



**ENVIRONMENTAL MANAGEMENT PLAN (EMP) FOR THE  
OPERATION OF THE EXISTING BACH STREET SERVICE  
STATION IN WINDHOEK, KHOMAS REGION**

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## **1.INTRODUCTION**

Puma Energy Namibia Pty (Ltd) seeks to regularize the operation of existing Bach Street Service Station in accordance with the Environmental Management Act No. 7 of 2007, which specifies that the construction and operations of a fuel retailing facility requires an Environmental Impact Assessment (EIA) and an Environmental Clearance Certificate (ECC). Bach Street service Station was established before the EMA (2007) came into force; hence it has been operating without an ECC. It is on basis of the above that Nam Geo-Enviro Solutions has been appointed by Puma Energy Namibia to compile an Environmental Management Plan (EMP) and apply for the ECC for the continuous operations of Bach Street service station. JA Damon is the current general dealer of Bach Street service station.

The Environmental Management Plan (EMP) is an on-site working document developed to ensure that the project is implemented in an environmentally sustainable manner, where all contractors and subcontractors, including consultants, understand the potential environmental impacts arising from the project and take appropriate actions to properly manage them. The EMP outlines the roles and responsibilities of the key personnel and contractors involved in the project.

This EMP is developed specifically as a managing tool for the operation of Bach Street Service Station. All Contractors and sub-Contractors taking part in this should be made aware of the contents of the EMP.

## **2.OBJECTIVES**

The environmental management plan (EMP) aims to take a pro-active route by addressing potential impacts before they occur. The objectives of the EMP are, therefore:

- To outline mitigation measures for managing environmental and socio-economic impacts associated with the project.
- Provide a framework for implementing the management actions for operational and possible decommissioning phases.
- Outline responsibilities and roles of Puma Energy Namibia Pty (Ltd) and its contractors in managing the environment.
- To enhance the project Compliance with all applicable laws, regulations, and standards for environmental protection.
- To protect the natural environment from the project's adverse impacts.
- Promote and encourage good environmental management practices.

### 3. PROJECT ACTIVITIES

This EMP covers activities in the operation and possible decommissioning phase. The activities associated with these phases are listed in the table below:

**Table 1:** Activities associated with the project.

Operational phase	Decommissioning phase
<ul style="list-style-type: none"><li>• Fuel distribution</li><li>• Off-loading of fuel</li><li>• Dispensing of fuel into vehicles</li><li>• Corrective Maintenance (Replacing of non-functioning equipment)</li></ul>	<ul style="list-style-type: none"><li>• Removal of infrastructures</li><li>• Transportation off-site</li><li>• Site rehabilitation</li></ul>

### 4.CURRENT FUEL STORAGE DETAILS ON SITE

Installations at Bach Street service station consists of five (5) underground fuel tanks, of which three are Petrol (ULP 95) with a capacity of 23m<sup>3</sup> each and two diesel tanks (50ppm) with a capacity of 23m<sup>3</sup> each.

### 5.DESCRPTION OF RECEIVING ENVIRONMENT

This section will provide an overview of the existing biophysical environment of the project site through the analysis of baseline data of the existing natural and socio-economic environment. The project site is situated in a residential area in Windhoek West, Bach street, Khomas region.

The summary of biophysical and social-economic information are summarised below

#### Climate

Climate has a major influence on all aspects of life. In Namibia climatic features vary from place to place which makes the features and utility of resources different. Windhoek has a hot semi-arid climate according to the Koppen classification system. Generally, it has warm temperatures with hot summers and mild winters. The table below outlines details of Windhoek climatic conditions.

**Table 2:** Description of climatic conditions

<b>ASPECT</b>	<b>DESCRIPTION</b>
<b>Average rainfall:</b>	250-350 mm per year
<b>Precipitation:</b>	The least precipitation occurs in June and the highest occurs in January with an average of 350 mm annually.
<b>Temperature:</b>	Warm climate with temperatures exceeding 30°C for most of the year apart from May, June and July. The average maximum temperatures are between 32°C and 34°C, whilst average minimum temperatures are around 8 °C to 10°C.
<b>Humidity:</b>	The relative humidity levels average during the least humid months of the year (i.e., September and October) is around 10-20% and the most humid month is March with 70-80% humidity. Namibia has a low humidity in general, and the lack of moisture in the air has a major impact on its climate through reduced cloud cover, low precipitation, and high rate of evaporation.
<b>Wind and Evaporation:</b>	There is a high evaporation which peak in the windy months of September and October. Winds are however moderate and mostly from the east, throughout the year.

(Source: Atlas of Namibia, 2003)

### **Topography**

Windhoek is located in the central area of the plateau at about 1700 meters with the surrounding mountains reaching a height of over 2000 meters. The site is located on relatively flat land.

### **Hydrogeology and surface drainage**

Drainage in the region is in minor ephemeral rivers in the northern direction into the Swakop River, which drains into the Atlantic Ocean at Swakopmund. At the site there are no nearby surface water bodies.

Groundwater in the area belongs to the government of the Republic of Namibia. This means that Government controls groundwater usage in this area i.e. drilling of boreholes etc.

## **Ecology: Flora and Fauna**

Windhoek is located within the Acacia tree and shrub savanna specifically under highland shrubland (Mendelsohn et al, 2003). The vegetation structure is classified as shrubs and low trees. Generally average plant production is high and variation in green vegetation biomass is low (5-10%). At the service station, the land is covered by concrete slab and interlocks. General animal species on site are small birds flying around the area and the birds have adapted to the urban environment overtime. Generally, the project does not affect any fauna or flora because it is sited in an urban landscape.

## **Social**

Windhoek is a capital city of Namibia, and many people migrate to the city to search for greener pastures hence resulting in population increase. According to NPC (2011), the population of the Khomas region was 325 858 which had increased from 250 262 in 2001. Annual growth rate in the region was estimated to be 3.1% which has suddenly increased from the 1.9% in 2001 (NPC Census 2011). Population growth in the region implies that more employment opportunities is required so as to cater for the growing population. 73% of people in the region, their main source of income comes from wages and salaries and only 1% from farming (NPC Census 2011).

The city is the administrative, commercial, and industrial center of Namibia. Windhoek provides a central linkage to all corners of the country and international borders, which translates to a high influx of people and vehicles hence increasing demand for fuel.

## 6. LEGAL FRAMEWORK: LEGISLATIONS, POLICIES AND GUIDELINES

This section outlines the regulatory framework relevant to the project. All identified crucial pieces of legislation should be adhered to, as indicated in their respective pieces of legislation.

The Environmental Management Act No. 7 of 2007 is the primary custodian of the environment which aims to; promote the sustainable management of the environment and the use of natural resources by establishing principles for decision making on matters affecting the environment; to provide for a process of assessment and control of activities which may have significant effects on the environment and to provide for incidental matters. However, this section does not only focus on the EMA, but also looks at other relevant legislations.

All identified crucial pieces of legislation should be adhered to by the proponent and all contractors, using different provisions of compliance as indicated in their respective pieces of legislation.

The table below outlines the legal frameworks relevant to the project

**Table 3:** Regulatory framework relevant to the project

LEGISLATION	RELEVANT PROVISION	TYPE OF REQUIREMENT
<b>Namibian Constitution First Amendment Act 34 of 1998</b>	<p>- "The State shall actively promote and maintain the welfare of the people by adopting policies that are aimed at maintaining ecosystems, essential ecological processes, and the biological diversity of Namibia.</p> <p>-Article 16(1) guarantees all persons the right to property, to acquire, own and dispose of property, alone or in association with others and to bequeath such property.</p> <p>-It further promotes the sustainable utilisation of living natural resources basis for the benefit of all Namibians, both present and future." (Article 95(I)).</p>	<p>-The constitution requires sustainable utilisation of natural resources basis for the benefit of all Namibians, both present and future." (Article 95(I)).</p> <p>-Through implementation of the EMP, Puma Energy Namibia should ensure conformity to the constitution in terms of environmental management and sustainability.</p>



<p><b>Environmental Management Act 7 of 2007</b></p>	<p>-Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).</p> <p>-Requires adequate public participation during the environmental assessment process for interested and affected parties to voice their opinions about a project (Section 2(b-c)).</p> <p>-According to Section 5(4) a person may not discard waste as defined in Section 5(1)(b) in any way other than at a disposal site declared by the Minister of Environment, Forestry and Tourism or in a manner prescribed by the Minister.</p>	<p>-This Act and its regulations should inform and guide the environmental assessment process.</p> <p>-The project proponent should ensure that all provisions of the EMP are implemented, and regular environmental monitoring and evaluations should be conducted by independent consultants.</p>
<p><b>EMA Regulations (2012)</b></p>	<p>-Details projects which cannot be undertaken without an ECC.</p> <p>-Details requirements for public consultation within a given environmental assessment process.</p>	<p>-This project is listed under activities which cannot be undertaken without an ECC, thus this EMP is compiled for the application of the ECC for the existing Bach Street service station.</p>
<p><b>Pollution and Waste Management Bill (draft)</b></p>	<p>-This bill defines pollution and the different types of pollution. It also points out how the Government intends to regulate the different types of pollution to maintain a clean and safe environment.</p> <p>-The bill also describes how waste should be managed to reduce environmental pollution. Failure to comply with the requirements is considered an offense and is punishable.</p>	<p>-The project should be executed in harmony with the requirements of the act to reduce negative impacts on the surrounding environment from waste.</p> <p>-A waste management strategy that follows recycling, reuse and reducing should be commissioned throughout the project activities.</p> <p>-All waste should be handled by qualified waste handling contractors and disposed of at approved landfill.</p>

<b>South African National Standards SANS 10089-3</b>	<p>-Part 3: The installation of underground storage tanks, pumps/dispensers and pipe work at service stations and consumer installations is stated in SANS 10089-3.</p>	<p>-Service stations should be constructed according to the SANS standards.</p>
<b>Soil Conservation Act 76 of 1969</b>	<p>-This act makes provision for combating and prevention of soil erosion, it promotes the conservation, protection and improvement of the soil, vegetation, sources, and resources of the Republic of Namibia.</p>	<p>-Service stations are mainly associated with spillages which can end up contaminating the soil. This document aims at guiding the proponent during operation and perhaps decommissioning to prevent soil erosion and contamination of the soil.</p>
<b>Atmospheric Pollution Prevention Ordinance 11 of 1976</b>	<p>-This regulation sets out principles for the prevention of the pollution of the atmosphere and for matters incidental there to. Part III of the Act sets out regulations pertaining to atmospheric pollution by smoke. While preventative measures for dust atmospheric pollution are outlined in Part IV and Part V outlines provisions for Atmospheric pollution by gases emitted by vehicles.</p> <p>-The Act requires that there is a need to register a controlled area with certificate to operate air polluting activities. The retail license covers all elements and requirements of this Act.</p>	<p>-A retail license from the Ministry of Mines and Energy should be Acquired.</p>
<b>Water Act 54 of 1956</b>	<p>-The Water Resources Management Act 24 of 2004 is presently without regulations;</p>	<p>-Section 21(2) stipulates that purified effluent is to be returned as close as possible to the point of abstraction of the original water.</p>

	<p>therefore, the Water Act No 54 of 1956 is still in force:</p> <ul style="list-style-type: none"> <li>-A permit application in terms of Sections 21(1) and 21(2) of the Water Act is required for the disposal of industrial or domestic wastewater and effluent.</li> <li>-Prohibits the pollution of underground and surface water bodies (S23 (1)).</li> <li>-Liability of clean-up costs after closure/ abandonment of an activity (S23 (2)).</li> <li>-Protection from the surface and underground water pollution</li> </ul>	<ul style="list-style-type: none"> <li>-An approved waste handling contractor should collect water in the oil and water separator pits.</li> <li>-No wastewater should be disposed of into the environment.</li> </ul>
<p><b>Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.</b></p>	<ul style="list-style-type: none"> <li>-135 (f): "the steps to be taken by the owners of premises used or intended for use as factories or places where machinery is used, or by occupiers of such premises or by users of machinery about the structure of such buildings of otherwise to prevent or extinguish fires, and to ensure the safety in the event of a fire, of persons in such building;" (Ministry of Labour and Social Welfare).</li> <li>-This act emphasizes and regulates basic terms and conditions of employment, it guarantees prospective health, safety and welfare of employees and protects employees from unfair labour practices.</li> </ul>	<ul style="list-style-type: none"> <li>-As a requirement on site, a Safety and Health representative should be appointed.</li> <li>-The employer shall report all incidents occurring on site to the Ministry and accordance to the regulations.</li> <li>-The proponent should ensure securing a safe environment and preserving the health and welfare of employees at work. This will include applying appropriate hazard management plans and enforcing Occupational Health and Safety (OHS) enforcement by contractors.</li> </ul>
<p><b>Public Health and Environmental Act, 2015</b></p>	<ul style="list-style-type: none"> <li>-A person who intends to conduct on a premises activities which generate special, industrial hazardous or infectious waste must be registered for that purpose with the local authority concerned.</li> </ul>	<ul style="list-style-type: none"> <li>-The service station must be registered with City of Windhoek for a certificate of fitness.</li> </ul>

	<p>(3) A person or local authority engaged in activities contemplated in subsection (1) or (2) must ensure that the waste generated on the premises concerned is kept and stored (a) under conditions that causes no harm to human health or damage to the environment; and (b) In accordance with applicable laws.</p> <p>(4) All waste contemplated in this section must be stored in approved containers and for the maximum period determined by the head of health services or the chief health officer.</p>	
<p><b>Petroleum Products and Energy Act 13 of 1990</b></p>	<p>-The Act requires that for the operation of the service station, a retail license must be obtained from the relevant ministry.</p> <p>Adding on, the Act requires incident reporting of major spillages occurring on site for pollution control.</p>	<p>-The proponent is required to have a retail licence from Ministry of Mines and Energy.</p>
<p><b>Hazardous Substances Ordinance 14 of 1974 Sections 3 and 27</b></p>	<p>-Provisions for hazardous waste are amended in this act as it provides “for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; to provide for the prohibition and control of the importation, sale, use, operation, application, modification, disposal or dumping of such substance; and to provide for matters connected therewith”.</p>	<p>-The proponent shall separate waste at the site.</p> <p>-The proponent should ensure that all possible “hazardous” categorised substances and waste will be handled by a certified hazardous waste handler.</p>

	-The Act requires that a license must be obtained for the storage and distribution of a classified hazardous substance with the relevant Authority	
<b>Road Ordinance 1972 (Ordinance 17 of 1972)</b>	-Width of proclaimed roads and road reserve boundaries (S3.1) -Control of traffic during operational activities on the trunk and main roads (S27.1). -Infringements and obstructions on and interference with proclaimed roads. (S37.1) -Distance from proclaimed roads at which fences are erected (S38).	-The proponent should ensure compliance with the terms of the Road Ordinance.
<b>Nature Conservation Ordinance 4 of 1975 with amendments and special regulations</b>	-This ordinance prohibits "picking of indigenous plants in private nature reserves 24. (1) No person shall without the written approval of the Minister pick any indigenous plant, or any portion of an indigenous plant, in a private nature reserve: Provided that the owner of the land concerned may at any time pick any indigenous plant, other than a protected plant, on such land"	-The proponent should protect various species that have conservations status.
<b>National Biodiversity Strategy and Action Plan (NBSAP2)</b>	-The action plan was operationalised in a bid to make aware the critical importance of biodiversity conservation in Namibia, putting together the management of matters to do with ecosystems protection, biosafety, and biosystematics protection on both terrestrial and aquatic systems.	-The proponent should consider all associated impacts, both acute and long term, and mitigation measures should be implemented to sustain the local biodiversity.

## **INTERNATIONAL CONVENTIONS AND PROTOCOLS RELEVANT TO THE PROJECT**

It is vital to note that there are international conventions and protocols which aim to protect the environment to which Namibia is a signatory. These various international conventions and protocols which relate to the project are listed below:

- Vienna Convention for the protection of the ozone layer, 1985.
- United nations framework convention on climate change 1992.
- Convention of Biological Diversity (1992).
- African Convention on the Conservation of Nature and Natural Resources (1968)

## **SUSTAINABILITY PRINCIPLES RELEVANT TO THE PROJECT**

Apart from the above-mentioned regulatory framework, the following sustainability principles need to be taken into consideration, particularly to achieve proper waste management and pollution control.

### **CRADLE TO GRAVE RESPONSIBILITY**

This principle states that those who manufacture potentially harmful products should be liable for their safe production, use, and disposal. Those who initiate potentially polluting activities should be legally responsible for their commissioning, operation, and decommissioning.

### **PRECAUTIONARY RESPONSIBILITY**

This principle states that if there is any doubt about the effects of a potentially polluting activity, a cautious approach should be adopted.

### **THE POLLUTER PAYS PRINCIPLE**

A person who causes damage to the environment must pay the costs associated with rehabilitation of damage to the environment and to human health caused by pollution, including costs for measures as are reasonably required to be implemented to prevent further environmental damage.

## **7. ROLES AND RESPONSIBILITIES**

It is particularly important to outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. The proponent should also ensure the appointment responsible personnel's such as the Environmental Control Officer, Project Manager and Healthy and Safety officer to ensure the successful implementation of the EMP.

This section describes the roles and responsibilities of the key stakeholders involved in the development, implementation, and review of the EMP for this project.

### **7.1 COMPETENT AUTHORITY**

Ministry of Environment, Forestry and Tourism (MEFT): Department of Environmental Affairs and Ministry of Mines and Energy: Department of Petroleum affairs are the competent authorities for this project, and they are responsible for the review of the EMP and issue of the ECC.

### **7.2 PROPONENT**

- Responsible for all financial and manpower obligations to implement this EMP.
- The proponent should delegate suitable qualified person(s) with the responsibility to ensure implementation of the EMP.
- Protect the environment and rehabilitate the environment.
- Give warnings and impose fines and penalties on the contractor if the contractor neglects to implement the EMP satisfactorily.
- Make sure that a copy of the EMP is readily available on-site and that all site staff are aware of its content.
- Appointment of all personnel responsible for the implementation of the EMP.

### **7.3 FUEL SUPPLIER (PUMA ENERGY NAMIBIA (Pty) Ltd)**

- Comply to the cradle to grave responsibility and polluter pays principle.
- Supply fuel to the site.

## **7.4 APPOINTED CONTRACTOR**

- The contractor is responsible for the implementation of the EMP.
- Should be aware of any environmental matters as deemed necessary by the contractor.
- The contractor shall take adequate steps to educate all members of the workforce as well as supervisory staff on the relevant environmental laws and protection requirements as described in the EMP.
- Acquire a basic understanding of the key environmental features on the site and its immediate environs.
- Make sure that a copy of the EMP is readily available on-site and that all site staff are aware of its content.

## **7.5 PROJECT MANAGER**

- Liaising directly with the Environmental Control Officer (ECO) concerning the preparation and implementation of the EMP and meeting the conditions documented in the environmental clearance certificate.
- Bear the overall responsibility for managing the project contractors and ensuring that the environmental management requirements are met.
- Inform the contractors of the EMP and Environmental clearance certificate obligations.
- Approve all decisions regarding environmental procedures and protocols that must be followed.
- Have the authority to stop any activities in contravention with the EMP.
- In consultation with the Environmental Control Officer has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP.
- Maintain open and direct lines of communication between the proponent and Interested and Affected Parties (I&APs) about environmental matters.
- Attend regular site meetings and inspections where required.



## **7.6 ENVIRONMENTAL CONTROL OFFICER**

- Required to take independent responsibility of the implementation of this EMP.
- Conduct environmental monitoring as per EMP requirements.
- Monitor the performance of the contractors and ensure compliance with the EMP.
- Maintenance, update, and review of the EMP.
- Liaison between the contractor, authorities, and other key stakeholders on all environmental concerns.
- Conducting environmental incidents investigation as well as coming up with corrective and preventative actions.
- Communicate all amendments of the EMP to the relevant stakeholders.
- Conduct biannual audits to ensure that the system for implementing the EMP is effective.

## **7.7 HEALTH SAFETY AND ENVIRONMENTAL OFFICER (HSEO)**

- The HSEO should record and report all incidents on site.
- Ensure that safety is practiced for all activities on site.
- Prepare and implement safety procedures.
- Communicate all safety-related issues.
- Carry out any incident/accident investigations at the site
- Conduct training.
- Issuing PPE to employees.
- Conduct Safety Health and Environmental awareness inductions and at least the following topics should be covered, (the importance of complying with the relevant Namibian and International legislation, roles, and responsibilities including emergency preparedness, basic rules of conduct, the Do's, and Don'ts).

## 8. MANAGEMENT OF ENVIRONMENTAL IMPACTS

In this section, project potential impacts and their mitigation measures are stipulated. The proponent and all appointed contractors should ensure proper implementation of these measures.

### 8.1 POLLUTION MANAGEMENT

Most pollutants and hazards associated with service stations are caused by hydrocarbon fuels that are stored and handled on site. Potential hydrocarbon pollution impacts and mitigation measures are highlighted below:

#### 1. Surface soil and water contamination

Fuel spillages and leakages are the highest risks of pollution sources of soils and surface water contaminations at service stations. This type of contamination usually occurs during dispensing fuel into customers vehicles and when fuel tanker trucks offload fuel into the underground storage tanks. Over-filling of tanks, leaking and pipe bursts are the cause of most surface spillages.

Surface spillages if not contained can contaminate the surface soils. Soils contaminated by petroleum contaminants can affect soil health and harm soil microorganisms, reducing their number and activity. Surface spills can also contaminate surface water bodies as they can be washed into rivers and streams by floods and rain, thus can result in further underground water contamination.

#### Mitigation measures

- proper training of staff on fuel storage and handling.
- There should be a spill containment slab at forecourt and filler Points, covering the surfaces where fuels are handled to prevent groundwater pollution.
- Spillage control procedures must be in place according to SANS 10089-1:2008 and SANS 100131-2 standards, or better.
- contaminated soil shall be collected in a holding tray or drum, and which will then be disposed at a licensed hazardous waste site
- Spillages on site must be cleaned up immediately and if the spill is more than 200L it must be reported to the Ministry of Mines and Energy.
- An emergency response plan to give guidelines on spillages or leakages.
- All waste must be disposed of at approved disposal sites.
- No burial of any waste or burning should be done on-site.
- Sand buckets should be available on site to clean up minor oil spills.

- Standby oil cleaners and absorbents should be available during the decommission stage.
- All operational surfaces at the fuel retail facility must be installed with spill containment areas as per the relevant SANS standards (or better).

## **2. Underground contamination**

Underground fuel storage tanks and reticulation pipelines that carry fuel to the dispensing pumps have a risk of leaking, thereby polluting underground water. Oil spills and leakages may infiltrate underground, causing underground water contamination in the absence of a concrete containment slab.

### **Mitigation measures**

- proper training of staff and installation of suitable containment structures.
- Install oil interception system.
- Install isolating surface drainage system.
- There should be a spill containment slab at forecourt and filler Points, covering the surfaces where fuels are handled to prevent groundwater pollution.
- Storm water drainage system should be installed.
- Effluent testing should be done periodically to measure the quality of water from the oil and water separator to ensure that no contamination is being done to the environment.
- The condition of the fuel reticulation system should be checked regularly and repaired to prevent leakages.
- Monitoring wells should be installed to monitor possible oil leakages from underground tanks.
- All waste must be disposed of on approved disposal sites.
- All operational surfaces at the fuel retail facility must be installed with spill containment areas as per the relevant SANS standards (or better).

### **3. Hydrocarbon vapors and odors**

Hydrocarbon vapors can be released into the atmosphere when dispensing fuel into the customers vehicles and when tanker trucks are offloading fuel. Vapor contains elements such as benzene which is highly carcinogenic and may affect employees especially the fuel attendants due to prolonged exposure. Immediate atmospheric environment may be affected by fuel odors during refilling process.

#### **Mitigation measures**

- All venting systems and procedures should be designed according to SANS standards and placed in a sensible manner.
- Vent pipes should be placed in such a manner as to prevent impact on potential receptors.
- Vehicle idling time should be minimized by putting up educative signs.

## **8.2 WASTE MANAGEMENT**

Waste management involves the regular collection, transportation as well as processing and disposal or recycling and monitoring of different types of waste materials. Different types of waste can be generated at the service station such as general waste and hazardous waste.

### **1.General waste**

Bach Street service station generates waste mainly from the mini grocer and fast-food shop and the kitchen, therefore most of the general waste produced on site is domestic waste. Waste is generally in form of food leftovers, plastics, cigarette butts, waste dumped on site by motorists fuelling up. However, waste can also be in the form of human waste.

#### **Mitigation measures**

- Waste disposal systems should be implemented on site.
- Strictly no burning of waste on the site.
- Place whether and scavenger proof bins around the site.
- Contaminated wastes in the form of soil, litter, and other material must be disposed of at an appropriate disposal site at the nearest town.
- Good housekeeping should be maintained.

- Waste must be categorized by the contractor and disposed of in a suitable manner into different waste streams.
- No wastewater shall be disposed to soil.
- Waste should be disposed of at an authorized designated area.
- Proper ablution facility should be constructed on site.

## **2. Hazardous waste**

Hazardous wastes on site are usually minor oil spills on the surface. Spillages might occur during delivery to the tanks, overfilling of the tanks and vehicles. Hazardous waste should be separated from general waste and kept in hazardous waste bins to be discarded at approved disposal sites or should be handled by certified contractors.

### **Mitigation measures**

- Proper training of staff and the installation of suitable containment slab around the pumps and the filling points.
- Proper monitoring of the product levels in the tanks.
- All spills must be cleaned up immediately and if spill is more than 200 L, it must be reported to the Ministry of Mines and Energy.
- The presence of an emergency response plan and suitable equipment is advised, to react to any spillage or leakages properly and efficiently.
- Sand buckets should be available on the forecourt.
- Spill containment slab must be installed.
- Hazardous waste bins should be available on site to place contaminated waste.
- Equipment and materials to deal with spill clean-up such as spill kit must be readily available on site.
- Proper drainage, storm water free from pollution must be directed to a municipality drainage and contaminated water to the oil and water separator pit.

## 8.3 HEALTH AND SAFETY MANAGEMENT

The operations of fuel retail facility can cause serious health and safety risks to workers on site. Occupational exposures are normally related to the dermal contact with fuels and inhalation of fuel vapours during handling of such products, fire, and occupational stress.

### 1. Risk of fire explosion

Hydrocarbons are volatile under certain conditions and their vapours in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise.

No fire or any source of fire ignition is to be allowed at the service station during any of the two phases (operational and decommissioning). Puma Energy Namibia shall take all reasonable measures and active steps to avoid increasing the risk of fire through activities on site and prevent the accidental occurrence or spread of fire; and shall always ensure sufficient fire-fighting equipment on site.

### Mitigation measures

- Sufficient water should be made available on site for firefighting purposes.
- Ensure that all fire-fighting devices are in good working order.
- Regular inspections and services should be carried out to inspect and test firefighting equipment.
- All personnel must be sensitised about fire protection measures and good housekeeping such as the removal of flammable materials.
- All fire precautions and fire control at the fuel retail facility must be in accordance with SANS 10089-1:1999, or better.
- The Emergency Response Plan should be implemented.
- Signs for no smoking and mobiles, should be displayed on site.
- Fire guards must also be constructed at the site to prevent the spread of fires.
- Fuel tanks should be established away from potential neighbouring fire points.
- All fire precautions and fire control at the service station must be in accordance with SANS 10089-1:2008, or better.

## **2. Occupational health and safety**

The operations of fuel retail facility can cause serious health and safety risks to workers on site. Occupational exposures are normally related to the dermal contact with fuels and inhalation of fuel vapours during handling of such products, fire, and occupational stress.

### **Mitigation measures**

- Comply with all Health and Safety standards specified in the Labour Act.
- Train workers how to use the equipment safely and effectively
- Training on occupational health and safety.
- Safety talks to be done every day before the commencement of work.
- Emergency response plans should be present.
- Safety officer to be stationed at the site.
- Formulation of a safety health and environment workers committee.
- A fully stocked first aid kit should permanently be available on site as well as an adequately trained staff member in a position to administer first aid.
- All workers should have access to the appropriate Personal Protective Equipment (helmets, gloves, respirators, work suits, earplugs, safety goggles, and safety shoes where applicable).
- Proper ablution facility should be used and clearly marked for males and females.
- Use dust suppression measures.
- Maintain good housekeeping.
- Reduce noise exposure by isolating noisy equipment and rotate tasks.
- Conduct Hazard identification and risk assessments.
- Any leakage/spillage shall be immediately attended and provision of urgent cleaning.
- Work area should be monitored to maintain work environment free from any hazards.
- Provisions of immediate accident/incident reporting and investigation.
- Safety posters and signages should be exhibited at conspicuous places.

### **3. Risk and spread of HIV and AIDS**

The spread of HIV/AIDS may occur during the project operational phase. The movement of different people to the site can promote anti-social behaviours like alcohol abuse, drug abuse and prostitution. Workers may be given little time to visit their partners, as a result they may find new partners from the local area. Condoms may also be limited or not provided at the workplace.

#### **Mitigation measures**

- Allocate time for workers to visit their families.
- Sensitization campaign to the staff on HIV/AIDS and other STDs.
- Free distribution of condoms on site.
- Free counselling to those already affected by the virus.

### **8.4 CUMULATIVE IMPACTS**

These are the impacts on the environment, which result from the accumulation of other impacts which might occur during the operational phase. Fuel is going to be off-loaded from tanker trucks which can result in the release of hydrocarbon vapours, which have an impact of reducing the air quality and causing fires and explosions. If hydrocarbon vapours is released in the atmosphere, it can also cause global warming, reduction of photosynthesis of plants and cancer.

#### **Mitigation measures**

- All possible sources of ignition in the entire area should be eliminated.
- Sufficient water should always be available in case of fire for firefighting purposes.
- Vent pipes should be placed in such a manner as to prevent impact on potential receptors.
- Regular check tests.
- No burial of any waste or burning should be done on-site, all waste must be disposed of on approved disposal sites.
- Waste should be disposed of as hazardous waste at a licensed facility by an authorized hazardous waste handler.



## 8.5 POSITIVE IMPACTS

### 1. Employment creation

Employment will be created during the lifespan of the project. The types of jobs will range from skilled, semi-skilled and unskilled. This will improve the wealth and livelihood of people.

#### Enhancement measures

- levels in future. Employ locals in all casual labour in both phases.
- Gender equality, transparency should be ensured when recruiting.
- When recruiting, the responsible contractor should ensure gender equality.
- Implementation of training programs to train the unskilled workers for them to enhance their performances and to gain more knowledge that they might demonstrate at other

### 2. Generation of revenue

According to the law of Namibia, operating companies are to pay taxes. It is a requirement that the proponent will pay tax to the government hence this will benefit the nation at large given that money generated from taxes is diverted to the public by the government.

#### Enhancement measures

- Continuous payment of taxes as regulated in the Namibian laws.

### **3. Local development and improvement of general welfare**

The service station can pave way for development of the area. Project investors are believed to bring development to communities where they are operating as a form of enhancing social responsibility. The project has a high probability of improving the general welfare for the local population. The locals will benefit during the life span of the project and the extent of benefiting can reach to the regional scale.

#### **Enhancement measures**

- First preference is to be given to the locals during employment.
- The proponent is to be engaged in community projects.
- The proponent should give employees market related salaries; this will improve the lives of the employees.
- The proponent should be engaged in community development programmes

### **4. Accessibility of fuel**

The community people will have access to fuel and no need to travel long distance to fill up their vehicles. The probability of fuel supply is going to be definite; the severity will be greatly beneficial, and the overall significance will be very high.

#### **Enhancement measures**

- Maintain a consistent supply of the fuel to site.

## 9. ENVIRONMENTAL MONITORING

Environmental monitoring provides a delivery mechanism to address the adverse environmental impacts of a project during its lifespan and to introduce standards of good practice to be adopted. The aim of environmental monitoring is to manage and minimize the impact a project's activities have on the environment, either to ensure compliance with laws and regulations or to mitigate risks of harmful effects on the natural environment and protect the health and safety of human beings

The critical potential project impacts that can have adverse impacts on the environment include surface and underground contamination, hydrocarbon vapors and odors, general waste, hazardous waste, risk of fire explosion and occupational health and safety.

The suggested monitoring details are outlined in the table below.

**Table 4:** Monitoring of sensitive impacts

IMPACT	TYPE OF MONITORING	MONITORING FREQUENCY
<b>Surface soil and water contamination</b>	<ul style="list-style-type: none"> <li>• Proper spill clean-up.</li> <li>• Fuel reconciliation</li> </ul>	Daily
<b>Underground contamination</b>	<ul style="list-style-type: none"> <li>• Vacuum testing on underground fuel tanks.</li> <li>• Inspection on underground possible leakages.</li> <li>• Monitoring of the oil/water separator</li> </ul>	Regularly
<b>Hydrocarbon vapors and odors</b>	<ul style="list-style-type: none"> <li>• Proper PPE always.</li> <li>• Air quality tests</li> </ul>	Daily Bi-annually
<b>General waste</b>	<ul style="list-style-type: none"> <li>• Disposal of waste bins.</li> </ul>	Daily
<b>Hazardous waste</b>	<ul style="list-style-type: none"> <li>• Site inspections of oil spills.</li> <li>• Proper spill clean-up.</li> <li>• Site inspection of housekeeping.</li> </ul>	Daily Regularly

	<ul style="list-style-type: none"> <li>• Proper training of fuel attendants.</li> </ul>	
<b>Risk of fire explosion</b>	<ul style="list-style-type: none"> <li>• Regular testing and servicing of firefighting equipment.</li> </ul>	Regularly
<b>Occupational health and safety</b>	<ul style="list-style-type: none"> <li>• Conducting hazard and risk Assessments.</li> <li>• Safety procedures evaluation.</li> <li>• Health and safety incident monitoring.</li> <li>• Security inspection on site.</li> <li>• Regular supply of appropriate PPE to employees.</li> </ul>	Daily and when necessitated

As stipulated in the EMA no.7 of 2007 and its Regulations of 2012, biannual monitoring and evaluation should be conducted by an independent EAP to monitor and evaluate the environmental performance of the project. Target of improvements should be established and monitored. **See appendix A for environmental monitoring and evaluation report.**

## 10. DECOMMISSIONING AND SITE CLOSURE

It is necessary to consider the environmental impacts of decommissioning of any development, even though the decommissioning phase of the project is not known yet. Decommissioning phase is considered as a separate activity which should be dealt with on its own. It would therefore be addressed in an EIA to be conducted prior to the site closure.

During the decommissioning phase of the project, the following recommendations should be considered:

- The proponent should develop a site closure plan to be updated on an annual basis at least 5 years or more prior to envisaged decommissioning.
- The closure plan should outline rehabilitation methods for the site closure.
- The proponent should consider specialist input to provide direction on the closure plan to ensure best practice.
- Various stakeholders should be engaged as early as possible in the closure planning to ensure that their inputs are considered.
- The environmental commissioner should grant a successful rehabilitation for decommissioning to be considered complete.

### **Other recommendations are listed below:**

- Removing of equipment on site.
- Removal of associated infrastructures.
- Rehabilitation of all areas impacted by the associated infrastructures.
- Planting of vegetation on site.

## **11. CONCLUSION**

This EMP is considered sufficient for continuous operations of the existing Bach Street service station. Proper implementation of this EMP will help to minimise adverse impacts on the environment and Where impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts.

The Environmental Management Plan should be used as an on-site reference document during the operation phase. Puma Energy Namibia and appointed contractors should take all necessary actions to implement the EMP to minimise adverse impacts on the environment. All Contractors and sub-Contractors taking part in the project should be made aware of the content of the EMP and plan their activities accordingly in an environmentally sound manner.

Environmental monitoring should be conducted to determine environmental performance of the project. Evaluation of monitoring processes should be reviewed regularly to enhance performance. Parties responsible for the transgression of the EMP should be held responsible on any non-compliance, and rehabilitation should be enforced.

## 12. REFERENCES

- I. Government of Namibia. (2008). Government Gazette of the Republic of Namibia. Government notice No.1: Regulations for Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA)-Windhoek.
- II. Government of Namibia. (2012). Environmental Management Act no. 7 of 2007. Windhoek: Directorate of Environmental Affairs, Ministry of Environment and Tourism.
- III. Guide to the Environmental Management Act No 7 of 2007(2008). Windhoek, Namibia: Ministry of Environment and Tourism.
- IV. Schlüter, T. (2006). Namibia. *Geological Atlas of Africa: With Notes on Stratigraphy, Tectonics, Economic Geology, Geohazards and Geosites of Each Country*, 172-175



## 13. LIST OF APPENDICES



## **Appendix A: Environmental Monitoring and Evaluation Report**

# ENVIRONMENTAL MONITORING AND EVALUATION REPORT FOR THE OPERATIONS OF THE EXISTING BACH STREET SERVICE STATION IN WINDHOEK, KHOMAS REGION



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**Appendix A:** Site location map

**Appendix B:** Retail licence

**Appendix C:** Other relevant documentation

**Appendix D:** CV of EAP

## **1.INTRODUCTION**

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An environmental monitoring and evaluation provides a delivery mechanism to address adverse impacts that a project's activities may have on the environment during its operation and decommissioning phase. An environmental monitoring assists in detecting the development of any unwanted environmental situation and enhancing project compliance with relevant policies, acts and regulations so that the project continues to operate in an environmentally sound manner.

Bach Street service station was constructed before the Environmental Management Act No.7 of 2007 came into effect; hence it has been operating without an Environmental Clearance Certificate (ECC). Puma Energy Namibia therefore intends to regularize the operation of the existing Bach Street service station in accordance with Section 9 of the Environmental Management Act No. 7 of 2007.

### **Request for Environmental Clearance and Environmental Management Plan (this report) –**

The following environmental monitoring and evaluation report was compiled by Nam Geo-Enviro Solutions (NGS) on behalf of Puma Energy Namibia to assess the current environmental conditions on site and to apply for an ECC for the continuous operations of the existing Bach Street service station in Windhoek.

Nam Geo-Enviro Solutions has thus also compiled an Environmental Management Plan (EMP) for the service Station that will be used as a site-specific plan to manage adverse impacts of the project.

Detailing environmental impacts of the existing facilities, assessment of existing controls and recommendations for environmental management to ensure the project continues its operations in an environmentally sound manner.

## **1.1 Listed activities**

According to the Environmental Management Act (2007) and its Regulations (2012) the existing development requires an Environmental Clearance Certificate as specified in the following sections of the Act outlined in Table 1 below.

**TABLE 1: LISTED ACTIVITIES RELEVANT TO THE PROJECT**

<b>ACTIVITY</b>	<b>RELEVANT SECTIONS</b>
<b>9.</b> Hazardous substance treatment, handling, and storage	<p><b>9.2</b> Any process or activity which requires a permit, licence or other forms of authorization, or the modification of or changes to existing facility for any process or activities which requires and amendment of an existing permit, licence, or authorization or which requires a permit, licence, or authorization in term of a law governing the generation or release of emission, pollution, effluent, or waste.</p> <p><b>9.4</b> The storage and handling of dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.</p> <p><b>9.5</b> Construction of filling stations or any other facility for the underground or aboveground storage of dangerous goods including petrol, diesel, liquid, petroleum, gas, or paraffin.</p>

## 2. OBJECTIVES

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- Provide a detailed description of existing site infrastructure and activities.
- Conduct a comprehensive and all-encompassing legislative and other requirements assessment based on the proposed activities.
- Consider the potential environmental and social impacts of the operations and decommissioning of the existing fuel station.
- Identification of any mitigation action to be taken to minimize predicted adverse impacts and provide associated costs where applicable and practical. This will include the development of an environmental monitoring plan which will ensure that the mitigation measures are adhered to during the operation and decommissioning phases of the project.
- Compile an Environmental Management Plan (EMP) to minimize and/or mitigate potentially negative impacts for the continuing operations of the service station.

## 3. ENVIRONMENTAL MONITORING AND EVALUATION METHODOLOGY

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The methodology adopted for this monitoring included.

- Physical inspections of environmental aspects in relation to the operational site and its installation.
- Assessment of standard pollution mitigation measures implemented on site
- Assessment of health and safety measures in place
- Assessment of legal compliance with relevant laws, regulations, and by-laws

A physical inspection of the site was conducted on 06<sup>th</sup> October 2022.

## 4. PROJECT DESCRIPTION

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Bach Street service station is located on Erf 8029, Bach Street, in Windhoek West, Khomas region. The site falls in the following geographic coordinates: S 22.565617; E 17.068717. **See appendix A** for site location map.

**The service station currently operates the following facilities on site:**

- Operation of fuel retail facilities to public.
- Distributor bottled LPG gas to public
- A mini grocer and fast-food shop (Puma Express shop)
- A car wash.

#### **4.1 Fuel storage tanks and installation details currently on site**

Installations at Bach Street service station consists of five (5) underground fuel tanks, of which three are Petrol (ULP 95) and two diesel tanks (50ppm).

Table 2 below indicates the fuel storage and installation details on site.

**TABLE 2: FUEL STORAGE AND INSTALLATION DETAILS ON SITE**

<b>FUEL STORAGE DETAILS</b>					
<b>Tank no:</b>	<b>T1</b>	<b>T2</b>	<b>T3</b>	<b>T4</b>	<b>T5</b>
<b>Product (petrol/diesel)</b>	Petrol	petrol	petrol	diesel	diesel
<b>Capacity (L)</b>	23000L	23000L	23000L	23000L	23000L
<b>Type of material (AG-aboveground UG: underground)</b>	UG	UG	UG	UG	UG
<b>INSTALLATIONS</b>					
<b>No. of islands</b>	6				
<b>No. of pumps</b>	12				
<b>No. of dispensers</b>	24				
<b>Oil &amp; water interceptor on forecourt</b>	Available				
<b>Oil &amp; water interceptor on filler points</b>	Available				
<b>Oil &amp; water separator pit</b>	Available				
<b>Leak detection wells</b>	Available				
<b>Spill containment slab</b>	Available				



## **5. POLICY AND LEGISLATORY COMPLIANCE**

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This section outlines the legislative compliant requirements that the service station is required to comply to in respect to acquiring an Environmental Clearance Certificate (ECC).

Table 3 below outlines relevant policies, acts and regulations to the project and its compliance status to the relevant guidelines and standards.

**TABLE 3: LEGAL AND OTHER REQUIREMENTS COMPLIANCY APPLICABLE**

Aspect	Legislation	Type of Requirement	Compliance Status	Comments
Environmental	Namibian Constitution First Amendment Act 34 of 1998	The constitution requires sustainable utilisation of natural resources basis for the benefit of all Namibians, both present and future.” (Article 95(I)).	<b>Compliant</b>	-Fuel sold at the service station is imported therefore natural resources are not affected. However, there is need for continuous monitoring, so as to prevent groundwater contamination.
	Environmental Management Act 7 of 2007	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27).	<b>Non-Compliant</b>	-The Service Station is operating without an Environmental Clearance Certificate (ECC) because the site was already existing before the EMA (2007) came into force, hence with this application, Puma Energy Namibia seeks to comply with the Act.
	Pollution and Waste Management Bill (draft)	All waste has to be handled by qualified waste handling contractors and disposed of on approved sites.	<b>Compliant</b>	-General waste is collected by Municipality. -Hazardous waste is handled by a certified contractor.
Soil	Soil Conservation Act 76 of 1969	Section 3 (n) of the Act guards against erosion, denudation, and any forms of pollution to	<b>Compliant</b>	-The following has been implemented as a way to prevent soil pollution on site:

		the soil. Accordingly, the operations of the service station should not result in the pollution or erosion or degradation of the soil around		<p>a) Spill containment slab and paving of the surrounding area to avoid erosion.</p> <p>b) Oil/water separator pits to collect spills and wash-offs from fuel handling areas</p>
Air	Atmospheric Pollution Prevention Ordinance 11 of 1976	The Act requires that there is need to register a controlled area with certificate to operate air polluting activities. The retail license covers all elements and requirements of this Act.	<b>Compliant</b>	-The Service station has obtained a retail license from Ministry of Mines and Energy having met required construction standards. <b>See appendix B</b> for retail licence.
Water	Water Act 54 of 1956	A discharge license for wastewater from the oil and separator pit has to be obtained. Section 21(2) stipulates that purified effluent is to be returned as close as possible to the point of abstraction of the original water.	<b>Compliant</b>	<p>- Oil and water separator pits purifies water from hydrocarbons pollution.</p> <p>-A certified contractor is contracted to clean the oil/water separator pits</p>
	Water Resources Management Act No 24 of 2004 (still to be enforced)	The act looks at protection of underground water resources and continuous monitoring of water quality in the presence of potentially polluting activities.	<b>Partially compliant</b>	-There is need for periodic sampling/monitoring of groundwater water on site.

Health and Safety	Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.	<p>-As a requirement on site, a Safety and Health representative on site has to be appointed.</p> <p>-The employer shall report all incidents occurring on site to the Ministry and accordance to the regulations.</p>	<b>Compliant</b>	<p>-There are trained OHS representatives on site.</p> <p>-All accidents and incidents are investigated and recorded in the incident register.</p>
	Public Health and Environmental Act, 2015	<p>-(1) A person who intends to conduct on a premises activity which generate special, industrial, hazardous, or infectious waste must be registered for that purpose with the local authority concerned</p> <p>-(3) A person or local authority engaged in activities contemplated in subsection (1) or (2) must ensure that the waste generated on the premises concerned is kept and stored</p> <p>(a) under conditions that causes no harm to human health or damage to the environment; and</p>	<b>Compliant</b>	<p>-The Service station is registered with City of Windhoek and all waste is managed in accordance to the provisions of the City of Windhoek By-Laws</p>

		(b) In accordance with applicable laws. (4) All waste contemplated in this section must be stored in approved containers and for the maximum period determined by the head of health services or the chief health officer		
Oil and Gas	Petroleum Products and Energy Act 13 of 1990	-The Act requires that for the operation of the Service station a retail license has to be obtained from the relevant ministry -Adding on the Act requires incident reporting of major spillages occurring on site for pollution control.	<b>Compliant</b>	-Bach Street Service Station is authorised to sell petroleum products. -A spill register is kept in place to record and report all accidental spillages on site.
	Hazardous Substances Ordinance 14 of 1974 Sections 3 and 27	The Act requires that a license has to be obtained for the storage and distribution of a classified hazardous substance with the relevant Authority.		-Labelling of all Hazardous containers and or facility on site with danger or warning signs.

SANS/SABS	South African National Standards (SANS) 10089-3 of 2010.	SANS 10089-3 highlights on the following: The installation, modification and decommissioning of underground storage tanks, pumps/dispensers and pipework at service stations and consumer installations. Additionally, the following items are also highlighted: fire precautions & fire control in bulk depots, protection & welfare of personnel, maintenance of & extension to the Service Station, pollution control and transportation of petroleum products by road & by rail.	<b>Compliant</b>	Bach Street service station is constructed, and it is operating according to SANS standards
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## **6.ASSESSMENT OF ENVIRONMENTAL IMPACTS AND MEASURES CURRENTLY IMPLEMENTED ON SITE**

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This section outlines the impacts associated with fuel storage and handling on site and their current mitigation measures implemented on site.

### **6.1. On site pollution management**

Most pollutants and hazards associated with service stations are caused by hydrocarbon fuels that are stored and handled on site. Possible hydrocarbon pollution impacts on site are highlighted below:

#### **Surface water and soil contamination**

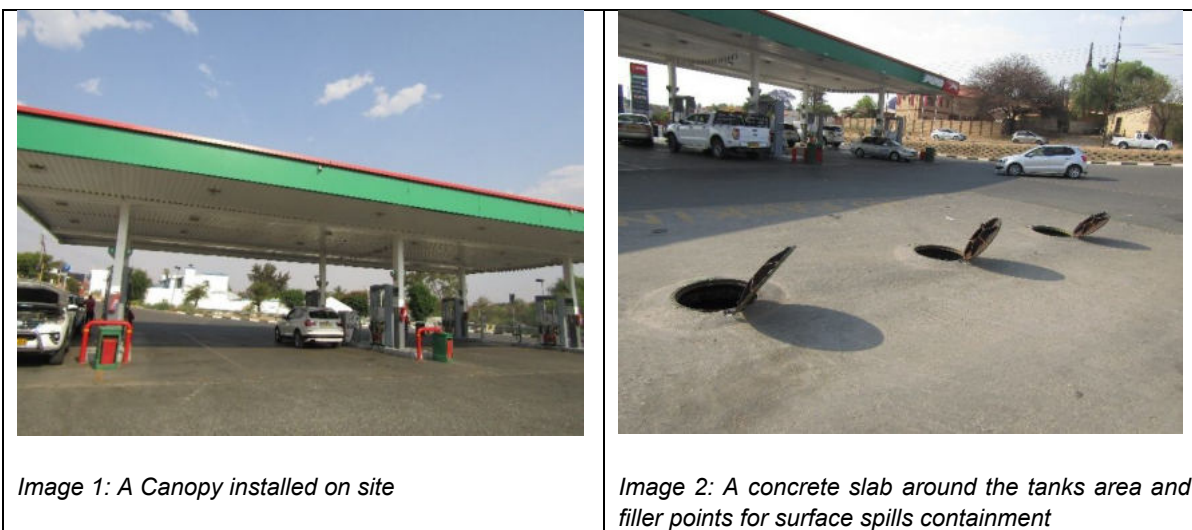
Fuel spillage and leakages are the highest risks of pollution sources of soils and surface water contaminations at service stations. This type of contamination usually occurs during dispensing fuel into customers vehicles and when fuel tanker trucks offload fuel into the underground storage tanks. Over-filling of tanks, leaking and pipe bursts are the cause of most surface spillages.

During the site assessment, minor oil stains were observed around the vehicle dispensing pump area. surface spillages if not contained can contaminate the surface soils. Soils contaminated by petroleum contaminants can affect soil health and harm soil microorganisms, reducing their number and activity. Surface spills can also contaminate surface water bodies as they can be washed into rivers and streams by floods and rain, thus can result in further underground water contamination.

#### **Current mitigation measures implemented on site**

- A concrete containment slab covering the forecourt and off-loading areas where pumping activities occur to contain the spills and prevent them from penetrating to underground.
- The service station has a canopy to prevent rain from washing of spills into surface water bodies and prevent surface water contamination.
- Spill register to record major spills and leakages is kept on site.

See photos in figure 1 below of surface pollution control measures currently on site



**FIGURE 1:** SURFACE POLLUTION CONTROL MEASURES CURRENTLY ON SITE

## **Underground contamination**

Spillages in the form of petrol and diesel products can be generated during refuelling of fuel into customer vehicles. Fuel spillages can also be produced on site during off-loading of fuel into the storage tanks at the filler points. Furthermore, leakages can occur from possible damages to underground tanks and pipes which can consequently contaminate groundwater.

### **Current mitigation measures implemented on site**

- There is a concrete slab covering the surface where fuels are handled to prevent fuel from infiltrating underground and contaminating undergroundwater.
- Oil & water interceptors at filler points to collect wastewater and oil spills from the forecourt and offloading to the oil & water separator pits that are installed on site.
- The site is surrounded by interlocks to minimize surface and underground contamination

See photos in figure 2 below of underground pollution control measures currently on site.





*Image 1: Oil and water interceptor to collect wastewater and oils from the forecourt to the water and oil separator pits*



*Image 2: Oil and water separator pits emptied regularly by certified contractors.*



*Image 3: Minor oil spills on site, sand is used as an absorbent to clean up minor spills*



*Image 4: Interlock surrounding the site*

**FIGURE 2: UNDERGROUND POLLUTION CONTROL MEASURES CURRENTLY ON SITE**

## Hydrocarbon vapours and odours

Dispensing of fuel into vehicles can produce hydrocarbon gases. Prolonged exposure to these hazardous gases can result into inhalation which can consequently cause carcinogenic diseases. In addition, physical contact with fuel can have health effects on people. Immediate atmospheric environment may be affected by fuel odors during refilling process

### Current mitigation measures implemented on site

- Vent pipes have been installed on site (at least 3m high) to release vapors above the immediate atmosphere to enhance pollution attenuation.
- Two working shifts a day to prevent workers from prolonged exposure to hydrocarbon vapors.

See photos in figure 3 below of hydrocarbon vapours and odours pollution control measures currently on site



*Image 1: Vent pipes have been installed on site (3m) to release vapors above the immediate atmosphere to enhance pollution attenuation.*

**FIGURE 3:** HYDROCARBON VAPOURS AND ODOURS POLLUTION CONTROL MEASURES CURRENTLY ON SITE

## **6.2 On site waste management**

Waste management involves the regular collection, transportation as well as processing and disposal or recycling and monitoring of different types of waste materials. Different types of waste can be generated at the service station such as general waste and hazardous waste.

### **General waste**

General waste on site is produced mainly by customer in form of plastics, papers, cigarette butts and bottles of cool drinks from the shop. Waste is also generated from the kitchen.

### **Current mitigation measures implemented on site**

- General Waste is collected by Municipality.
- Waste disposal bins are available.
- Good housekeeping is maintained.

See photos in figure 4 below of general waste pollution control measures currently on site



*Image 1: waste bins on site*



*Image 2: Good housekeeping*

**FIGURE 4:** GENERAL WASTE POLLUTION CONTROL MEASURES CURRENTLY ON SITE

## **Hazardous waste**

Hazardous wastes on site are usually minor oil spills on the surface. Hazardous waste should be separated from general waste and kept in hazardous bins to be discarded at approved disposal sites or should be handled by certified contractors.

During the site assessment, no hazardous waste management measures were observed.

## **6.3 Fire and safety management**

The monitoring and evaluation also focused on the health and safety of the workers.

Hydrocarbons are volatile under certain conditions and their vapours in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise.

No fire or any source of fire ignition is to be allowed at the service station during any of the two phases (operational and decommissioning). Puma Energy Namibia shall take all reasonable measures and active steps to avoid increasing the risk of fire through activities on site and prevent the accidental occurrence or spread of fire; and shall always ensure sufficient fire-fighting equipment on site.

### **Current mitigation measures implemented on site**

- Firefighting equipment are present at the Service Station and in good working condition.
- Safety signs forbidding smoking, use of cell phones, use of explosives etc, are displayed.
- Water is available at the Service Station.
- A first aid kit is available on site
- Workers have personal protective clothing (PPE).
- Staff are trained on handling of fuel and firefighting.

See photos in figure 5 below of fire and safety control measures currently on site.



*Image 1: one of the fire extinguishers on site.*



*Image 2: safety signs forbidding smoking, switching off running engines and no cell phone usage during filling up.*



*Image 3: workers personal protective clothing (safety boots, overall)*



*Image 4. Hose pipe on site*

**FIGURE 5: FIRE AND SAFETY CONTROL MEASURES CURRENTLY ON SITE**

## 7.MONITORING OUTCOMES AND RECOMMENDATIONS

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### Monitoring Outcomes

The focus of this monitoring and evaluation report is on key environmental and legislative compliance in respect to the service station's operations. Compliance was categorized as follows:

- a. Non-Compliance (NC)
- b. Partial compliance (PC)
- c. Compliant(C)

TABLE 4:MONITORING OUTCOMES

IMPACT	COMPLIANCE STATUS	COMMENTS
Surface water and soil contamination	<b>C</b>	-A canopy installed, concrete spill containment slab on site.
Underground contamination	<b>C</b>	-oil and water separator pits available on site and cleaned by a certified contractor.
Risk of fire explosion	<b>C</b>	-warning signs on use of explosives on site displayed, fire extinguishers, hose pipes.
Hydrocarbon vapours and odours	<b>C</b>	-Vent pipes installed on site.
Health and safety	<b>C</b>	-First aid kit and PPE.
Hazardous waste	<b>PC</b>	-There are no hazardous waste bins at the site. -No oil absorbents on site.
General waste	<b>C</b>	-Water proof waste bins available, waste is collected by municipality.

## **RECOMMENDATIONS**

- Hazardous waste should be separated from general waste, the service station should have hazardous waste bins on site.
- Installation of monitoring wells to detect underground tank leakages.
- Adequate supply of absorbents (sand) on site.
- A clear and detailed fire emergency response plan should be implemented on site and known by all employees.

## **8. CONCLUSION**

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The environmental monitoring and evaluation findings indicate that the service station is compliant with most of the relevant acts and regulations. Installations on site are according to SABS/SANS standards which complies with our national and international standards for service station construction. However, there is a need for installation of monitoring wells to detect underground tank leakages. The critical potential impacts of the project include surface and underground contamination, hydrocarbon vapours and odours, risk of fire explosion, hazardous waste, and general waste. The critical potential impacts of the project include surface and underground contamination, hydrocarbon vapours and odors, risk of fire explosion and general waste.

The compiled Environmental Management Plan (EMP) should be used as an on-site reference document during operation and perhaps decommissioning phase. Where impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts.

**NOVEMBER 2022**

## **9. REFERENCES**

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I. Constitution of the Republic of Namibia (1990).

II. Environmental Management Act (2007).

III. Petroleum Products and Energy Act of Namibia (1990)

IV. South African National Standard 10089 (2010).

V. Water Resources Management Act 11 (2013).



## **10. LIST OF APPENDICES**

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## **Appendix A: Site location map**



Nam  
**Geo-Enviro**  
Solutions

**BACH STREET SERVICE STATION**  
S-22.565617, E 17.068717  
**WINDHOEK**  
**KHOMAS REGION**

**COORDINATE SYSTEM: GCS WGS 1984**  
**DATUM: WGS 1984**  
**UNIT: DEGREE**

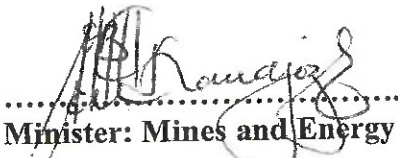

## **Appendix B: Retail licence**



MINISTRY OF MINES AND ENERGY  
PETROLEUM PRODUCTS AND ENERGY ACT, 1990  
PETROLEUM PRODUCTS REGULATIONS (2000)

RETAIL LICENCE

[Regulation 5(4)]

<b>RETAIL LICENCE</b>		<b>Licence No. R/316/2015</b>	
<b>Name of licence-holder</b>	Bach Street Service Station CC		
<b>Address of licence-holder</b>	<b>Physical Address</b>	<b>Postal Address</b>	
	No: 71 – 77 Bach Street	P.O.BOX 22863 Windhoek	
<b>Name of Retail Outlet</b>	Bach Street Service Station CC		
<b>Name of Supplying Wholesaler</b>	Puma Energy Namibia (Pty) Ltd		
<b>Premises to which licence relates</b>	21 – 77, Bach Street, Windhoek West		
<b>Conditions applicable to licence</b> <i>See overleaf of page for general and special conditions applicable to licence.</i>			
<b>Date of issue of licence</b>	19 October 2015		
<b>Issued by the Minister of Mines and Energy in terms of regulations 5(4), on</b> 19 October 2015 at Windhoek			
 ..... Minister: Mines and Energy			

**Appendix C: Other relevant documentation**  
(Certificate of Fitness)



### CERTIFICATE OF FITNESS / REGISTRATION

REF NO: 2021/027275/248214

This is to certify that the premises as described hereunder is registered in terms of the General Health Regulations (G.N. 121 of 1969 as amended), Regulations Relating to the Registration of Businesses GN 202 of 2006, the Informal Trading Regulations 200 of 2007 and The Liquor Act, 1998 (Act No. 6 of 1998) for carrying on a business as stipulated.

**TRADE NAME:** BACHT STREET SERVICE STATION CC

**ERF NO:** 8029

**TOWNSHIP:** WINDHOEK/WINDHOEK BLOCKS

**STREET NAME:** DR. KUAIMA RIRUAKO STR

**OWNER/MANAGER:** DAMON, J. A  
ID: 56061410026

**PO BOX:** 22863, WINDHOWK

**TELEPHONE:** 0811245707

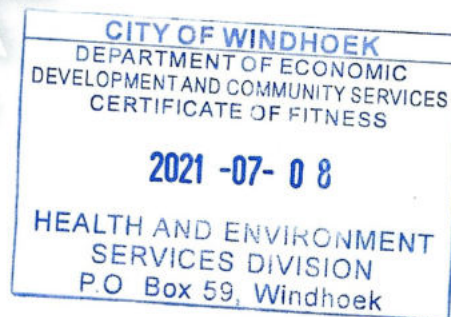
**CITY:** WINDHOEK

**MEDICALS:** 0

**NATURE:** FILLING STATION

**RESTRICTED TO:** FILLING STATION

**THIS CERTIFICATE EXPIRES ON:** 2022-08-18



*[Signature]* City of Windhoek *[Signature]*

SECTION HEAD: BUSINESS  
REGISTRATION  
DATE: 2021-07-08

CHIEF: HEALTH SERVICES  
DATE: 2021-07-08

*The Gateway to Endless Opportunities*

## **Appendix D: CV of EAP**





### Occupation

- Environmental officer

### Education

- Bachelor of Science (Environmental Biology)  
Honours degree (University of Namibia)

## NDAPANDA HASHOLO

### Key Experiences:

- Environmental Assessment & Management
- Ecology, Climate & Livelihoods
- Project Planning and Management

### Project Experience

#### **2022- Environmental Impact Assessment**

-Construction and operation of an abattoir for a piggery on Farm Oribib in Outjo, Kunene Region, Namibia.

#### **2022- Environmental monitoring and evaluation**

-Operation of existing Solar Plant in Roshpinah, Karas Region, Namibia.



Nam  
Geo-Enviro  
Solutions

## EMPLOYMENT RECORD

2022-Present Nam Geo-Enviro Solutions      Environmental Officer  
2022 - Nam Geo-Enviro Solutions              Environmental Intern

### CERTIFICATION

I, the undersigned, certify that to the best of my knowledge and belief, this CV correctly describes myself, my qualifications, and my experience. I understand that any willful misstatement described herein may lead to my disqualification or dismissal, if engaged.

N. Hasholo

Date: 23 September 2022

Signature of staff member or authorized representative of the staff