household Trading Enterprises CC

CC/2008/3109
Company Registration Number

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1 INTRODUCTION

Exclusive Household Trading Enterprises CC (the Proponent) owns and operates a fuel retail facility, the Santorini Service Station, in Oshakati, Oshana Region (Figure 1-1). The facility receives fuel (diesel and unleaded petrol) from fuel tanker trucks and stores the fuel in underground storage tanks. Fuel is dispensed to clients' vehicles by pump attendants with pumps in a forecourt area underneath an overhead canopy. An environmental impact assessment was conducted for the facility in 2017 (Faul et al. 2017) and an environmental clearance certificate (ECC) issued. The ECC was subsequently renewed and now the Proponent requested Geo Pollution Technologies (Pty) Ltd to update their environmental management plan (EMP) in order to again renew the ECC. The renewed ECC is required for the continued operations and construction (care and maintenance) of the fuel retail facility.

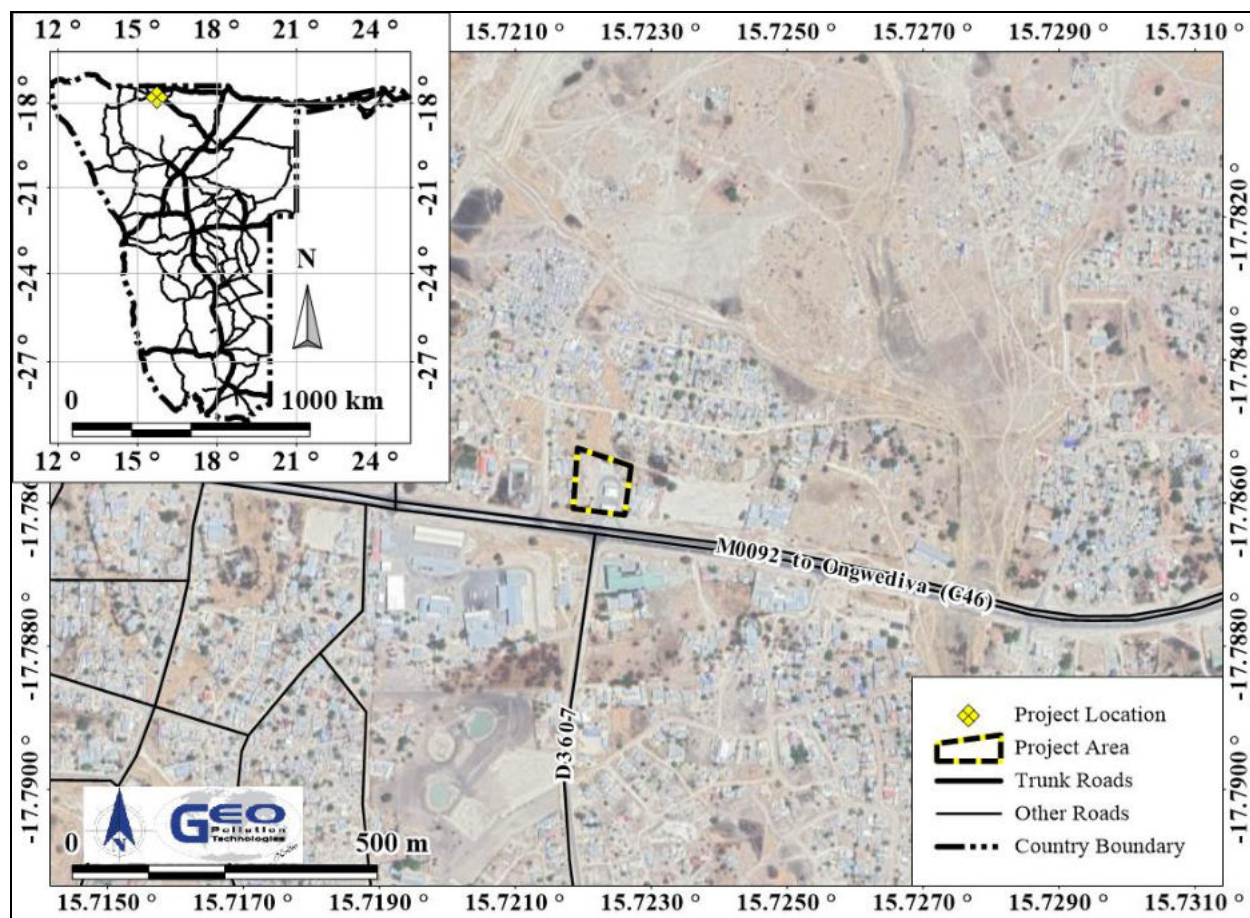


Figure 1-1 Project location

2 ENVIRONMENTAL MANAGEMENT PLAN

The EMP provides management options to ensure impacts of the facility are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary. The environmental management measures are provided in the tables and descriptions below. These management measures should be adhered to during the various phases of the operations of the facility. All personnel taking part in the operations of the facility should be made aware of the contents in this section, so as to plan the operations accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- ◆ to include all components of operations, maintenance and possible decommissioning of the facility,

- ◆ to prescribe the best practicable control methods to lessen the environmental impacts associated with the facility,
- ◆ to monitor and audit the performance of operational personnel in applying such controls; and
- ◆ to ensure that appropriate environmental training is provided to responsible operational personnel.

2.1 Implementation of the EMP

The sections below outline the management of the environmental elements that may be affected by the different activities. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on. Delegation of mitigation measures and reporting activities should be determined by the Proponent and included in the EMP. The EMP is a living document that must be prepared in detail, and regularly updated, by the Proponent as the project progress and evolve.

The EMP and ECC must be communicated to the site managers. A copy of the ECC and EMP should be kept on site. All monitoring results must be reported on as indicated. Reporting is important for any future renewals of the ECC and must be submitted to the Ministry of Environment, Forestry and Tourism. Renewal of ECC will require six monthly reports based on the monitoring prescribed in this EMP.

Various potential and definite impacts will emanate from the operations and decommissioning phases. The majority of these impacts can be mitigated or prevented. The prevention and mitigation measures are listed below.

2.1.1 Planning

During the phases of planning for construction (upgrades, maintenance etc.) continued operations and possible future decommissioning of the facility, it is the responsibility of Proponent to ensure they are, and remain, compliant with all legal requirements. The Proponent must also ensure that all required management measures are in place prior to, and during all phases, to ensure potential impacts and risks are minimised. The following actions are recommended for the planning phase and should continue during various other phases of the project:

- ◆ Ensure that all necessary permits from the various ministries, local authorities and any other bodies that governs the operations of the facility are in place and remains valid. This includes the petroleum products licence.
- ◆ Ensure all appointed contractors and employees enter into an agreement which includes the EMP. Ensure that the contents of the EMP are understood by the contractors, sub-contractors, employees and all personnel present or who will be present on site.
- ◆ Make provisions to have a health, safety and environmental (HSE) coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.
- ◆ Have the following emergency plans, equipment and personnel on site, where reasonable, to deal with all potential emergencies:
 - EMP, risk management, mitigation, emergency response plan and HSE manuals;
 - Adequate protection and indemnity insurance cover for incidents;
 - Comply with the provisions of all relevant safety standards;
 - Procedures, equipment and materials required for emergencies.
- ◆ If one has not already been established, establish and maintain a fund for future restoration of the project site should project activities cease and the site is decommissioned and environmental restoration or pollution remediation is required.
- ◆ Establish and/or maintain a bi-annual reporting system to report on aspects of operations, maintenance and decommissioning as outlined in the EMP.
- ◆ Submit bi-annual reports to the MEFT to allow for ECC renewal after three years. This is a requirement by MEFT.
- ◆ Appoint a specialist environmental consultant to update the EMP and apply for renewal of the ECC prior to expiry.

2.1.2 Revenue Generation and Employment

Continued operations and maintenance of the facility relies on employment. Skilled and unskilled labourers are employed or contracted for various tasks of operations and maintenance. Unskilled labour may be sourced locally while it is expected that skilled contractors within Namibia will be used for specialised work. The presence of the facility therefore contributes to employment creation in the skilled and unskilled labour sector. Retailing of fuel contributes to revenue generation which is paid to the national treasury while also contributing to the local economy in terms of increased spending power of employees as well as the sourcing of goods and services.

Desired Outcome: Contribution to national treasury and provision of employment to local Namibians.

Actions

Enhancement:

- ◆ The Proponent must employ local Namibians where possible.
- ◆ If the skills exist locally, employees must first be sourced from the town, then the region and then nationally.
- ◆ Deviations from this practice must be justified.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Bi-annual summary report based on employee records.

2.1.3 Skills, Technology and Development

During operations of the facility, training is provided to a portion of the workforce to be able to perform their duties according to the required standards. Skills are transferred to an unskilled workforce for general tasks. Development of people and technology are key to economic development of the town, region and nationally.

Desired Outcome: To see an increase in skills of local Namibians, as well as development and technology advancements in the fuel industry.

Actions

Enhancement:

- ◆ If the skills exist locally, contractors and employees must first be sourced from the town, region, and then nationally. Deviations from this practice must be justified.
- ◆ Skills development and improvement programs to be made available as identified during performance assessments.
- ◆ Employees to be informed about parameters and requirements for references upon employment.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Record should be kept of training provided.
- ◆ Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- ◆ Bi-annual summary reports on all training conducted.

2.1.4 Demographic Profile and Community Health

The facility relies on labour for operations. The scale of the project is limited and it is not foreseen that it has or will in future create a change in the demographic profile of the local community. Exposure to factors such as communicable disease like HIV/AIDS as well as alcoholism / drug abuse are often associated with the trucking industry (i.e. fuel deliveries). Spills and leaks may present risks to members of the public especially if groundwater is polluted.

Desired Outcome: To prevent the in-migration and growth in informal settlements and to prevent the spread of diseases such as HIV/AIDS.

Actions:

Prevention:

- ◆ Employ only local people from the area, deviations from this practice should be justified appropriately.
- ◆ Adhere to all municipal by-laws relating to environmental health which includes, but is not limited to, sand and grease traps for the various facilities and sanitation requirements.

Mitigation:

- ◆ Educational programmes for employees on HIV/AIDS and general upliftment of employees' social status.
- ◆ Appointment of reputable contractors.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Facility inspection sheet for all areas which may present environmental health risks, kept on file.
- ◆ Bi-annual summary report based on educational programmes and training conducted.
- ◆ Bi-annual report and review of employee demographics.

2.1.5 Fuel Supply

The facility contributes to ensuring a reliable and convenient supply of fuel to the town, local businesses and residents and the transport industry.

Desired Outcome: Ensure a secure fuel supply remains available.

Actions

Mitigation:

- ◆ Ensure compliance to the petroleum regulations of Namibia which specify adherence to SANS standards for fuel retail facilities.
- ◆ Proper management to ensure constant supply.
- ◆ Record supply problems and take corrective actions.
- ◆ Communicate any fuel shortages and expected delays in supply at a visible location on site.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Record supply problems and corrective actions taken and compile a bi-annual summary report.

2.1.6 Traffic

The presence of the facility increase traffic flow in the area. This may increase the risk of incidents and accidents especially during the fuel deliveries.

Desired Outcome: Minimum impact on traffic and no transport or traffic related incidents.

Actions

Prevention:

- ◆ Erect clear signage regarding access and exit points at the facility.
- ◆ Tanker trucks collecting and delivering fuel should not be allowed to obstruct any traffic.

Mitigation:

- ◆ If any traffic impacts are expected, traffic management should be performed.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Any complaints received regarding traffic issues should be recorded together with action taken to prevent impacts from repeating itself.
- ◆ A report should be compiled bi-annually of all incidents reported, complaints received, and action taken.

2.1.7 Health, Safety and Security

Every activity associated with the operational phase is reliant on human labour and therefore exposes them to health and safety risks. Activities such as the operation of machinery and handling of hazardous chemicals (inhalation and carcinogenic effect of some petroleum products), poses the main risks to employees. Security risks are related to unauthorized entry, theft and sabotage.

Desired Outcome: To prevent injury, health impacts and theft.

Actions

Prevention:

- ◆ Implement and maintain an integrated health and safety management system, to act as a monitoring and mitigating tool, which includes: colour coding of pipes, operational, safe work and medical procedures, permits to work, emergency response plans, housekeeping rules, MSDS's and signage requirements (PPE, flammable etc.).
- ◆ All health and safety standards specified in the Labour Act should be complied with.
- ◆ Clearly label dangerous and restricted areas as well as dangerous equipment and products, especially during the construction phase.
- ◆ Equipment on site must be locked away or placed in a way that does not encourage criminal activities (e.g. theft).
- ◆ Provide all employees with required and adequate personal protective equipment (PPE).
- ◆ Ensure that all personnel receive adequate training on operation of equipment/handling of hazardous substances.
- ◆ Implementation of maintenance register for all equipment and fuel / hazardous substance storage areas.
- ◆ Selected personnel should be trained in first aid and a first aid kit must be available on site. The contact details of all emergency services must be readily available.
- ◆ Security procedures and proper security measures must be in place to protect workers and clients.
- ◆ Develop emergency response plans for all possible health, safety and security impacts and appoint responsible personnel in key positions to activate and oversee such plans when required.

Mitigation:

- ◆ For all emergency situations, the appropriate emergency response plan must be implemented as soon as possible in order to minimize the magnitude of impacts or prevent such impacts from developing into more severe impacts.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Any incidents must be recorded with action taken to prevent future occurrences.
- ◆ A report should be compiled bi-annually of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained.

2.1.8 Fire

Construction and operational activities may increase the risk of the occurrence of fires. Unleaded petrol is extremely flammable and being a static accumulator may ignite if handled incorrectly.

Desired Outcome: To prevent property damage, possible injury and impacts caused by uncontrolled fires.

Actions:

Prevention:

- ◆ A holistic fire protection and prevention plan must be developed for the site and it should specifically take into account flammable products stored on site. This plan must include an emergency response plan, firefighting plan and a spill recovery plan and should have dedicated assigned personnel to oversee their development and implementation.
- ◆ Firefighting equipment must be maintained and regularly serviced.
- ◆ Regular personnel training (firefighting, fire prevention and responsible housekeeping practices).
- ◆ Ensure all chemicals are stored strictly according to MSDS and SANS instructions. This include segregation of incompatible products.
- ◆ Maintain regular site, mechanical and electrical inspections and perform regular maintenance.
- ◆ Clean all spills/leaks without delay and dispose of any contaminated material according to their MSDS requirements and at suitable locations to prevent the accumulation of flammable or explosive products on site.
- ◆ For fuel storage, special note must be taken of the regulations stipulated in sections 47 and 48 of the Petroleum Products and Energy Act, 1990 (Act No. 13 of 1990) and SANS standards for operation and maintenance of the consumer fuel installation should be followed.

Mitigation:

- ◆ For any fire related emergency situation, the appropriate emergency response plan must be implemented as soon as possible in order to minimize the magnitude of impacts or prevent such impacts from developing into more severe impacts.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- ◆ A report should be compiled bi-annually of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given.

2.1.9 Air Quality

The operational phase release fuel vapours into the air during refuelling of bulk storage tanks as well as at dispensing points. Prolonged exposure may have carcinogenic effects. Construction and refurbishment activities may cause dust where soil surfaces are exposed.

Desired Outcome: To prevent health impacts related to reduced air quality.

Actions

Mitigation:

- ◆ Employees should be informed about the dangers of fuel vapours.
- ◆ Vent pipes must be properly placed as per SANS requirements.
- ◆ Dust masks should be provided to employees where dust impacts are expected and dust suppression by means of water implemented.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Any complaints received regarding fuel vapours or dust should be recorded with notes on action taken.
- ◆ All information and reporting to be included in a bi-annual report.

2.1.10 Noise

Noise pollution may be generated due to heavy and light motor vehicles accessing the site to offload fuel or refuel. Construction and refurbishment activities may result in a temporary increase in noise levels.

Desired Outcome: To prevent any nuisance and hearing loss due to noise generated.

Actions

Prevention:

- ◆ Follow Health and Safety Regulations of the Labour Act and World Health Organisation (WHO) guidelines for limits to noise pollution to prevent hearing impairment and a nuisance at nearby receptors.
- ◆ All machinery must be regularly serviced to ensure minimal noise production.
- ◆ Manage noise caused by clients including loud music.

Mitigation:

- ◆ Hearing protectors as standard PPE for workers in situations with elevated noise levels.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Health and Safety Regulations of the Labour Act and WHO guidelines
- ◆ Maintain a complaints register.
- ◆ Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences.

2.1.11 Waste production

Waste is produced during the operational phase. Waste includes hazardous waste associated with the handling of hydrocarbon products and servicing of vehicles. Maintenance waste may include building rubble and discarded equipment contaminated by hydrocarbon products. Contaminated soil and water is considered as hazardous waste. Domestic waste will be generated by the facility and related operations. Waste presents a contamination risk and when not removed regularly may become a fire hazard.

Desired Outcome: To reduce the amount of waste produced and prevent pollution and littering.

Actions

Prevention:

- ◆ Waste reduction measures should be implemented and all waste that can be re-used/recycled must be kept separate.
- ◆ Ensure adequate waste storage facilities are available.
- ◆ Ensure waste cannot be blown away by wind.
- ◆ Prevent scavenging (human and non-human) of stored waste.

Mitigation:

- ◆ Waste should be disposed of regularly and at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers, contaminated rugs, paper water and soil).
- ◆ See the MSDS available from suppliers for disposal of contaminated products and empty containers.
- ◆ Liaise with the town council regarding waste and handling of hazardous waste.

Responsible Body:

- ◆ Proponent
- ◆ Contractors

Data Sources and Monitoring:

- ◆ A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- ◆ Any complaints received regarding waste should be recorded with notes on action taken.
- ◆ All information and reporting to be included in a bi-annual report.

2.1.12 Ecosystem and Biodiversity Impact

The site has previously been developed and is mostly devoid of vegetation. The nature of the operational activities is such that the probability of creating a habitat for flora and fauna to establish is low. Ecosystem or biodiversity impacts are mostly associated with pollution of the environment.

Desired Outcome: To avoid pollution of, and impacts on, the ecological environment.

Actions.

Prevention:

- ◆ Educate all contracted and permanent employees on the value of biodiversity.

Mitigation:

- ◆ Contain construction material and activities on site.
- ◆ Report any extraordinary animal sightings to the MEFT.
- ◆ Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts.
- ◆ Avoid scavenging of waste by fauna.
- ◆ The establishment of habitats and nesting sites at the facility should be avoided where possible.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Any ecologically significant events or sightings to be included in a bi-annual report.

2.1.13 Groundwater, Surface Water and Soil Contamination

Operations entails the storage and handling of various hydrocarbons (such as fuels and lubricants). Such material may contaminate surface water, soil and groundwater. Contamination may either result from failing storage facilities and reticulation, or spills and leaks associated construction activities and with fuel handling such as overfills and spills.

Desired Outcome: To prevent the contamination of water and soil.

Actions

Prevention:

- ◆ All construction and or maintenance machines should be maintained to be in a good working condition during operation.
- ◆ Employ drip trays and spill kits during construction when onsite servicing/repairs of equipment are needed.
- ◆ Spill control structures and procedures must be in place according to SANS standards or better and connection of all surfaces where fuel is handled, with an oil water separator.
- ◆ Surfactants (soap) should not be allowed to enter the oil water separator as this will decrease its efficiency.
- ◆ All fuelling should be conducted on surfaces provided for this purpose. E.g. Concrete slabs with regularly maintained seals between slabs.
- ◆ The procedures followed to prevent environmental damage during service and maintenance, and compliance with these procedures, must be audited and corrections made where necessary.
- ◆ Proper training of operators must be conducted on a regular basis (fuel handling, spill detection, spill control).

Mitigation:

- ◆ Any spillage of more than 200 l must be reported to the Ministry of Mines and Energy.
- ◆ Spill clean-up means must be readily available on site as per the relevant MSDS and all spills must be cleaned up immediately.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Daily tank inspections and dips to detect product loss due to leaks as soon as possible.
- ◆ A report should be compiled bi-annually of all spills or leakages reported. The report should contain the following information: date and duration of spill, product spilled, volume of spill, remedial action taken, comparison of pre-exposure baseline data (previous pollution conditions survey results) with post remediation data (e.g. soil / groundwater hydrocarbon concentrations) and a copy of documentation in which spill was reported to Ministry of Mines and Energy.

2.1.14 Visual Impact

This is an impact that not only affects the aesthetic appearance, but also the integrity of the facility. The general upkeep and maintenance of the facility will not only reduce any negative visual impacts, but also ensure the longevity of the structures and buildings. Proposed upgrades will have a positive visual impact.

Desired Outcome: To minimise aesthetic impacts associated with the facility and prevent lighting from being a visual disturbance.

Actions

Mitigation:

- ◆ Regular waste disposal, good housekeeping and routine maintenance on infrastructure will ensure that the longevity of structures are maximised and a low visual impact is maintained.
- ◆ Lighting should be directed towards the facility and away from residents where possible.
- ◆ Minimum lighting necessary for operations to be used at night. The installation of auto-dimming lights when no movement is detected are desirable.

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ A report should be compiled every bi-annually of all complaints received and actions taken.

2.1.15 Cumulative Impact

Possible cumulative impacts associated with the operational phase include increased traffic and noise in the area.

Desired Outcome: To minimise all cumulative impacts associated with the facility.

Actions

Mitigation:

- ◆ Addressing each of the individual impacts as discussed and recommended in the EMP would reduce the cumulative impact.
- ◆ Reviewing bi-annual and annual reports for any new or re-occurring impacts or problems would aid in identifying cumulative impacts and help in planning if the existing mitigations are insufficient

Responsible Body:

- ◆ Proponent

Data Sources and Monitoring:

- ◆ Review bi-annual reports to determine the overall impact of the operational phase.

2.2 Decommissioning and Rehabilitation

Decommissioning is not foreseen during the validity of the ECC. Decommissioning was however assessed. Should decommissioning occur at any stage, rehabilitation of the area may be required. Decommissioning will entail the complete removal of all infrastructure including buildings and underground infrastructure. Any pollution present on the site must be remediated. A soil conditions survey should be conducted to detect any hydrocarbon pollution and to implement remediation measures. The impacts associated with this phase include noise and waste production as structures are dismantled. Noise levels must adhere to the Health and Safety Regulations of the Labour Act and WHO guidelines. Waste should be contained and disposed of at an appropriately classified and approved waste facility and not dumped in the surrounding areas. Future land use after decommissioning should be assessed prior to decommissioning and rehabilitation initiated if the land will not be used for similar future purposes. The EMP for the facility will have to be reviewed at the time of decommissioning to cater for changes made to the site and to implement guidelines and mitigation measures.

2.3 Environmental Management System

The Proponent could implement an Environmental Management System (EMS) for their operations. An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- ◆ A stated environmental policy which sets the desired level of environmental performance;
- ◆ An environmental legal register;
- ◆ An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- ◆ Identification of environmental, safety and health training needs;
- ◆ An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy; and
- ◆ Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS.
- ◆ The EMP.

3 CONCLUSION

The fuel retail facility has a positive impact on the various sectors operational in the town and surrounding community. In addition to reliable and convenient fuel supply, the facility contributes to employment, skills transfer and training, which in turn develops the local workforce. Proposed upgrades and refurbishment will ensure the operations remain compliant with legislative requirements, and aid in securing a constant and reliable supply of fuel.

Negative impacts can successfully be mitigated. SANS standards relating to the petroleum industry and prescribed by Namibian law must be followed during all operations of the fuel retail facility. Noise pollution should at all times meet the prescribed Health and Safety Regulations of the Labour Act and WHO guidelines to prevent hearing loss and not to cause a nuisance. Fire prevention should be adequate, and health and safety regulations should be adhered to in accordance with the regulations pertaining to relevant laws and internationally accepted standards of operation. Any waste produced must be removed from site and disposed of at an appropriate facility or re-used or recycled where possible. Hazardous waste must be disposed of at an approved hazardous waste disposal site. Spill containment infrastructure is key in preventing pollution of the environment and includes drip trays and suitably surfaced areas where fuel is handled.

The EMP should be used as an on-site reference document for the operations of the facility. Parties responsible for transgressing of the EMP should be held responsible for any rehabilitation that may need to be undertaken. The Proponent could use an in-house health, safety, security and environment

management system in conjunction with the EMP. All operational personnel must be taught the contents of these documents.

Should the Directorate of Environmental Affairs (DEA) of the MEFT find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, an ECC may be granted to the Proponent. The ECC issued, based on this document, will render it a legally binding document which should be adhered to.

4 REFERENCES

Faul A, Botha P. 2017. Environmental Impact Assessment for the Construction and Operations of a Fuel Retail Facility for Exclusive House Trading Enterprises CC in Oshakati