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ENVIRONMENTAL AUDIT REPORT

FOR THE

EXTENSION OF A CAR PARK AT KOEBERG NUCLEAR
POWER STATION ON CAPE FARM 1552,
DUYNEFONTYN CAPE TOWN.

PREPARED FOR: ESKOM HOLDINGS SOC LIMITED
Koeberg Nuclear Power Station
R27 Off West Coast Road
Melkbosstrand

DATE: January 2021

REPORT NO: ECO/Koe/01/2021

DEA EIA REF NO: 14/12/16/3/3/1/1687

COPY TO: ESKOM: Deon Jeannes (Nuclear Environmental Manager), Jana Klopper (Power station EO / environmental manager), Jurina Le Roux (Nature reserve EO / manager)
GRIDBOW Project Team



PROJECT DETAILS

TITLE: The extension of a car park at Koeberg Nuclear Power Station on Cape Farm 1552, Duynefontyn, Cape Town.

LOCATION: Koeberg Nuclear Power Station
R27 Off West Coast Road
Melkbosstrand

ENVIRONMENTAL CONSULTANCY: Sharples Environmental Services cc.

PRIMARY ECO & AUTHOR: Mr Lloyd Barnes (ECO)

EXPERTISE: Lloyd has a Bachelor of Technology Degree and Diploma in Environmental Management from the Cape Peninsula University of Technology in 2016. He has 3 years' experience in the environmental field, including the extensive auditing of several open-cast mines, basic environmental assessments, on-site compliance monitoring, environmental management plans, maintenance management plans and business sustainability. In his time as a consultant, he has compiled a number of environment audits and management plans for a range of developments.

CHECKED AND APPROVED BY: Ms Betsy Ditcham (Supervising ECO)

EXPERTISE: Betsy has a Bachelor of Science Honours Degree in Wildlife Management from the University of Pretoria and a Bachelor of Science Degree (Zoology and Ecology) obtained from the University of Cape Town in 2005. She has 9 years' experience in the environmental field, including environmental assessments, legal compliance, on-site compliance monitoring, cleaner production and business greening and sustainability (carbon and environmental footprinting). In her time as a consultant, she has compiled a number of environment assessments and management plans for both private and governmental clients. Betsy is co-owner of SES and is registered with EAPASA (Reg no. 1480)

CLIENT: ESKOM HOLDINGS SOC LIMITED

REPORT CLASSIFICATION: Environmental Audit Report.

SES REFERENCE NUMBER: ECO/Koe/01/21

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| | |
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| Section | |
| 1 | Introduction |

Sharples Environmental Services cc (SES) has been appointed by Gridbow Engineers & Technical Services on behalf of *ESKOM HOLDINGS SOC LIMITED* (the client), as the Environmental Control Officer (ECO) to monitor the construction of a new car park at Koeberg Nuclear Power Station (KNPS) on Cape Farm 1552, Duynfontyn, Cape Town. SES has been appointed to undertake monitoring inspections for the duration of the contract period, to ensure that measures outlined in the Environmental Management Programme (EMPr) are implemented and that environmental degradation is kept to a minimum. This report has been compiled to indicate compliance with the Environmental Authorisation (EA) issued by the Department of Environmental Affairs (DEA) the EMPr compiled by *Advisian* (dated 5th of May 2017).

Environmental Authorisation was granted by DEA on July 11th, 2017.

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| Section | |
| 2 | Description of Activity |

The proposed project is a two Phased project. Phase 1 includes the maintenance of the entrance road off the R27 towards ACP1. Phase 2 encompasses the expansion of the existing car park area.

KNPS performs a refuelling outage approximately every 18 months on each unit (i.e. between one and two outages per year). The outage duration is between 1 and 3 months depending on the work scope. The current car park facilities are inadequate to support the additional outage workforce.

Additionally, to ensure continued operation of the KNPS until 2045, major refurbishment and maintenance of the facility and its associated infrastructure is a necessity. During these major planned maintenance periods, even higher numbers of additional staff and contractors are required on site for the successful completion of these activities. To accommodate the increase in staff and contractor numbers during these outage periods, Eskom has proposed an extension to an existing car park located on the KNPS site (Refer to Figure 2). This project will therefore be a direct extension of the existing parking area and will comprise of both paved and gravel parking bays. The gravel parking bays will cater for any overflow, especially when there is an overlap in shifts.

In terms of the National Environmental Management Act, 1998 (Act No.107 of 1998) and the Environmental Impact Assessment Regulations, 2014. The authorisation of the following activities were granted by DEA;

- GN R.983 Activity number 27
- GN R.985 Activity number 12

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| Section | |
| 3 | Location |

The construction is proposed on the following farm:

Section
3.1

Site Camp

The main site camp is situated within the existing car park (33° 40' 26.84"S, 18° 26' 11.39"E), a temporary site camp was located along the entrance road (33° 40' 37.12"S, 18° 27' 12.8"E) during the early phases of the project. The temporary site camp situated along the entrance road was located on ground that is previously disturbed.

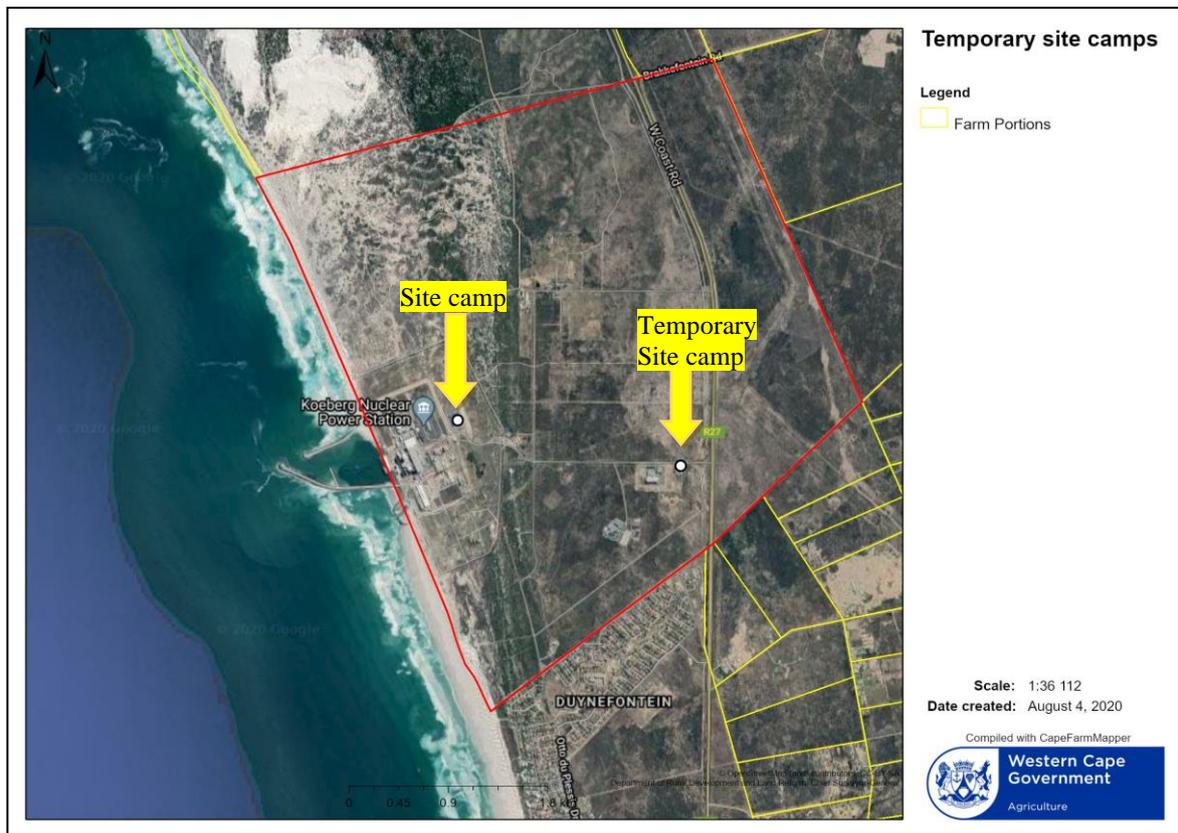


Figure 3: Location of site camp.

Section
4

Construction work

This section highlights and discusses the key construction activities observed during the site inspection.

The construction activities are now within phase 2 of the construction program. At the time of the site visits (13 & 27 January 2021), the ECO noted that the area proposed for clearance had been cleared of vegetation, the first layers of concrete base laid, the curb constructed and the laying of paving had started.

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| Section | Environmental Matters |
| 5 | |

SES will conduct frequent Environmental visits as per the contract. SES is therefore appointed to undertake an monitoring role in terms of this project.

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| Section | Waste Management |
| 5.1 | |

5.1.1 General waste (Site camp)

An integrated waste management approach has been adopted within the site camp and sufficient bins have been made available.

The ECO noted that the plastic wrapping wrapped around the paving when delivered had not been disposed of correctly and was found to be scattered throughout site.

It was also noted by the ECO that waste slips from the disposal of hazardous waste and general waste at a registered hazardous waste facility was not present on site.

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| Section | Vegetation clearance |
| 5.2 | |

The clearance of vegetation has been limited to the working area with sufficient demarcation in place.

| 27 July 2020 | COMPLIANCE WITH THE EMPR, METHOD STATEMENTS AND EA | | | | |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Compliance Full/Part/ Non | | Comments/ Observations | Action to be taken |
| | | 13 January 2021 | 27 January 2021 | | |
| <u>SITE CAMP</u> | | | | | |
| | The site camp and associated areas should be adequately fenced off along the boundaries of these areas, preferably with 2m high fence and shade netting or Bonnox fencing or similar. | Full | Full | | |
| | All construction related materials must be stored within a designated area within the site camp. Where necessary, materials must be adequately protected from the sun, rain and wind. | Full | Full | | |
| | Toilets in an orderly state, serviced regularly. | Full | Full | | |
| | Records (Receipts) of the servicing of these chemical toilets by a specialist toilet hire company must be collected on a weekly basis and maintained on the site file. | Non-compliant | Non-compliant | The ECO noted that there was no such record of the servicing of chemical toilets. | Contractor to ensure that an Environmental file is present on site. Record of the servicing of chemical toilets on site to be recorded in the Environmental file. |
| | Toilets are secured and on a level surface, out of any surface water drainage lines. | Full | Full | | |
| | Adequate signage present designating the site camp as a restricted area and relative dangers. | Full | Full | | |
| | At least 1 fire extinguishers and rubber beaters present. Fire extinguishers should be in working condition and recently serviced. | Full | Full | | |
| | Fuels, chemicals, lubricants and other hazardous substances stored | Full | Full | | |

ECO: EXTENSION OF A CAR PARK AT KOEBERG NUCLEAR POWER STATION ON CAPE FARM 1552, DUYNEFONTEIN CAPE TOWN

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| in a demarcated, secured and clearly sign-posted area. | | | | |
| An adequate supply of sanitary services and potable water must be provided to workers. | Full | Full | | |
| A designated area for food storage, preparation and consumption is to be provided. | Full | Full | | |
| A dedicated area within which construction workers can rest and eat during breaks must be provided is established. | Full | Full | | |
| The site camp and related site camp facilities are kept neat and orderly. | Full | Full | | |
| <u>SITE</u> | | | | |
| Appropriate signage erected to warn other road users about the presence of construction vehicles. | Full | Full | | |
| The total extent of the proposed works and all no-go areas (i.e. Koeberg Nature Reserve) must be clearly demarcated with some form of fencing. | Full | Full | | |
| An appropriate perimeter fence must be erected around the works area. | Full | Full | | |
| The movement of people and the operation of vehicles is not prohibited outside of the demarcated working area or on existing routes. | Full | Full | | |
| All open excavations are to be adequately barricaded. | Full | Full | | |
| Topsoil spoil material is stored separately from the overburden. In the absence of a recognisable topsoil layer, strip the upper most 300 mm of soil where possible. | Full | Full | | |
| Stripped areas and stockpiles are not to be left exposed for prolonged periods of time. | Full | Full | | |
| No stripping of topsoil during or after rains. | Full | Full | | |
| Stripped vegetation is to be stored with topsoil. | Full | Full | | |
| The existing banded batching plant on the KNPS site should be utilised (if ready mix trucks are not available to pour cement directly). | Full | Full | Readymix trucks currently utilised | |
| Stockpiles of earth material not located within any storm-water | Full | Full | | |

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| drainage pathways and is outside of the reach of potential flood waters. | | | | |
| Any erosion runnels/ gullies/ channels that form are infilled with appropriate material, compacted, rehabilitated as needed | Full | Full | | |
| An adequate number of toilets is to be provided (ratio of 1 toilet per 15 users) | Full | Full | | |
| Portable chemical toilets are to be adequately anchored down | Full | Full | | |
| Toilets are not located in or near (within 32m of) any water body, including the effluent outlet canal, and are outside of any storm water drainage lines. | Full | Full | | |
| Materials, fuels and other chemicals and hazardous substances are stored according to the manufacturers' product-storage requirements. | Full | Full | | |
| Material Safety Data Sheets (MSDSs) are available on site for all chemicals and hazardous substances to be used on site. | Full | Full | | |
| No open fires on site. (Or evidence of fires) | Full | Full | | |
| A functioning water truck or cart is to be present on site. | Full | Full | | |
| At least 1 fire extinguishers and rubber beaters present. Fire extinguishers should be in working condition and recently serviced. | Full | Full | | |
| All invasive and exotic plants located within and directly surrounding the car park are to be identified, located and mapped in order to eradicate. | TBC | TBC | | |
| If any archaeological or palaeontological material or human burials are uncovered, work in the immediate area should be halted. The find would need to be reported to the heritage authorities. | Full | Full | | |
| A fire extinguisher should always be present wherever any "hot works" (e.g. welding, grinding etc.) are taking place. | Full | Full | | |
| Hot works that may generate sparks should be properly contained or avoided during strong windy conditions to prevent wind-blown sparks that may cause fires at other locations. | Full | Full | | |
| Smoking should ideally not be allowed on the construction site. Smoking must be prohibited in areas where it may pose a safety risk – e.g. in the vicinity of fuel storage areas. | Full | Full | | |

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| Stockpiles are not to exceed 2m in height or in drainage lines. | Full | Full | | |
| The contact number for the local firefighting service and all relevant emergency numbers must be prominently displayed on site. | Full | Full | | |
| Ensure that Personal Protection Equipment (PPE) is worn by Construction Staff at all times | Full | Full | | |
| <u>FRESHWATER RESOURCES</u> | | | | |
| The ECO is to be notified before any trenching through drainage lines if required. | Full | Full | | |
| <u>TRAFFIC AND VEHICLE CONTROL</u> | | | | |
| Repairs and/or basic maintenance of construction vehicles or equipment undertaken within the designated maintenance yard area, on an impermeable surface, and/or with a tarpaulin and/or drip tray laid down | Full | Full | | |
| Vehicles, machinery and other equipment is in good working order. | Full | Full | | |
| Construction vehicles are to maintain a low speed when driving. The speed limit should be set at 35km/h for vehicles driving past ACP 1 and 50km/h before ACP 1. | Full | Full | | |
| Make use of mobile plant and equipment which is appropriate to the task in order | Full | Full | | |
| The movement of heavy vehicles that have the potential to obstruct traffic should be scheduled to occur outside of peak traffic times as far as possible, so as not to exacerbate traffic congestion. | Full | Full | | |
| <u>TOPSOIL AND SUBSOIL MANAGEMENT</u> | | | | |
| Topsoil from within the car park extension footprint should be stripped to a depth of 300 mm. | Full | Full | | |
| Topsoil is to be handled twice only – once to strip and stockpile, and once to replace and level. | Full | Full | | |
| Topsoil from within the car park extension footprint should be stored within the approved locations indicated on the Construction Plan | Full | Full | | |
| Stockpiles are to be located on the higher side of a disturbed area, and above a 1:50 year flood line. | Full | Full | | |
| The topsoil stored stockpile must be adequately protected from | Full | Full | | |

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| being blown away or eroded by storm water. | | | | |
| Where possible, soil stockpiles should be kept clear of weeds and alien vegetation growth by regular weeding, (or application of herbicides if agreed with the landscaper and/or ECO). | Full | Full | | |
| Topsoil that is stockpiled for prolonged periods of time is to be revegetated or covered appropriately. | Full | Full | | |
| Topsoil to be the final layer applied to the top of the site, and not used as a base or mixed / buried with other materials | Full | Full | | |
| <u>POLLUTION PREVENTION</u> | | | | |
| Drip trays are utilised during decanting of hazardous substances and when refilling chemical/ fuel storage tanks. | Full | Full | | |
| Fuel stored at temporary depots must be located within a bunded area, or alternatively in an area underlain by heavy duty PVC sheeting and covered with 100 mm of sand. | Full | Full | | |
| Fuel stored at long term depots must be located within a designated bunded area, underlain by a concrete slab, sloped towards an oil sump for spillage removal. The bund must be able to accommodate 110% of the full volume of one of the containers. | Full | Full | | |
| An impervious surfacing must be placed adjacent to fuel tanks, upon which vehicles must park during refuelling. | Full | Full | | |
| Drip trays placed under generators (if used on site) water pumps and any other machinery on site that utilises fuel/ lubricant. | Full | Full | | |
| A spill kit to neutralise/treat spills of fuel/ oil/ lubricants is available on site. Appropriate training completed. | Full | Full | | |
| A tarpaulin and/or drip trays must be laid down prior to emergency repairs taking place, to prevent any fuel/ oil/ lubricant spillages from contaminating the environment. | Full | Full | | |
| Chemical spills are to be contained and isolated in accordance with section 5.3.2 of the EMPr. Clean-up/control is to be organised by the supplier. | Full | Full | | |
| An oil spill kit (i.e. DRIZIT wheely bin) must be allocated to the site in the advent of a hydrocarbon spill onto exposed soil. | Full | Full | | |
| No depot or containers with any hazardous substance is to be | Full | Full | | |

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| located within the vegetation line of the Koeberg Nature Reserve. | | | | |
| Dumping of waste or foreign material is strictly prohibited within the Koeberg Nature Reserve. | Full | Full | | |
| Sufficient stormwater control is required to prevent the discharge of water into the Koeberg Nature Reserve area. | Full | Full | | |
| Accidental fuel spills or leakages are to be immediately cleaned up using the method outlined within section 5.3.4 of the EMPr | Full | Full | | |
| Wash water from wash bays and water/slurry from cement and concrete mixing operations is to be contained | Full | Full | | |
| Waste water is to be directed towards a settlement pond or similar for later disposal. | Full | Full | | |
| Washing of vehicles and machinery is to take place within designated wash bays. | Full | Full | | |
| Drip trays and soiled tarpaulin must be emptied and/or disposed of in the hazardous waste bin on site. | Full | Full | | |
| WASTE MANAGEMENT | | | | |
| Dedicated waste bins or skips kept in a demarcated area on an impermeable surface. | Full | Full | | |
| Waste placed in the appropriate waste bins/skips. | Full | Full | | |
| Separate bins/skips provided for rubble, green waste, recyclables, general waste and hazardous waste. | Full | Full | | |
| Hazardous waste bins kept on an impermeable bunded surface capable of holding at least 110% of the volume of the bins. | Full | Full | | |
| Skips/ bins provided with secure lids or covering that will prevent scavenging and windblown waste. | Full | Full | | |
| Rubble and waste rock must be disposed of at the nearest registered municipal solid waste disposal facility. All waste collections slips (Waybills) kept on file. | Non-compliant | Non-compliant | The ECO noted that the contractor was unable to produce waste slips for the disposal of rubble and waste rock. | Contractor to provide ECO with waste slips for the disposal of rubble and waste rock. Contractor to ensure that an Environmental file is present on site. |

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| Hazardous waste disposed of at a licensed hazardous facility (i.e. Visserhok site). | Non-compliant | Non-compliant | The ECO noted that the contractor was unable to produce waste slips for the disposal of generated hazardous waste. | Contractor to provide ECO with waste slips for the disposal of hazardous waste. Contractor to ensure that an Environmental file is present on site. |
| A record of all hazardous waste stored on site is present on site. | Non-compliant | Non-compliant | The ECO noted that there was no such record of all hazardous waste stored on site. | Contractor to ensure that an Environmental file is present on site. Record of all hazardous waste stored on site to be recorded in the Environmental file. |
| Soil contaminated by hazardous substances is excavated and disposed of as hazardous waste. | Full | Full | | |
| Waste may not be burned or buried on site. | N/A | N/A | <i>Contractor to confirm.</i> | |
| Records of all waste generated, received, recovered and recycled are to be kept on site. | Non-compliant | Non-compliant | The ECO noted that there was no such record of of all waste generated, received, recovered and recycled on site. | Contractor to ensure that an Environmental file is present on site. Record of all waste generated, received, recovered and recycled to be recorded in the Environmental file. |
| <u>CEMENT AND CONCRETE BATCHING</u> | | | | |
| Cement and concrete mixing is to be limited to single sites. | Full | Full | | |
| Cement and concrete may not be mixed on open ground. | Full | Full | | |
| All visible remains of excess cement and concrete must be disposed of in the approved manner. | Full | Full | | |
| Unused cement bags must be stored in such a way that they will be protected from rain. | Full | Full | | |

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| Empty cement bags must be disposed of in the hazardous waste bins on site. | Full | Non-compliant | On January 27 th 2021, the ECO noted that cement bags were found lying around on site and had not been appropriately disposed of. | The contractor is to ensure that empty cement bags are disposed of within the hazardous waste bin on site, as well as ensure that construction workers are aware of this measure. |
| <u>NOISE CONTROL</u> | | | | |
| Noise-levels comply with the relevant health and safety regulations and SANS codes and is monitored by the Health & Safety Officer, as appropriate. | Full | Full | | |
| Eskom personnel working at the KNPS must be informed by the Contractor of construction working hours and of any other activity that may cause a nuisance. | Full | Full | | |
| Vehicles, machinery and other equipment must be kept in good working order. | Full | Full | | |
| No loud music is permitted on site. | Full | Full | | |
| <u>DUST CONTROL</u> | | | | |
| Construction and clearing activities do not take place during heavy rains, or windy conditions. | Full | Full | | |
| Stockpiles of topsoil & spoil material are protected from wind & water erosion. | Full | Full | | |
| Cleared areas are provided with a suitable cover as soon as possible, and not left exposed for extended periods of time. | Full | Full | | |
| Material loads are properly covered during transportation. | Full | Full | | |
| Dust must be suppressed on access roads and construction sites during dry periods by the regular application of water or a biodegradable soil stabilisation agent. Water is not to be sourced from Koeberg Nature Reserve | Full | Full | | |
| <u>EROSION CONTROL AND STORMWATER MANAGEMENT.</u> | | | | |

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| Land clearing, earthworks and construction activities must be restricted to within the footprint of the demarcated working area, to prevent unnecessary disturbance, compaction or exposure of surrounding earth surfaces. | Full | Full | | |
| Where possible, land clearing and earthworks should be avoided during strong winds or heavy rains, as this may exacerbate erosion and soil loss. | Full | Full | | |
| Stripped areas do not remain uncovered for extended periods of time. | Full | Full | | |
| <u>CLEARING OF VEGETATION</u> | | | | |
| Only the area required to accommodate construction activities within the working area is cleared of surface covering. | Full | Full | | |
| All land-clearing activities must be restricted to within the demarcated working area. NO clearing of vegetation may occur outside of the demarcated footprint and NO vegetation may be cleared from within the no-go areas. | Full | Full | | |

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| Section |
| 6.1 |

Fining system

6.1 Fines

As per the approved EMPr, fines may be issued by the appointed ECO for the transgressions listed below. The ESKOM Project/Site Manager will inform the responsible Contractor of the contravention and the amount of the fine, and will deduct the amount from monies due under the Contract.

| | | |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| A | Any person, vehicles, plant, or thing related to the Contractors operations within the designated boundaries of a "no-go" area (i.e. within a natural area in the Koeberg Nature Reserve). | R 4000 |
| B | Any vehicle driving in excess of designated speed limit on the KNPS property (50km/h, and 35km/h past Access Control Point 1) | R 1000 |
| C | Any vehicle being driven, and items of plant or material being parked or stored outside the demarcated boundaries of the site | R 2000 |
| D | Any person walking outside the demarcated boundaries of the site | R 500 |
| E | Persistent and un-repaired oil leaks from machinery. The use of inappropriate methods of refueling such as the use of funnel rather than a pump. | R 3000 |
| F | Litter of site | R 1000 |
| G | Deliberate lighting of illegal open fires on site | R 5000 |
| H | The eating of meals on site outside the defined eating areas. Individuals not making use of the site ablution facilities. | R 1000 |
| I | Dust or excess noise on or emanating from the site. | R 1000 |
| J | Any person, vehicle, item of plant, or anything related to the Contractors operation causing a public nuisance. | R 2000 |

The following penalties are suggested for transgressions:

| | | |
|----------|----------------------------------|--------------------------------------------------------------------------------------------------|
| A | Erosion | A penalty equivalent in value to the cost of rehabilitation plus 20% |
| B | Oil spills | A penalty equivalent in value to the cost of |
| C | Damage to indigenous vegetation | A penalty equivalent in value to the cost of restoration plus 20% |
| D | Damage to sensitive environments | A penalty equivalent in value to the cost of restoration plus 20% |
| E | Damage to cultural sites | A penalty to a maximum of R100 000 shall be paid for any damage to any cultural/historical sites |

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| Section | Conclusion |
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SES has compiled this Environmental Monitoring Report to detail compliance with the EA and EMPr for the site inspections conducted on the 13th and 27th January 2021. The activities undertaken within the site camp and site were deemed to be compliant with the conditions noted within the approved EMPr and EA.

Section
8

Photo record

Site visit-13 January 2021



Image 1: Site



Image 2: Temporary access point.



Image 3: Site camp.



Image 4: Storage within the site camp.



Image 5: Site camp offices.

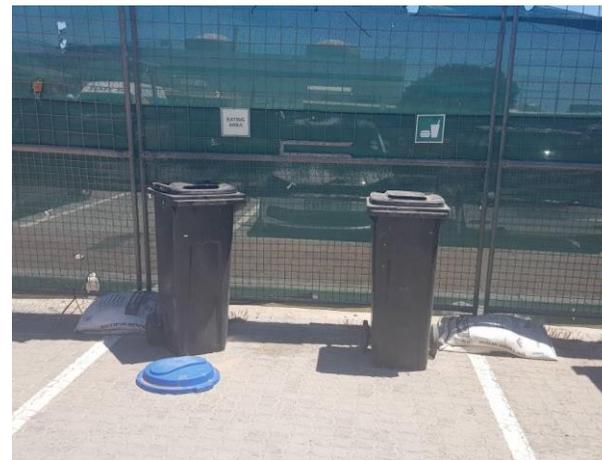


Image 6: Waste receptacles within the site camp.



Image 7: Fire extinguisher within the site camp.



Image 8: Storage of waste within the site camp.



Image 9: Storage of hazardous materials within the site camp.



Image 10: Spill kit within the site camp.



Image 11: Demarcation of excavations.



Image 12: Ablutions within the site camp.

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Image 13: Laying of pavement curbs on site.



Image 14: Construction vehicles on site.



Image 15: Perimeter fence and clearance of vegetation limited to site.



Image 16: Drip tray placed under stationary construction vehicle.



Image 17: Stockpiled material on site.



Image 18: Fire extinguisher on site.



Image 19: Notice informing public of the presence of a construction site.

Site visit-27 January 2021



Image 20: Spill kit situated within the site camp.



Image 21: Site camp in an orderly state.

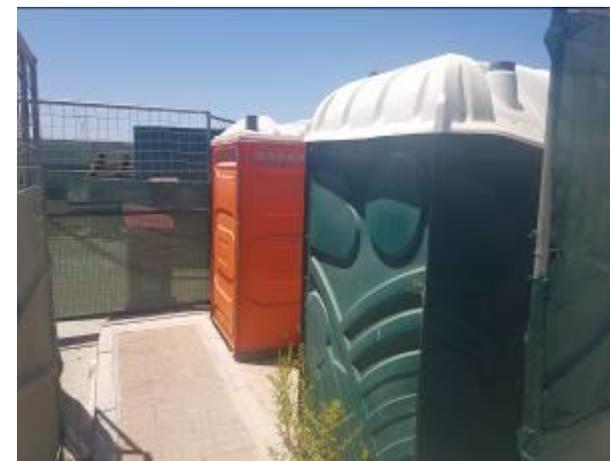


Image 22: Ablutions within site camp.

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Image 23: Labeled waste receptical.



Image 24: Storage of materials within the site camp.



Image 25: Construction vehicle on site.



Image 26: Construction vehicles and stormwater infratsructure on site.



Image 27: Demarcation on site.



Image 28: Temporary access point



Image 29: Topsoil stockpile for rehabilitation.



Image 30: Cement bags not disposed of correctly.



Image 31: Curb infrastructure on site.



Image 32: Compacted area, awaiting paving.



Image 33: Paving wrapping not disposed of correctly.



Image 34: Fence line around site.



Image 35: Paving on site.



Image 36: Paved area on site.



Image 37: Paved area on site.