# ATAL-BELGOPROCESS JOINT VENTURE

# Contract No. EP/SP/40/02

# Low Level Radioactive Waste Storage Facility at Siu A Chau

Environmental Monitoring and Audit Manual (Version 1.3) (Part 1: Non-Radiological)

November 2003

Certified By

(Environmental Team Leader)

#### REMARKS:

The information supplied and contained within this report is, to the best of our knowledge, correct at the time of printing.

CINOTECH accepts no responsibility for changes made to this report by third parties.

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2 January 2004

ATAL Belgoprocess Joint Venture Limited, 17/F., Java Commercial Centre, 128 Java Road, North Point, Hong Kong. (Attn: Mr. Barry Lee)

Dear Sir,

Environmental Impact Assessment (EIA) Ordinance, Cap. 499
Further Environmental Permit No. FEP-01/131/2003
Project Title: Low-Level Radioactive Waste Storage Facility
Permit Condition 2.5 – Environmental Monitoring and Audit (EM&A) Manual

I refer to your letter ref. ABJV/SP/768/0311044/RY dated 28 November 2003 submitting an EM&A Manual, certified by the Environmental Team Leader, for the captioned project under Condition 2.5 of the Further Environmental Permit FEP-01/131/2003 (the EP) and the Independent Environmental Checker's letter ref. 23898/ST/FL/AC/ac-20173 dated 20 November 2003 verifying the EM&A Manual. It is noted that the EM&A Manual covers the EM&A requirements during construction stage while the EM&A requirements for radiological monitoring during operation stage would be submitted separately for approval prior to incorporation into the EM&A Manual.

Please be advised that the captioned EM&A Manual is approved for the purpose of Condition 2.5 of the above EP subject to further submission of radiological monitoring for approval before commencement of operation. The EM&A Manual will be placed in the EIAO Register Office for access by the public.

Please be reminded that the Permit Holder is required to implement the EM&A programme in accordance with the procedures and requirements in the EM&A Manual, fully and properly implement measures recommended in the EM&A Manual, and carry out actions described in the Event and Action Plans of the EM&A Manual. The ET Leader and the IEC shall be responsible for the duties stated in the EP and the EM&A Manual. Site environmental audit shall be regularly carried out and additional monitoring shall be conducted whenever necessary.

Please note that the approval of the EM&A Manual will not relieve any responsibility of you or your agents in complying with other requirements of the EP or other legal requirements.

Should you have any question on the above, please contact our Mr. Colin KEUNG at Tel: 2835 1562.

Yours faithfully,

(KHTO)

Acting Principal Environmental Protection Officer For Director of Environmental Protection

c.c. P(SW)/EPD

(Attn.: Mr. Lui Ping Hon)

# ATAL Belgoprocess Joint Venture Limited





ATAL Engineering Limited

Our Ref.: ABJV/SP/768/0401026/ML

15 January 2004

The EIA Ordinance Register Office

**Environmental Protection Department** 27<sup>th</sup> Floor, Southorn Centre 130 Hennessy Road Wan Chai, Hong Kong

Via Fax then By Mail  $(2591\ 0558) -$ 

Attn.: Mr. Mathew Chan

Dear Sir.

# Contract No. EP/SP/40/02 Low-Level Radioactive Waste Storage Facility at Siu A Chau EM&A Manual (Non-Radiological)

As per your request on 14 January 2004, we would submit herewith three additional copies and one electronic copy of the EM&A Manual (Non-Radiological) (Version 1.3) verified by our IEC.

> Yours faithfully. For and on behalf of ATAL-Belgoprocess Joint Venture Limited

> > Barry Lee Project Manager

BL/RY/ML

Encl. (3 copies + 1 CD, as-stated)

RECE" (ED

1 9 JAN 2004

EIAO Register Office

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#### 1 INTRODUCTION

#### Background

- 1.1 Various industrial, educational and medical facilities in Hong Kong have, for a number of years, used radioactive materials and generated radioactive waste. Most of the existing waste arisings are stored in disused air raid tunnels close to Queen's Road East in Wan Chai. Other arisings are stored temporarily (although in some cases for several years) at the point of use in educational institutions or hospitals.
- 1.2 The condition of the Queen's Road East tunnels has been found to be unsatisfactory and various parts of the tunnel system suffer from leakage and ingress of water. The condition of some of the waste packages has subsequently deteriorated and they are generally unsatisfactory for the safe long-term containment and storage of radioactive materials.
- 1.3 The existing facilities are unsatisfactory and in addition are located close to a high density of population, which make access to, and management of, the waste more problematic. As well as existing waste, there is also a continuing need to use radioactive materials in Hong Kong and a continuing predictable amount of future waste arisings. Therefore, the Government has decided that storage of low-level radioactive waste in Hong Kong requires a dedicated, purpose-designed facility. After a thorough consultancy study in the "Environmental Impact and Safety Assessment Report, June 1995 (Stage 1 EISA)" and evaluation, the preferred site located on the island of Siu A Chau in the Soko Islands, adjacent to the small bay of Sum Wan on the eastern side of the island was selected.
- 1.4 Environmental Protection Department (EPD) commissioned the construction and operation of the Low-Level Radioactive Waste Storage Facility (LRWF) at Siu A Chau (hereinafter referred as the "Project") under Contract No. EP/SP/40/02 to ATAL-Belgoprocess Consortium (hereinafter called "the Contractor") in July 2003.
- An Environmental Permit (EP) (No. EP-131/2002) for the Project was issued on 11 April 2002 to the Special Waste Facilities Group, Environmental Protection Department as Permit Holder. Under the Tender Specification Clause 1.6.3.1, the Contractor is required to obtain a Further Environmental Permit (FEP) before he assumes the responsibility for relevant construction and operation.
- 1.6 As stipulated in the EP Condition 2.5, an Environmental Monitoring and Audit (EM&A) Manual shall be submitted for EPD's approval one month before the commencement of construction of the Project. The EM&A Manual shall include the latest information of the EM&A programme for the ecological and water quality (non-radiological) monitoring during the construction and operation of the LRWF. In addition, the EM&A Manual shall also include a proposal for radiological monitoring as outlined in the Stage 1 EISA.
- 1.7 Cinotech Consultants Limited was commissioned by the Contractor to undertake the EM&A works for the Project. This EM&A Manual was prepared by Cinotech to fulfill the permit requirement for the EM&A programme for non-radiological monitoring (Part

1 of the EM&A Manual). The radiological monitoring programme will be submitted under a separate cover (Part 2 of the EM&A Manual).

### Purpose of this Manual

- 1.8 The purpose of this Part 1 of the EM&A Manual (Non-radiological) is to guide the setup of an EM&A programme to ensure compliance with the non-radiological monitoring requirements of the Stage 1 EISA, June 1995, include the latest information for the ecological and water quality monitoring, and to assess the effectiveness of the recommended mitigation measures. The EM&A requirements for radiological monitoring will be submitted separately as a stand-alone manual (Part 2 of the EM&A Manual).
- 1.9 This Manual outlines the monitoring and audit programme to be undertaken for the construction of low-level radioactive waste storage facility at Siu A Chau. It aims to provide systematic procedures for monitoring, auditing and minimising the environmental impacts associated with the construction works and operation.
- 1.10 Hong Kong environmental regulations for noise, air quality, water quality and waste, the Hong Kong Planning Standards and Guidelines, and the recommendations in the Stage 1 EIA have served as environmental standards and guidelines in the preparation of this Manual.
- 1.11 This Manual contains the followings:
  - (a) duties of the Contractor, the Employer's Representative (ER), the Independent Environmental Checker (IEC) and the Environmental Team (ET) with respect to the environmental monitoring and audit requirements during construction and operation;
  - (b) information on project organisation and programming of construction activities for the project;
  - (c) requirements with respect to the construction schedule and the necessary environmental monitoring and audit programme to track the varying environmental impacts;
  - (d) definition of Action and Limit (A/L) Levels;
  - (e) establishment of event and action plans;
  - (f) requirements of reviewing pollution sources and working procedures required in the event of non-compliance of the environmental criteria; and
  - (g) requirements of presentation of environmental monitoring and audit data and appropriate reporting procedures.
- 1.12 For the purpose of this Manual, the "Engineer" will refer to the Employer's Representative (ER) as defined in the "Low-Level Radioactive Waste Storage Facility at Siu A Chau, Specification Vol.3". The ET Leader, who will be responsible for and in charge of the ET of the construction and operational phases of the Project, will refer to the person delegated the role of executing the environmental monitoring and audit requirements. IEC will undertake the auditing role.

#### **Description of the Works**

- 1.13 The Project comprises the Design, Construction, Operation and skills transfer of a low-level radioactive waste storage facility at Siu A Chau. The general layout of the proposed low-level radioactive waste storage facility at Siu A Chau under current scheme is shown in **Figure 1.1**. The construction works include the following key components:
  - Construction of a building of approximately 1000 m<sup>2</sup> with an elevation of about 6.5m required to store circa 260, 275-litre drums if unstacked and moved by overhead travelling crane (o.t.c) or forklift.
  - Construction of a helicopter landing pad and marine access jetty.
  - Landscaping and security requirements.
- 1.14 The total site area is approximately 0.61 ha. The envisaged storage requirements led to an initial design concept of a simple building with a reinforced concrete or structural steel frame. The composition and finish of the external walls and roof would be determined by the requirements for weatherproofing and other considerations such as visual impact. The building would be raised on a 200mm dais to prevent water ingress and all internal areas would drain to a sump. The building would contain a main storage area with aisles for maneuvering a stacking vehicle, a processing/repackaging/assaying area, and an administration area with washroom facilities.

# **Environmental Monitoring and Audit Requirements**

1.15 The Stage 1 EISA identified the likely environmental impacts during construction and operational phases of the development, including ecology and fisheries, water quality, air quality, noise, transport, historical and cultural heritage, potential visual impact and solid waste. These impacts can be minimized to acceptable levels with the implementation of environmental mitigation measures. In order to ensure compliance with relevant environmental standards, baseline and compliance monitoring for water quality and ecology is required and is described in detail in the subsequent sections. The proposed schedule for the implementation of recommended mitigation measures is shown in **Appendix A**.

#### **Project Organizations**

- 1.16 The proposed EM&A organization is shown in **Figure 1.2** of this Manual. The responsibilities of respective parties for the EM&A programme are listed in later Clauses.
- 1.17 The Environmental Team (ET) will be employed by the Contractor and undertake the EM&A works. The Independent Environmental Checker (IEC) will be engaged by the Contractor to audit the work of the ET. The IEC will not be in any way an associated body of the Contractor or the ET. The ET and the IEC Team Leader will have relevant professional qualifications, or have sufficient relevant EM&A experience subject to approval of the Environmental Protection Department (EPD).

1.18 Appropriate staff will be included in the ET and IEC under the supervision of the

ET/IEC Team Leader, to fulfill the EM&A duties specified in this Manual.

1.19 The duties and responsibilities comprise the following:

#### The Contractor

- Employ an Environmental Team (ET) to undertake EM&A works, including laboratory analysis and reporting of environmental monitoring and audit;
- Provide assistance to the ET in carrying out environmental monitoring and audit;
- Submit proposals on mitigation measures in case of exceedances of A/L levels in accordance with the Event and Action Plans;
- Implement measures to reduce impact where A/L levels are exceeded; and
- Adhere to the procedures for carrying out complaint investigation in accordance with Sections 7.11 to 7.14 of this Manual.

# Employer's Representative (ER)

- Supervising the Contractor activities and ensure that the requirements in the EM&A Manual are fully complied with;
- Inform the Contractor when action is required to reduce environmental impacts in accordance with the Event and Action Plans; and
- Adhere to the procedures for carrying out complaint investigation in accordance with Sections 7.11 to 7.14 of this Manual.

### **Environmental Team (ET)**

- Monitor the various environmental parameters as required in this Manual;
- Analyze the environmental monitoring and audit data;
- Review the EM&A programme to confirm the adequacy of mitigation measures implemented and the validity of the EIA predictions and to identify and adverse environmental impacts arising;
- Carry out site inspection to investigate and audit the Contractor's site practice, equipment and work methodologies with respect to pollution control and environmental mitigation, and effect proactive action to pre-empt problems;
- Audit and prepare EM&A reports on the environmental monitoring data and site environmental conditions;
- Report the environmental monitoring and audit results to the IEC, the Contractor, the ER and EPD;
- Recommend suitable mitigation measures to the Contractor in the case of exceedance of A/L levels in accordance with the Event and Action Plans; and
- Adhere to the procedures for carrying out complaint investigation in accordance with Sections 7.11 to 7.14 of this Manual.

#### **Independent Environmental Checker (IEC)**

- Employed by the Contractor to audit the results of the EM&A works carried out by the ET;
- review the EM&A works performed by the ET;
- audit the monitoring activities and results;
- report the audit results to the ER and EPD in parallel;
- reviewing EM&A reports submitted by the ET;
- review proposals on mitigation measures submitted by the Contractor in accordance with the Event and Action Plans and advise the ER; and
- adhere to the procedures for carrying out complaint investigation in accordance with Sections 7.11 to 7.14 of this Manual.

# **Construction Programme**

- 1.20 The tentative works programme for the project is presented in **Appendix B**.
- 1.21 The project programme is indicative only and is provided for information of the ET Leader to get an initial idea of the sequence of the works. The ET Leader will make reference to the actual works programme and progress during the construction stages to schedule the EM&A works, and the Contractor will provide the respective information to the ET Leader for formulating the EM&A schedule.

#### 2 NOISE

2.1 The island of Siu A Chau is not inhabited. The closest potential receiver is the refugee camp located on Tai A Chau, at Ha Tsuen, which is 1.7km away. There will be no direct line of sight from the facility and the camp. Ha Tsuen is sheltered behind Fei Kei Teng which has a maximum height of 85m, and a minimum height of 20m. The only potential receiver is Shek Pik Prison on Lantau Island. This is 5.5 km from the proposed site. Noise level reaching the noise sensitive receivers should be minimal and within an unnoticeable levels. Therefore, as mentioned in the Stage 1 EISA, due to distance and natural shielding, no sensitive receivers could be affected during construction and operation, monitoring of noise is considered not necessary.

#### **Noise Mitigation Measures**

- 2.2 As above mentioned, noise should not be significant to sensitive receivers. However, noise mitigation measures as stipulated in the Stage 1 EISA and the Tender Specification should be undertaken to promote noise consciousness at site. The mitigation measures are summarized in Appendix A.
- 2.3 The Contractor shall ensure that all plant and equipment to be used on Site are properly maintained in good operating condition and noisy construction activities shall be effectively sound-reduced by means of silencers, mufflers, acoustic linings or shields, acoustic sheds or screens or other means to avoid disturbance to nearby noise sensitive receivers if any.
- The Contractor shall, when necessary, apply as soon as possible for a construction noise permit in accordance with the Noise Control (General) Regulations, display the permit as required and copy to the ER.

### 3 AIR QUALITY

- 3.1 There are no known sensitive receivers for whom construction or operation of the LRWF may pose a problem. Therefore, as mentioned in the Stage 1 EISA, monitoring of air quality is considered not necessary.
- 3.2 Nevertheless, given the pristine nature of the area, certain precautions have been recommended to minimise the discharges of materials, vapors and gases during construction and from the operational use of the facility.
- 3.3 The Contractor shall undertake at all times to prevent dust nuisance as a result of his activities. Effective dust suppression measures as are necessary should be installed to ensure that the air quality, at the boundary of the site and at any sensitive receivers, complies with the Hong Kong Air Quality Objectives.

# Air Quality Mitigation Measures

#### **Construction Phase**

- 3.4 Dust suppression measures as stipulated in the Stage 1 EISA and the Tender Specification should be undertaken to minimize dust emission and reduce the impacts of dust on the nearby ASRs. Appendix A summarizes the mitigation measures to be adopted. Strictly limit the truck speed on site to below 15 km per hour and water spraying to keep the haul roads in wet condition. This will reduce the dust generation by about 90%, in accordance with Control Techniques for Particulate Emissions from Stationary Sources, Volume 2, US Environmental Protection Agency 1982;
- 3.5 Twice daily watering of the work site with active operations when the weather and the work site are dry. Through the implementation of this mitigation measure, dust emissions from materials handling can be reduced by 50%, according to USEPA AP-42;
- 3.6 Water spraying during excavation and material handling;
- 3.7 Provision of vehicle wheel and body washing facilities at the exit points of the site; and
- 3.8 Tarpaulin covering of all dusty vehicle loads transported to, from and between site locations.

#### **Operational Phase**

- 3.9 Operational measures taken to protect workers in the LRWF, such as the negative pressure ventilation system (from less active to potentially most active areas), together with the use of control mechanisms including high efficiency particulate (HEPA) filters, will reduce the potential environmental impacts to negligible levels.
- 3.10 The LRWF will require general ventilation, with a filtration system to trap dust from incoming air, and remove air borne particles using a High Efficiency Particulate Air Filter from out-going air. The following design and operation features shall be required to be incorporated by the Contractor:

- all gases and emissions must pass through a High Efficiency Particulate Air Filter with an efficiency of at least 99.99%;
- the Facility must be kept under a negative pressure ventilation system (the direction of air currents being from areas least potentially radioactive or contaminated, to areas most potentially radioactive or contaminated);
- any air pollution control systems installed shall be operated continuously;
- the Contractor shall not install any furnace, boiler or other plant or equipment or use any fuel that might in any circumstance produce smoke or any other air pollution without the prior approval of the Independent Consultants and consent of the Employer;
- the Contractor's attention is drawn to the Air Pollution Control Ordinance and its subsidiary legislation, particularly the Air Pollution Control (Furnaces, Ovens and Chimneys) (Installation and Alteration) Regulations and the Air Pollution Control (Smoke) Regulations.

## 4 WATER QUALITY

# Water Quality Parameters

- 4.1 Monitoring of temperature, dissolved oxygen (DO, in both mg/l and % saturation), turbidity and suspended solids (SS) at monitoring stations W1 –W3, will be carried out by the ET to ensure that any deteriorating water quality is readily detected and timely action can be taken to rectify the situation. At the monitoring station WS, monitoring of conductivity, temperature, optical turbidity and dissolved oxygen is required to be conducted.
- 4.2 In association with the water quality parameters, other relevant data will also be measured, such as monitoring location/position, time, water depth, salinity, weather conditions, sea conditions, tidal stage, any special phenomena and work underway at the construction site and any other relevant information.

# **Monitoring Equipment**

4.3 For water quality monitoring, the following equipments will be supplied by the ET, verified by IEC and approved by the ER. Table 4.1 summarizes the details of the monitoring equipment to be deployed, the model number, manufacturer and the calibration date.

### Position System

4.4 A hand held or boat fixed type digital Global Positioning System (GPS) will be used to ensure that the correction location has been selected prior to sample collection.

#### Water Depth Detector

4.5 A portable, battery-operated echo sounder (Seafarer 700 or a similar approved instrument) will be used for the determination of water depth at each designated monitoring station. This unit can either be hand held or affixed to the underside of the survey boat, if the same vessel is to be used throughout the monitoring programme.

# Dissolved Oxygen (DO) and Temperature Measuring Equipment

- 4.6 The instrument for measuring dissolved oxygen and temperature will be portable and weatherproof complete with cable, sensor, comprehensive operation manuals and use DC power source. It will be capable of measuring:
  - a dissolved oxygen level in the range of 0-20 mg/L and 0-200% saturation; and
  - a temperature of 0-45 degree Celsius.
- 4.7 It will have a membrane electrode with automatic compensation complete with a cable.
- 4.8 Sufficient stocks of spare electrodes and cables will be available for replacement where necessary (e.g. YSI model 59 meter, YSI 5739 probe, YSI 5795A submersible stirrer

with reel and cable or an approved similar instrument).

4.9 In situ salinity will be measured to calibrate the DO equipment prior to each DO measurement if salinity compensation is not built-in in the DO equipment.

# **Turbidity**

4.10 Turbidity will be measured *in situ* by the nephelometric method. The instrument will be portable and weatherproof using a DC power source complete with cable, sensor and comprehensive operation manuals. The equipment will be capable of measuring turbidity between 0-1000 NTU. The probe cable will not be less than 25m in length. The meter will be calibrated in order to establish the relationship between NTU units and the levels of SS.

# Water Sampling for Laboratory Analysis

4.11 A water sampler as detailed in Section 4.12 will be used to collect samples for laboratory analysis.

### Suspended Solids (SS)

- 4.12 A water sampler, consisting of a transparent PVC or glass cylinder of a capacity of not less that two litres which can be effectively sealed with cups at both ends will be used (Kahlsico Water Sampler 135DW 150 or an approved similar instrument). The water sampler will have a positive latching system to keep it open and prevent premature closure until released by a messenger when the sampler is the selected water depth.
- 4.13 Water samples for SS will be collected in high density polythene bottles, packed in ice and delivered to HOKLAS accredited laboratory for analysis as soon as possible after collection.

#### Sample Container and Storage

4.14 Following collection, water samples for SS will be stored in high density polythene bottles with no preservative added, packed in ice (without being frozen), delivered to the laboratory and analysed as soon as possible.

#### Calibration of In Situ Instruments

- 4.15 All *in situ* monitoring instruments will be checked, calibrated and certified by a laboratory accredited under HOKLAS or other international accreditation scheme before use, and subsequently re-calibrated at 2 monthly intervals throughout all stages of the water quality monitoring.
- 4.16 For the on site calibration of field equipment, the Equipment or Operation Manual provided by the manufacturer will be followed. The BS 1427:1993, "Guide to Field and on-site test methods for the analysis of waters" will also be referenced.
- 4.17 Sufficient stocks of spare parts will be maintained for replacements when necessary. Backup monitoring equipment will also be made available so that monitoring can

proceed uninterrupted even when some equipment is under maintenance, calibration, etc.

Table 4.1 Details of the Monitoring Equipment to be Deployed, the Model Number, Manufacturer and Calibration Date

Parameters/ Functions	The Equipment to be Deployed	Model and Make	Calibration Dated	
Positioning	Digital Global Positioning System (GPS)	"Standard Horizon" Handheld GPS Magnum NAV-40	N/A	
Water Depth	Echo sounder	"Humminbird" In- Dash Digital Depthsounder HDR 600	N/A	
Water Sampling	Kahlsico Water Sampler	135 WB150	N/A	
Routine Water	r Quality Monitoring			
Dissolved Oxygen and Temperature	YSI Model 6820 CE-C-M-Y	YSI 6820	3 September 2003	
Turbidity	YSI Model 6820 CE-C-M-Y	YSI 6820	3 September 2003	
12-hours Continuous Water Quality Monitoring				
Dissolved Oxygen and Temperature	YSI Model 6920 M	YSI 6920	9 September 2003	
Turbidity	YSI Model 6920 M	YSI 6920	9 September 2003	

# Laboratory Analytical Methods

4.18 Analysis of SS will be carried out in a HOKLAS or other international accredited laboratory. The following table shows the standard test methods of the proposed determinants for laboratory analysis.

Table 4.2 Methods for Laboratory Analysis for Water Samples

Parameters (Unit)	Suggested Method	
SS (mg/L)	APHA 2540 D	
Notes:		

APHA = American Public Health Association: Standard Methods for the Examination of Water and Wastewater Ed. 19.

- 4.19 The testing laboratory will be HOKLAS accredited and comprehensive quality assurance and control procedures in place in order to ensure quality and consistency in results.
- 4.20 For the testing methods of other parameters as recommended by EPD, detailed testing methods, pre-treatment procedures, instrument use, quality assurance/quality control (QA/QC) details (such as blank, spike recovery, number of duplicate samples per batch,

11

etc.), detection limits and accuracy will be submitted to EPD for approval prior to the commencement of monitoring programme. The QA/QC will be in accordance with the requirement of HOKLAS or international accredited scheme. The QA/QC results will be reported. EPD may also request the laboratory to carry out analysis of know standards provided by EPD for quality assurance. Additional duplicate samples may be required by EPD for inter laboratory calibration. Remaining samples after analysis will be kept by the laboratory for 3 months in case repeat analysis is required. If in-house or nonstandard methods are proposed, details of the method verification may also be required for submission to EPD. In any circumstance, the sample testing will have comprehensive quality assurance and quality control programmes. The laboratory will prepare to demonstrate the programmes to EPD.

4.21 **Table 4.3** summarises the equipment used for the 12-hour continuous water quality monitoring.

Table 4.3 12-Hour Continuous Water Quality Monitoring Equipment

Equipment Name	Model
Multi-Sensor Probe	YSI 6920
Dissolved Oxygen Sensor	YSI 6562
Temperature & Conductivity Sensor	YSI 6560
Turbidity Sensor	YSI 6026

# **Monitoring Locations**

4.22 The water quality monitoring locations are shown in **Figure 4.1** and their coordinates are provided in **Table 4.4**.

**Table 4.4 Water Quality Monitoring Locations** 

Station	Co-ord	linates
	Northing	Easting
W1	804471.4	809611.2
W2	804330.9	809558.6
W3	804393.9	809725.0
WS	804555.2	809535.9

4.23 Prior to the commencement of the EM&A programme, the proposed water quality monitoring stations will be proposed by the ET Leader, verified by IEC and approved EPD.

#### **Monitoring Programme**

4.24 A water quality monitoring schedule, as shown in **Table 4.5**, is established to ensure that any deterioration in water quality can be readily detected and timely action can be taken to rectify the situation.

Table 4.5 Water Quality Monitoring Schedule

Monitoring Stations	Parameters, unit	Depth	Frequency <sup>1</sup>
W1, W2, W3	<ul> <li>DO Saturation, %</li> <li>DO, mg/L</li> <li>Temperature, °C</li> <li>Turbidity, NTU</li> <li>SS, mg/L</li> </ul>	Three depths (1m below surface, mid-depth and 1m above seabed) at mid-flood and midebb tides	Baseline:  • 4 times per week for 2 weeks prior to commencement of pertinent construction activity
12-Hour Monitoring Station: WS	<ul> <li>Conductivity</li> <li>Water depth, m</li> <li>DO Saturation, %</li> <li>DO, mg/L</li> <li>Temperature, °C</li> <li>Turbidity, NTU</li> </ul>	Mid-depth, with data logging at every 5 minutes for 12 hours between 0700 and 1900	Impact:  • 3 times per week during construction of unloading facility

<sup>1. 2</sup> consecutive readings of in-situ parameters will be taken in order to agree accuracy within 25%

# **Baseline Monitoring**

- 4.25 Baseline monitoring program for marine water quality will be established by ET Leader, verified by IEC and approved by EPD prior to the commencement of baseline monitoring works. The purpose of the baseline monitoring is to establish ambient conditions prior to the commencement of the works and to demonstrate the suitability of the proposed monitoring stations.
- 4.26 The baseline conditions will be established by measuring all the water quality parameters for the construction phase monitoring as illustrated in **Table 4.5** prior to the commencement of marine works.
- 4.27 Two consecutive measurements will be taken at each monitoring stations W1, W2 and W3 at 1 m below surface, mid-depth and 1m above bottom in-situ at mid-flood and midebb tides, 4 times a week for a period of 2 weeks. If the two consecutive readings do not agree to within 25%, the readings will be discarded and repeated.
- 4.28 Logging of the water quality parameters stipulated in **Table 4.5** will be undertaken at monitoring station WS every 5 minutes for complete working day for 12 hours between 0700 and 1900 at approximately mid-depth.
- 4.29 There will not be any marine construction activities in the vicinity of the stations during the baseline monitoring.
- 4.30 In exceptional cases when insufficient baseline monitoring data or questionable results are obtained, the ET Leader will seek approval from IEC and EPD on an appropriate set of data to be used as baseline reference.
- 4.31 Sample of water quality field data sheet is attached in **Appendix C**.

# **Impact Monitoring**

- 4.32 During construction of the off-loading facilities, two consecutive measurements of DO (in both mg/l and % saturation) and turbidity (NTU) will be taken at each monitoring stations W1, W2 and W3 at 1 m below surface, mid-depth and 1m above bottom in-situ at mid-flood and mid-ebb tides, 3 times a week. If the two consecutive readings do not agree to within 25%, the readings will be discarded and repeated. Duplicate water samples for SS will be taken and analysed.
- 4.33 Logging of the water quality parameters stipulated in **Table 4.5** will be undertaken at monitoring station WS every 5 minutes for complete working day for 12 hours between 0700 and 1900 at approximately mid-depth.
- 4.34 Statistical analysis, e.g., One Way Analysis of Variance (ANOVA)<sup>1</sup> will be applied to check if the baseline monitoring data for parameters DO, Turbidity and SS collected at each station are significantly different with that collected at other stations. The data at each routine monitoring station (W1 to W3) at each tide will be arranged in four different groups, including DO (surface and middle depth), DO (bottom depth), turbidity (depth-average) and SS (depth-average) for the analysis. If no significant difference is observed, the A/L levels for the parameters will be derived from the pooled data of all the stations. Otherwise, the A/L levels will be calculated separately for each specific group of stations in which no significant difference in the baseline data is observed.
- 4.35 The A/L levels will be derived with agreement from EPD following the completion of the baseline monitoring. The A/L levels will be calculated as outlined in **Table 4.6**.

### Event and Action Plan for Water Quality

4.36 When the monitoring results of the water quality parameters at any designated monitoring stations exceed the water quality criteria, the actions in accordance with the Event/Action Plan in **Table 4.7** will be carried out.

#### **Operational Phase Monitoring**

4.37 Effluent from non-active sources is expected to comprise of foul effluent from toilets and sinks/washbasins in other areas of the facility. Ventilated dry latrine type toilets will be used at the facility unless otherwise agreed by the EPD. No operational phase monitoring and special mitigation measures will be required.

<sup>&</sup>lt;sup>1</sup> The analysis is a technique used to test the null hypothesis that multiple population means are all equal. If the calculated P value is less than 0.05, then one can accept the hypothesis that there is an influence of the qualitative fact on the data, or that the means of at least two of the groups of data differ significantly.

Table 4.6

# Action and Limit Levels for Water Quality

Parameter	Action Level	Limit Level
DO in mg/L	Surface & Middle	Surface & Middle
(Surface, Middle &	5%-ile of baseline	4 mg/L except 5mg/L for Fish
Bottom)	data for surface and	Culture Zone or
	middle layer.	1%-ile of baseline data for surface
		and middle layer.
	Bottom	
	5%-ile of baseline	Bottom
	data for bottom layer.	$\frac{2 \text{ mg/L}}{2 \text{ or}}$
		1%-ile of baseline data for bottom
		layer.
Turbidity (Tby) in NTU	95%-ile of baseline	99%-ile of baseline data or 130%
(depth-average)	data or 120% of	of upstream control station's Tby
	upstream control	at the same tide of the same day
	station's Tby at the	
	same tide of the same	
	day	
SS in mg/L	95%-ile of baseline	99%-ile of baseline data or 130%
(depth-average)	data or 120% of	of upstream control station's SS at
	upstream control	the same tide of the same day and
	station's SS at the	specific sensitive receiver water
	same tide of the same	quality requirements (e.g. required
	day	suspended solids level for
New		concerned sea water intakes)

#### Notes:

- This table is extracted from Table 3.1 of Environmental Monitoring and Audit Guidelines for Development Projects in Hong Kong.
- For DO. non-compliance of the water quality limits occurs when monitoring results is lower than the limits.
- For SS and Tby, non-compliance of the water quality limits occurs when monitoring results is higher than the limits.
- All the figures given in the table are used for reference only and the EPD may amend the figures whenever it is considered as necessary.
- %-ile denotes percentile
- depth-average denotes the average values obtained from the three depths

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Event and Action Plan for Water Quality Table 4.7

		CONTRACTOR	Inform the ER and confirm notification of the non-compliance in writing;     Rectify unacceptable practice;     Check all plant and equipment;     Consider changes of working methods;     Discuss with ET and IEC and propose mitigation measures to IEC and ER;     Implement the agreed mitigation	1. Inform the ER and confirm notification of the non-compliance in writing; 2. Rectify unacceptable practice; 3. Check all plant and equipment; 4. Consider changes of working methods; 5. Discuss with ET and IEC and propose mitigation measures to IEC and ER within 3 working days; 6. Implement the agreed mitigation measures.
ACTION		ER	Discuss with IEC on the proposed mitigation measures;     Make agreement on the mitigation measures to be implemented.	Discuss with IEC on the proposed mitigation measures;     Make agreement on the mitigation measures to be implemented;     Assess the effectiveness of the implemented mitigation measures.
154	291	IEC	Discuss with ET and Contractor on the mitigation measures;     Review proposals on mitigation measures submitted by Contractor and advise the ER accordingly;     Assess the effectiveness of the implemented mitigation measures.	Discuss with ET and Contractor on the mitigation measures;     Review proposals on mitigation measures submitted by Contractor and advise the ER accordingly;     Assess the effectiveness of the implemented mitigation measures.
	T3		Repeat in-situ measurement to confirm findings;     Identify source(s) of impact;     Inform IEC, Contractor and ER;     Check monitoring data, all plant, equipment and Contractor's working methods;     Discuss mitigation measures with IEC and Contractor;     Repeat measurement on next day of exceedance.	1. Repeat in-situ measurement to confirm findings; 2. Identify source(s) of impact; 3. Inform IEC, Contractor and ER; 4. Check monitoring data, all plant, equipment and Contractor's working methods; 5. Discuss mitigation measures with IEC, Contractor and ER; 6. Ensure mitigation measures are implemented; 7. Prepare to increase the monitoring frequency to daily; 8. Repeat measurement on next day of exceedance.
EVENT	E V EIV I	ACTION LEVEL	Action level being exceeded by one sampling day	Action level being exceeded by two or more consecutive sampling days

ET = Environmental Team IEC = Independent Environmental Checker ER = Employer's Representative

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		CONTRACTOR	I. Inform the ER and confirm notification of the non-compliance in writing;     Rectify unacceptable practice;     Check all plant and equipment     Consider changes of working methods;     Discuss with ET, IEC and ER and propose mitigation measures to IEC and ER within 3 working days;     Implement the agreed mitigation measures.      Inform the ER and confirm notification of the non-compliance in writing     Rectify unacceptable practice;     Check all plant and equipment     Consider changes of working methods;     Discuss with ET, IEC and ER and propose mitigation measures to IEC and ER within 3 working days;     Implement the agreed mitigation measures.     As directed by the ER, to slow down or to stop all or part of the marine work or construction activities.
ACTION	G H	EN	Discuss with IEC, ET and Contractor on the proposed mitigation measures;     Request Contractor to critically review the working methods;     Make agreement on the mitigation measures to be implemented;     Assess the effectiveness of the implemented mitigation measures.      Contractor on the proposed mitigation measures;     Request Contractor to critically review the working methods;     Make agreement on the mitigation measures to be implemented;     Assess the effectiveness of the implemented mitigation measures;     Consider and instruct, if necessary, the Contractor to slow down or to stop all or part of the marine work until no exceedance of Limit level.
ACT	IEC		Discuss with ET and Contractor on possible mitigation measures;     Review the proposed mitigation measures submitted by Contractor and advise the ER accordingly;     Assess the effectiveness of the implemented mitigation measures;     Review the proposed mitigation measures;     Review the proposed mitigation measures submitted by Contractor and advise the ER accordingly;     Assess the effectiveness of the implemented mitigation measures.  Assess the effectiveness of the implemented mitigation measures.
	ET		1. Repeat in-situ measurement to confirm findings; 2. Identify source(s) of impact; 3. Inform IEC, Contractor, ER and EPD; 4. Check monitoring data, all plant, equipment and Contractor's working methods; 5. Discuss mitigation measures with IEC, ER and Contractor; 6. Ensure mitigation measures are implemented; 7. Increase the monitoring frequency to daily until no exceedance. 1. Repeat in-situ measurement to confirm findings; 2. Identify source(s) of impact; 3. Inform IEC, Contractor, ER and EPD; 4. Check monitoring data, all plant, equipment and Contractor's working methods; 5. Discuss mitigation measures with IEC, ER and Contractor; 6. Ensure mitigation measures are implemented; 7. Increase the monitoring frequency to daily until no exceedance of Limit level for two consecutive days.
EVENT	1 18 41 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1	LIMII LEVEL	Limit level being exceeded by one sampling day  Limit level being exceeded by two or more consecutive sampling days  Remarks: ET =

IEC = Independent Environmental Checker ER = Employer's Representative

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# Water Quality Mitigation Measures

4.38 The implementation schedule for recommended mitigation measures is presented in **Appendix A**.

#### **Construction Phase**

- 4.39 The Contractor will be responsible for the design and implementation of these mitigation measures. These include:
  - Unnecessary disturbance to the seabed will be minimised by exerting care when lowering and lifting the tools/equipment into seabed;
  - All vessels will be sized such that adequate clearance (i.e. minimum clearance of 0.6m) is maintained between vessels and the seabed in all tide conditions, to ensure that undue turbidity is not generated by turbulence from vessel movement or propeller wash;
  - Use of silt curtains surrounding the dredger and the dredged area during dredging;
  - Barges will be used which are fitted with tight fitting seals to their bottom openings to prevent leakage of material;
  - Barge loading will be ensured accurately to avoid splashing of loading material to the surrounding water;
  - Adequate freeboard (i.e. minimum of 200mm) will be maintained on barges to ensure that decks are not washed by wave action;
  - Grabs (if any) will be closed tightly and that hoist speeds will be suitably low;
  - No visible foam, oil, grease, scum, litter or other objectionable matter will be present in the water within the site or dumping grounds;
  - Appropriate monitoring of water quality will be undertaken to allow the implementation of appropriation action plans to prevent unacceptable water quality impacts;
  - Carry out earth works in dry season as much as possible;
  - Cover areas of exposed earth;
  - Install sand traps or catchpits at all drainage discharge points;
  - Oil and fuel bunkers to be bunded:
  - Immediate disposal and correct handling of any chemical spill; and
  - Prevent surface runoff into coastal water through construction of bunds between works area and sea shore.

#### Worker Generated Waste

• Provide proper sewage treatment facilities for site workers.

#### **Operational Phase**

- 4.40 Waste water generated during operations will either be an active stream or an in-active stream. A monitoring tank will be provided at the facility to intercept all active water. The contents of the tank will be monitored for radioactivity prior to being pumped out or otherwise treated prior to disposal, assuming that agreement on discharge limits has been reached with EPD. Details of the drainage arrangement will be mentioned in EM&A Manual (Part 2 Radiological).
- 4.41 Effluent from non-active sources is expected to comprise of foul effluent from toilets and sinks/washbasins in other areas of the facility. Ventilated dry latrine type toilets will be used at the facility unless otherwise agreed by the EPD. No operational phase monitoring will be required.
- 4.42 The mitigation measures stipulated in Sections 2.7 to 2.9 of EP and are summarized as follows will be provided:
  - LRWF shall be operated as dry facility with no production of radioactive liquid effluent.
  - Ventilated dry latrine type toilets shall be used at the LRWF unless otherwise agreed by the Director.
  - Electric powered vehicles shall be used at the LRWF unless otherwise agreed by the Director.

#### 5 ECOLOGY

- A detailed inventory and abundance assessment of the plant species present on the site will be collected for the purposes of record and establishing replacement vegetation. The vegetation survey will be undertaken prior to carrying out any work on site.
- 5.2 Regular monitoring will take place on the stored topsoil/turf to ensure that it is in a reasonably healthy state for reuse at the end of construction.

#### **Ecological Mitigation Measures**

#### **Construction Phase**

- Programme the jetty construction period outside critical seasons (e.g. from October to December inclusively).
- 5.4 An exclusion zone of 250 m radius around piling activities should be scanned for 30 minutes prior to the start of the piling. If marine mammals are not sighted within the time, piling may commence.
- 5.5 Implement the mitigation measures as stipulated in **Appendix A.**

#### **Operational Phase**

- 5.6 As mentioned in Section 5.3, not only completion of the jetty will not bring adverse effect to the ecology but also provides opportunities to create new underwater surfaces to marine life. Left to be concerned during operation will be the radioactive influence on marine life. Potential for bio-accumulation and trophic transfer up the food chain will be presented in the EM&A Manual (Radiological). Non-radiological ecological monitoring during operational phase is considered not necessary.
- 5.7 The mitigation measures stipulated in Section 2.6 of the EP will be provided. These measures include:
  - The grassland and low shrub habitat affected by the construction works shall be restored with the use of native, local grass and shrub species.
  - Shotcrete shall not be used for re-establishment of the cut slope behind the LRWF.

#### **6 WASTE MANAGEMENT**

# Waste Management Plan (WMP)

- 6.1 A Waste Management Plan (WMP) will be prepared by the Contractor as required by the Specification Vol.3 of the Contract No. EP/SP/40/02.
- 6.2 The WMP, which will be approved by the Engineer, will includes, but not limited to the following items:
  - a chart setting out the roles and responsibilities of the Contractor's personnel responsible for waste management and appropriate mitigation measures;
  - an analysis and schedule of when, what quantities and type of construction and demolition (C&D) materials are anticipated to be generated in the course of the execution of the Works;
  - proposals for avoidance / minimization of the generation of C&D materials;
  - a figure showing a specific area on site to facilitate sorting of C&D material;
  - a proposal for handling, recycling, re-use and return of the suitable C&D material;
  - identification of the chemical waste to be generated and proposed means of handling of chemical waste;
  - a proposal for minimizing, storage and disposal of general refuse;
  - a proposal specifying the disposal outlets and means of transportation of the C&D material;
  - a proposal of how the Contractor will maintain the Site in a clean and tidy condition;
  - a monitoring and auditing proposal to ensure that the requirements of the WMP are properly implemented;
- 6.3 The Contractor shall keep adequate and proper records (such as delivery docket, photographs and measurement records) relating to the implementation of the WMP and submit such records of each calendar month to the EPD within the first week of the following calendar month.
- 6.4 The Contractor shall be required to submit a report on the implementation of the WMP in a form to be agreed by EPD after the completion of the Contract. The report shall include the following information and any other information as the Employer may consider appropriate:
  - a) The quantities of different types of C&D material as estimated at the commencement of the Contract;
  - b) A statistics on the monthly quantities of different types of C&D material generated and their disposal method; and
  - c) Reasons for any significant difference between the estimated quantities at (a) and the actual quantities at (b).
- 6.5 The Contractor will review the WMP at monthly intervals and submit a revised and updated WMP if necessary.

# Waste Management Mitigation Measures

Construction Phase

#### Liquid Waste

- 6.6 The Contractor will not permit any sewage, waste water or effluent containing sand, cement, silt or any other suspended or dissolved material to flow from the site onto any adjoining land or sea or allow any waste matter or refuse to be deposited anywhere within the site or onto adjoining land and will have all such matter removed from the site.
- 6.7 The Contractor will be liable for any damages caused to adjoining land through his failure to comply with Section 6.6.
- 6.8 The Contractor will be responsible for temporary training, diverting or conducting of open streams or drains intercepted by any works and for reinstating these to their original courses on completion of the Works.
- 6.9 The Contractor will be responsible for adequately maintaining any existing site drainage system at all times including removal of solids in sand traps, manholes and stream beds.
- 6.10 Any proposed stream course and nullah temporary diversions will be submitted to the Engineer for agreement one month prior to such diversion works being commenced. Diversions will be constructed to allow the water flow to discharge without overflow, erosion or washout. The area through which the temporary diversion runs is to be reinstated to its original condition or as agreed by the Engineer after the permanent drainage system has been completed.
- 6.11 The Contractor will furnish, for the Engineer's information, particulars of the Contractor's arrangements for ensuring that material from any earthworks does not wash into the drainage system. If at any time such arrangements prove to be ineffective the Contractor will take such additional measures as the Engineer will deem necessary and will remove all silt which may have accumulated in the drainage system whether with the Site or not.

#### Solid Waste

- 6.12 The Contractor will segregate all inert construction waste material suitable for reclamation or land formation and will dispose of such material at such public dumping area(s) as may be specified from time to time by the Director of Civil Engineering Services.
- 6.13 Inert material deemed unsuitable for reclamation or land formation and all non-inert construction waste material deemed unsuitable for reclamation or land formation and all other waste material will be disposed of at a public landfill.
- 6.14 Chemical waste as defined by Schedule 1 of the Waste Regulations (Chemical 1992), will be stored in accordance with approved methods defined in the Regulations and the chemical waste disposed of at the Chemical Waste Treatment Facility located at Tsing

Yi.

6.15 Any dredged material will be disposed of at an approved marine dumping ground.

# Operational Phase

6.16 The Contractor will operate the Facility under the principle of minimising the volume of consumables or other materials that will be taken into areas where potential radioactive contamination exists, to minimise the generation of contaminated waste. Volumes of material entering the active areas are to be kept to a minimum, for instance by the removal of packaging from incoming waste, prior to transfer into the active areas and only allowing essential items into such areas.

# 7 SITE ENVIRONMENTAL AUDIT

# Site Inspections / Audits

- 7.1 Site Inspections / Audits provide a direct means to trigger and enforce the specified environmental protection and pollution control measures. They will be undertaken routinely to inspect the construction activities in order to ensure that appropriate environmental protection and pollution control mitigation measures are properly implemented. With well defined pollution control and mitigation specifications and a well established site inspection, deficiency and action reporting system, the site inspection is one of the most effective tools to enforce the environmental protection requirements on the construction site.
- 7.2 The ET Leader is responsible for formulation of the environmental site inspection, deficiency and action reporting system, and for carrying out the site inspection works. He will submit a proposal on the site inspection, deficiency and action reporting procedures within 21 days of the contract commencement to the Contractor for agreement and to the ER and the IEC for approval.
- 7.3 Regular site inspection / audit will be carried out in conjunction with the construction compliance monitoring programme and the inspection / audit will be conducted during each monitoring event. The areas of inspection will not be limited to the environmental situation, pollution control and mitigation measures within the site; the ET will also review the environmental situation outside the site area which is likely to be affected, directly or indirectly, by the site activities. The ET will make reference to the following information in conducting the inspection:-
  - (a) the EIA recommendations on environmental protection and pollution control mitigation measures;
  - (b) works progress and programme;
  - (c) individual works methodology proposals (which will include proposal on associated pollution control measures);
  - (d) the contract specifications on environmental protection;
  - (e) the relevant environmental protection and pollution control laws; and
  - (f) previous site inspection results.
- 7.4 The Contractor will update the ET Leader with all relevant information of the construction contract for the ET Leader to carry out the site inspections. The inspection results and its associated recommendations on improvements to the environmental protection and pollution control works will be submitted to the ER and the Contractor within 24 hours, for reference and for taking immediate action. The Contractor will follow the procedures and time-frame as stipulated in the environmental site inspection, deficiency and action reporting system formulated by the ET Leader to report on any remedial measures subsequent to the site inspection.
- 7.5 Ad hoc site inspections will also be carried out if significant environmental problems are identified. Inspections may also be required subsequent to receipt of an environmental, or as part of the investigation work, as specified in the Action Plan for environmental monitoring and audit.

# Compliance with Legal and Contractual Requirements

- 7.6 There are contractual environmental protection and pollution control requirements as well as environmental protection and pollution control laws in Hong Kong which the construction activities will comply with. In order that the works are in compliance with the contractual requirements, all the works of method statements submitted by the Contractor to the ER for approval will also be sent to the ET Leader for vetting to see whether sufficient environmental protection and pollution control measures have been included.
- 7.7 The ET Leader will also review the progress and programme of the works to check that relevant environmental laws have not been violated, and that the any foreseeable potential for violating the laws can be prevented.
- 7.8 The Contractor will regularly copy relevant documents to the ET Leader so that the checking work can be carried out. The document will at least include the updated Work Progress Reports, the updated Works Programme, application letters for different license/permits under the environmental protection laws, and all valid licenses/permits. The site diary will also be available for the ET Leader's inspection upon his request.
- 7.9 After reviewing the document, the ET Leader will advise the ER and the Contractor of any non-compliance with the contractual and legislative requirements on environmental protection and pollution control for them to take follow-up actions. If the ET Leader's review concludes that the current status on licence/permit application and any environmental protection and pollution control preparation works may not cope with the works programme or may result in potential violation of environmental protection and pollution control requirements by the works in due course, he will also advise the Contractor and the ER accordingly.
- 7.10 Upon receipt of the advice, the Contractor will undertake immediate action to remedy the situation. The ER will follow up to ensure that appropriate action has been taken by the Contractor in order that the environmental protection and pollution control requirements are fulfilled.

#### **Environmental Complaints**

- 7.11 Complaints will be referred to the ET Leader for carrying out complaint investigation procedures. The ET Leader will undertake the following procedures upon receipt of the complaints:
  - (a) log complaint and date of receipt onto the complaint database;
  - (b) investigate the complaint to determine its validity, and to assess whether the source of the problem is due to works activities;
  - (c) if a complaint is valid and due to works, identify mitigation measures;
  - (d) if mitigation measures are required, advise the Contractor accordingly;
  - (e) review the Contractor's response on the identified mitigation measures, and the updated situation;
  - (f) if the complaint is transferred from EPD, submit interim report to EPD on status of the complaint investigation and follow-up action within the time frame assigned by EPD;

- (g) undertake additional monitoring and audit to verify the situation if necessary, and review that any valid reason for complaint does not recur;
- (h) report the investigation results and the subsequent actions to the source of complaint for responding to complainant (If the source of complaint is EPD, the results will be reported within the time frame assigned by EPD); and
- (i) record the complaint, investigation, the subsequent actions and the results in the monthly EM&A reports.
- 7.12 During the complaint investigation work, the Contractor and ER will cooperate with the ET Leader in providing all the necessary information and assistance for completion of the investigation. If mitigation measures are identified in the investigation, the Contractor will promptly carry out the mitigation. The ER will ensure that the measures have been carried out by the Contractor.
- 7.13 A flow chart of the complaint response procedures is shown in Figure 7.1.
- 7.14 A sample of complaint log sheet is provided in **Appendix D**.

#### 8 REPORTING

#### General

8.1 The following reporting requirements based upon a paper documented approach. However, the same information can be provided in an electronic medium upon agreeing the format with the ER and EPD and complying with the requirements stipulated in Sections 4.1 and 4.2 of the EP. All monitoring data (baseline and impact) will also be submitted in diskettes in a format agreed by ER and EPD.

# **Baseline Monitoring Report**

- 8.2 The ET Leader will prepare and submit a Baseline Environmental Monitoring Report. The report will be verified and certified by IEC prior to submission to EPD at least two weeks before the commencement of construction of the Project. Copies of the Baseline Environmental Monitoring Report will be submitted to each of the four parties: the Contractor, the IEC, the ER and the EPD. The ET Leader will liaise with the relevant parties on the exact number of copies they want. The format and content of the report, and the representation of the baseline monitoring data will be in a format to the satisfaction of EPD and include, but not be limited to the following:
  - (a) Up to half a page executive summary;
  - (b) Brief project background information;
  - (c) drawings showing locations of the baseline monitoring stations;
  - (d) monitoring results (in both hard and diskette copies) together with the following information:
    - monitoring methodology;
    - equipment used and calibration details;
    - parameters monitored;
    - monitoring locations (and depth); and
    - monitoring date, time, frequency and duration;
  - (e) details on influencing factors, including:
    - major activities, if any, being carried out on the site during the period;
    - weather conditions during the period; and
    - other factors which might affect the results.
  - (f) determination of the A/L levels for each monitoring parameter and statistical analysis of the baseline data, the analysis will conclude if there is any significant different between control and impact stations for the parameters monitored;
  - (g) revisions for inclusion in the EM&A Manual, and
  - (h) comments and conclusions.

# **EM&A Reports**

- 8.3 The results and findings of all EM&A work required in the Manual will be recorded in the monthly EM&A reports prepared by the ET Leader. The EM&A report will be prepared and submitted within two weeks after the end of each reporting month, with the first report due in the month after construction commences. For the operational phase EM&A programme, the EM&A reports will be submitted monthly for the first 6 months and subsequent EM&A reports will be commissioned at 12 monthly intervals if the initial EM&A indicates no potential problems. The EM&A reports will be certified by ET Leader and verified by the IEC prior to submission to DEP. A maximum of 4 copies of each monthly EM&A report will be submitted to each of the four parties: the Contractor, the ER, the IEC and EPD. Before submission of the first EM&A report, the ET Leader will liaise with the parties on the exact number of copies and format of the monthly reports in both hard copy and electronic medium requirement.
- 8.4 The ET Leader will review the number and location of monitoring stations and parameters to monitor every 6 months or on as needed basis in order to cater for the changes in surrounding environment and nature of works in progress.

# First Monthly EM&A Report

- 8.5 The first monthly EM&A report will consider the findings of results and data obtained during the establishment of baseline conditions of the environmental parameters and will include at least the following:
  - (a) executive summary 1-2 pages;
    - breaches of Action/Limit levels;
    - Complaint Log:
    - Notifications of any summons and successful prosecutions;
    - Reporting Changes;
    - Future key issues.
  - (b) Basic project information;
    - Project organization including key personnel contact names and telephone numbers;
    - Construction Programme with fine tuning of construction activities showing the inter-relationship with environmental protection/mitigation measures for the month;
    - Management structure; and
    - Works undertaken during the month;
  - (c) Environmental Status
    - Works undertaken during the month with illustrations (such as location of works)
    - Drawing showing the project area, any environmental sensitive receivers and the locations of the monitoring and control stations.
  - (d) a brief summary of EM&A requirements including:
    - all monitoring parameters;
    - environmental quality performance limits (A/L levels);

- environmental mitigation measures, as recommended in the project EIA study final report and
- environmental requirements in contract documents;

# (e) Implementation Status

- advice on the implementation status of environmental protection and pollution control/mitigation measures, as recommended in the project EIA study report, summarized in the updated implementation schedule; and
- advice on the status of submissions required under the EP and the status of compliance with EP's conditions.

# (f) Monitoring results (in both hard and diskette copies)

- monitoring methodology
- name of laboratory and types of equipment used and calibration details
- parameters monitored
- monitoring locations (and depth)
- monitoring date, time, frequency, and duration; weather conditions during the period;
- any other factors which might affect the monitoring results;
- QA/QC results and detection limits;
- all monitoring results will be tabulated with exceedances highlighted for ease of referencing; and
- graphical plots of trends of monitored parameters over the past reporting periods.

# (g) Report on non-compliance, complaints, notifications of summons and successful prosecutions

- record of all non-compliance (exceedances) of the environmental quality performance limits (A/L levels);
- record of all complaints received (written or verbal) for each media, including locations and nature of complaints, liaison and consultation undertaken, actions and follow-up procedures taken, results and summary;
- record of all notifications of summons and successful prosecutions for breaches of the current environmental protection/pollution control legislations, including locations and nature of the breaches, investigation, follow-up action taken, results and summary;
- review of the reasons for and the implications of non-compliance, complaints, summons and prosecutions including review of pollution sources and working procedures; and
- description of the actions taken in the event of non-compliance and deficiency reporting and any follow-up procedures related to earlier non-compliance

#### (h) Others

- an account of the future key issues as reviewed from the works programme and work method statements;
- advice on the solid and liquid waste management status; and
- submission of implementation status proforma, proactive environmental protection proforma, regulatory compliance proforma, site inspection proforma, data recovery schedule and complaint log summarizing the EM&A of the period.

# Subsequent Monthly EM&A Reports

- The subsequent monthly EM&A reports will include the following: 8.6
  - (a) Executive Summary (1-2 pages)
    - Breaches of A/L levels
    - Complaint Log
    - Notifications of any summons and successful prosecution
    - Reporting Changes
    - Future key issues
  - (b) Basic project information
    - Project organization including key personnel contact names and telephone numbers:
    - Construction Programme with fine tuning of construction activities showing the inter-relationship with environmental protection/mitigation measures for the month;
    - Management structure; and
    - Works undertaken during the month;
  - (c) Environmental Status
    - Construction Programme with fine tuning of construction activities showing the inter-relationship with environmental protection/mitigation measures for the month
    - Works undertaken during the month with illustration including key personnel contact names and telephone numbers; and
    - Drawing showing the project area, any environmental sensitive receivers and the locations of the monitoring and control stations
  - (d) a brief summary of EM&A requirements including:
    - all monitoring parameters;
    - environmental quality performance limits (A/L levels);
    - Event-Action Plans;
    - environmental mitigation measures, as recommended in the project EIA study final report and
    - environmental requirements in contract documents;
  - (e) Implementation Status
    - advice on the implementation status of environmental protection and pollution control/mitigation measures, as recommended in the project EIA study report, summarised in the updated implementation schedule.
    - advice on the status of submissions required under the EP and the status of compliance with EP's conditions.
  - (f) Monitoring Results (in both hard and diskette copies)
    - Monitoring methodology
    - Name of laboratory and types of equipment used and calibration details
    - Parameters monitored

- Monitoring locations (and depth)
- Monitoring date, time, frequency, and duration;
- Weather conditions during the period;
- Any other factors which might affect the monitoring results;
- QA/QC results and detection limits
- all monitoring results will be tabulated with exceedances highlighted for ease of referencing.
- (g) Report on non-compliance, complaints, notifications of summons and successful prosecutions
  - Record of all non-compliance (exceedances) of the environmental quality performance limits (A/L levels);
  - Record of all complaints received (written or verbal) for each media, including locations and nature of complaints, liaison and consultation undertaken, actions and follow-up procedures taken, results and summary of complaints;
  - Record of all notifications of summons and successful prosecutions for breaches of the current environmental protection/pollution control legislations, including locations and nature of the breaches, investigation, follow-up action taken, results and summary;
  - Review of the reasons for and the implications of non-compliance, complaints, summons and prosecutions including review of pollution sources and working procedures; and
  - A description of the actions taken in the event of non-compliance and deficiency reporting and any follow-up procedures related to earlier non-compliance

# (h) Others

- An account of the future key issues as reviewed from the works programme and work method statements;
- Advice on the solid and liquid waste management status.

#### (i) Appendix

- A/L levels
- Graphical plots of trends of monitored parameters at key stations over the past four reporting periods for representative monitoring stations annotated against the following:
  - i) major activities being carried out on site during the period;
  - ii) weather conditions during the period; and
  - iii)any other factors which might affect the monitoring results
- Monitoring schedule for the present and next reporting period
- Cumulative statistics on complaints, notifications of summons and successful prosecutions; and
- Outstanding issues and deficiencies

#### **Quarterly EM&A Summary Reports**

- 8.7 The quarterly EM&A summary report which should generally be around 5 pages (including about 3 of text and tables and 2 of figures) should contain at least the following information:
  - (a) up to half a page executive summary;
  - (b) basic project information including a synopsis of the project organization, programme, contacts of key management, and a synopsis of work undertaken during the quarter;
  - (c) a brief summary of EM&A requirements including:
    - monitoring parameters;
    - environmental quality performance limits (A/L levels); and
    - environmental mitigation measures, as recommended in the Stage 1 EISA;
  - (d) advice on the implementation status of environmental protection and pollution control/mitigation measures, as recommended in the Stage 1 EISA, summarized in the updated implementation schedule;
  - (e) drawings showing the project area, any environmental sensitive receivers and the locations of the monitoring and control stations;
  - (f) graphical plots of the trends of monitored parameters over the past 4 months (the last month of the previous quarter and the present quarter) for representative monitoring stations annotated against;
    - the major activities being carried out on site during the period;
    - weather conditions during the period; and
    - any other factors which might affect the monitoring results;
  - (g) advice on the solid and liquid waste management status;
  - (h) a summary of non-compliance (exceedances) of the environmental quality performance limits (A/L levels);
  - (i) a brief review of the reasons for and the implications of non-compliance including review of pollution sources and working procedures;
  - (j) a summary description of the actions taken in the event of non-compliance and any follow-up procedures related to earlier non-compliance;
  - (k) a summary description of the actions taken in the event of non-compliance and any follow-up procedures related to earlier non-compliance;

(m) proponents = contact and any hotline telephone number for the public to make enquiries.

### Final EM&A Summary Report

- 8.8 The termination of EM&A programme will be determined on the following basis:
  - (a) completion of construction activities and insignificant environmental impacts of the remaining outstanding construction works;
  - (b) trends analysis to demonstrate the narrow down of monitoring exceedances due to construction activities and the return of ambient environmental conditions in comparison with baseline data; and
  - (c) no environmental complaint and prosecution involved.
- 8.9 The final EM&A report will contain at least the following information:
  - (a) an executive summary;
  - (b) basic project information including a synopsis of the project organization, programme, contacts of key management, and a synopsis of work undertaken during the entire construction period;
  - (c) a brief summary of EM&A requirements including:
  - (d) advice on the implementation status of environmental protection and pollution control/mitigation measures, summarized in the updated implementation status proformas;
  - (e) drawings showing the project area, any environmental sensitive receivers and the locations of the monitoring and control stations;
  - (f) graphical plots and the statistical analysis of the trends of monitored parameters over the construction project for representative monitoring stations annotated against;
  - (g) provide clear-cut decisions on the environmental acceptability of the project with reference to the specific impact hypothesis;
  - (h) advice on the solid and liquid waste management status;
  - (i) a summary of noncompliance (exceedances) of the environmental quality performance limits (A/L levels);
  - a brief review of the reasons for and the implications of non-compliance including review of pollution sources and working procedures;
  - (k) a summary description of the actions taken in the event of non-compliance and any follow-up procedures related to earlier non-compliance;
  - (l) a summary record of all complaints received (written or verbal) for each media, liaison and consultation undertaken, actions and follow-up procedures taken;
  - (m) review the monitoring methodology adopted and with the benefit of hindsight, comment on its effectiveness (including cost effectiveness);
  - (n) a summary record of notifications of summons and successful prosecutions for breaches of the current environmental protection/pollution control legislations, locations and nature of the breaches, investigation, follow-up actions taken and results;
  - (o) review the monitoring methodology adopted and with the benefit of hindsight; comment on its effectiveness (including cost effectiveness)

a summary record of notifications of summons and successful prosecutions for (p) breaches of the current environmental protection/pollution control legislations, locations and nature of the breaches, investigation, follow-action taken and results; reviews the practically and effectiveness of the EM&A programme (e.g. effectiveness and efficiency of if the mitigation measures), recommend any improvement in the EM&A programme; and a conclusion to state the return of ambient and/or the predicted scenario as per EIA findings.

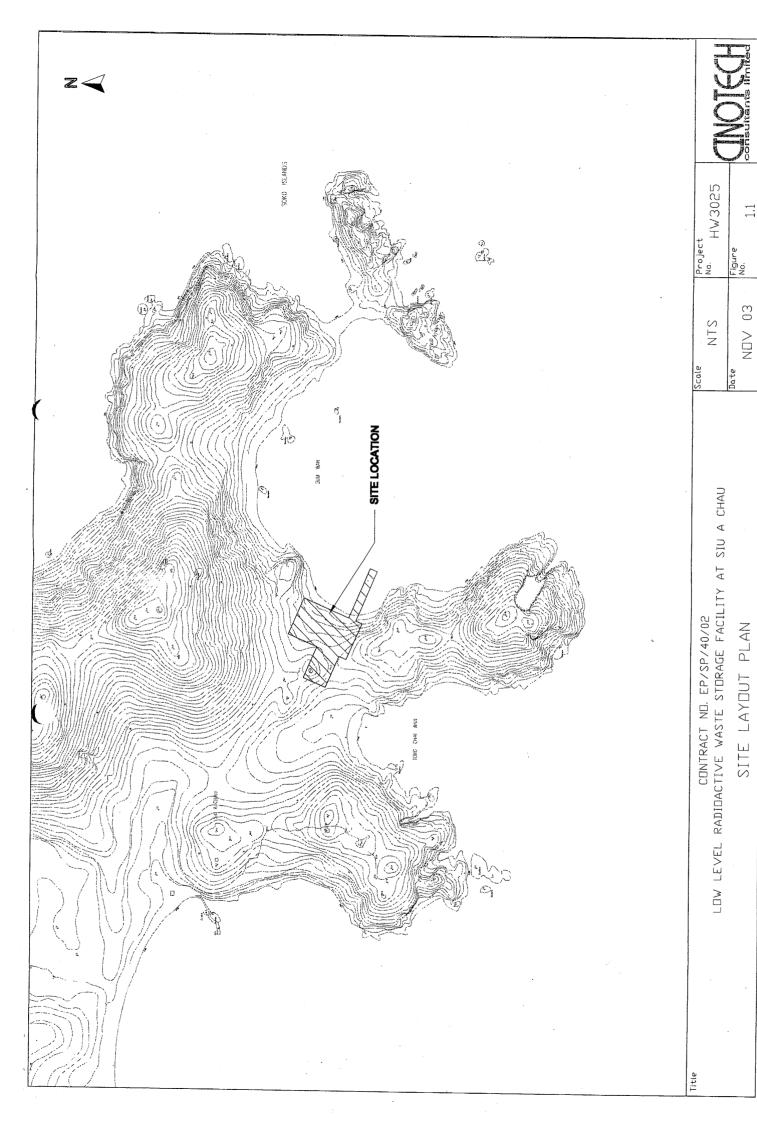
#### **Data Keeping**

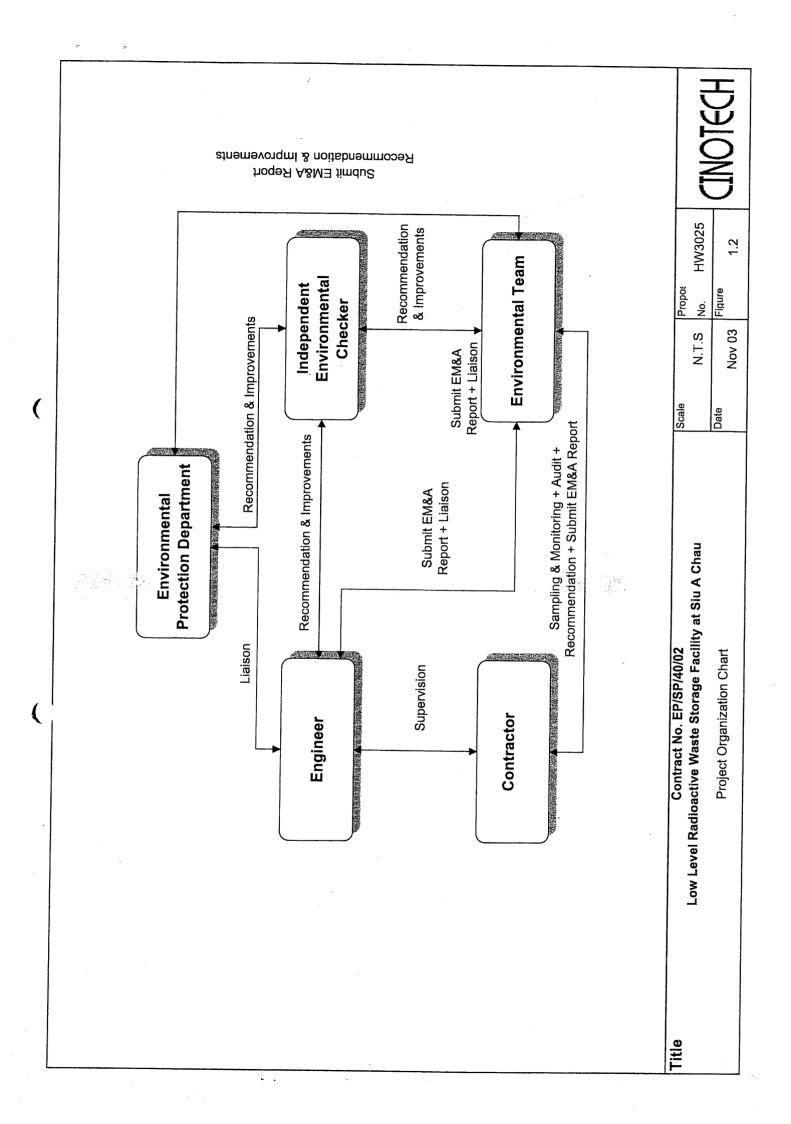
- 8.10 The site document such as the monitoring field records, laboratory analysis records, site inspection forms, etc. are not required to be included in the monthly EM&A reports for submission. However, the document will be well kept by the ET Leader and be ready for inspection upon request. All relevant information will be clearly and systematically recorded in the document. The monitoring data will also be recorded in magnetic media form, and the software copy can be available upon request. All the documents and data will be kept for at least one year after completion of the Contract.
- 8.11 A software copy of the monitoring data (including baseline data) will be submitted to EPD along with the EM&A reports.

## Interim Notifications of Environmental Quality Limit Exceedances

8.12 With reference to Event/Action Plans in Table 4.6, when the environmental quality limits are exceeded, the ET will immediately notify the ER, the IEC, and EPD, as appropriate. The notification will be followed up with advice to IEC and EPD on the results of the investigation, proposed action and success of the action taken, with any necessary follow-up proposals. An interim notifications form is shown in Appendix E for reference.

### **FIGURES**

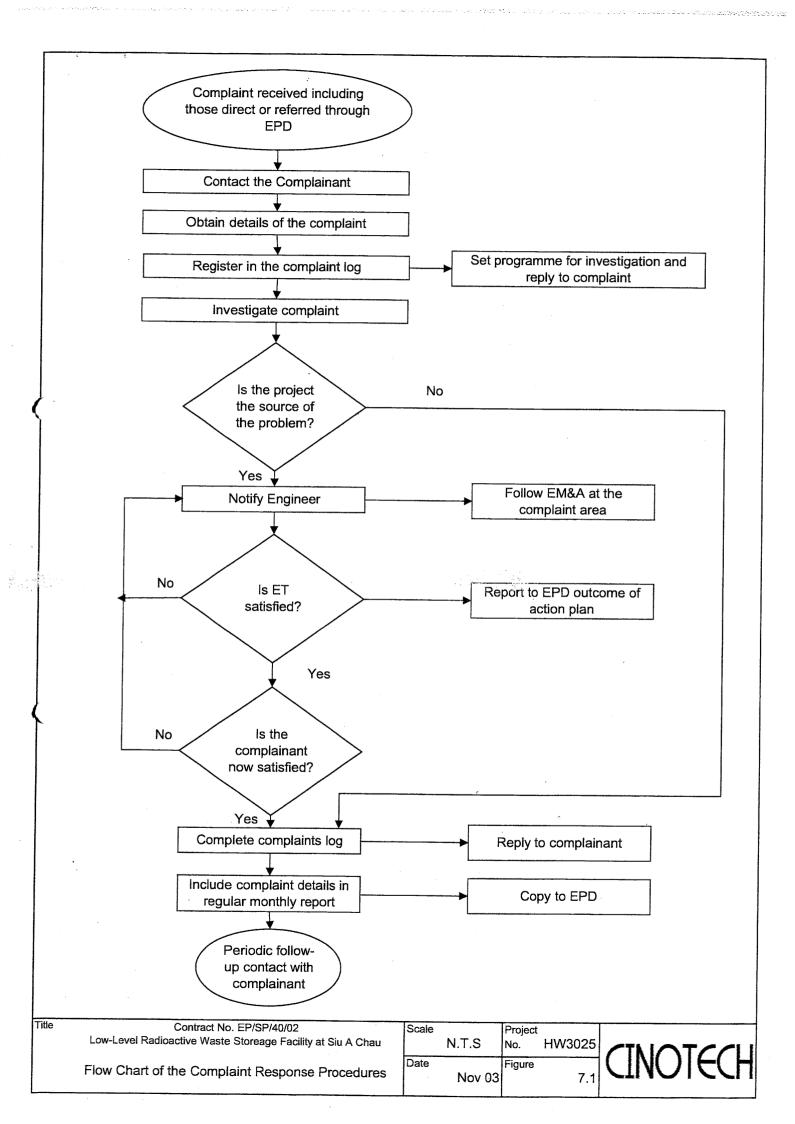




- WATER MONITORING STATION WITH LOGGING WATER QUALITY INSTRUMENT - WATER SAMPLING STATIONS SOKO ISLANDS LEGEND **MS** W3 O SOUTH OF SOUTH O M128 800 800 11.28 800 11.28 W2 O O SOCKELAR SOCKELAR WS © SOURCE OF S

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CONTRACT NO. EP/SP/40/02
LOW LEVEL RADIDACTIVE WASTE STORAGE FACILITY AT STU A CHAU
PROPOSED LOCATIONS OF WATER SAMPLING STATION



APPENDIX A IMPLEMENTATION SCHEDULE OF MITTIGATION MEASURES

Appendix A – Environmental Mitigation Implementation Schedule (EMIS) (Non-Radiological)

EISA Ref.	EM&A Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to	Who to implement the	Location of the measure	When to implement the	What requirements or standards for the measure
		Noise	address	measure;		measure?	to achieve?
B2.2(i)		The noise level measured at 1m from the most affected external façade of any noise sensitive receivers from the construction work alone during any 30 minute period shall not exceed an equivalent sound level (Leq) of 75 dB(A).	Control construction noise	))	Whole site	C	Tender Specification 2.13.2 (i)
B2.3	1	Before the commencement of any work, the Employer may require the methods of working, equipment and sound-reducing measures intended to be used on the Site to be made available for inspection and approval to ensure that they are suitable for the project.	Reduce construction noise impact	22	Whole site	O	Tender Specification 2.13.2 (ii)
B2.4	1	The Contractor shall devise, arrange methods of working and carry the Works in such a manner so as to minimize noise impacts on the surrounding environmental, and shall provide experienced personnel with suitable training to ensure that these methods are implemented.	Reduce construction noise impact	22	Whole site	O	Tender Specification 2.13.2 (iii) and 2.11.4
,		The nature and routing of construction plant both within and outside the Site limits shall be subject to the Employer's approval. Plant used for construction shall be effectively silenced and deployed in such a manner so as to cause as little nuisance to the public as possible.	Reduce construction noise impact	20	Whole site	U	Tender Specification 2.13.2 (iv)
B2.5 2	2.3	The Contractor shall ensure that all plant and equipment to be used on Site are properly maintained in good operating condition and noisy construction activities shall be effectively sound-reduced by means of silencers, mufflers, acoustic linings or shields or screens or other means to avoid disturbance to any nearby noise sensitive receivers.	Reduce construction noise impact	20	Whole site	U	Tender Specification 2.13.2 (v) and 2.11.4
B2.6		Notwithstanding the requirement set out in clause B2.2(i) of EISA Ref. above and subject to compliance with statutory requirements, the Employer may upon application in writing by the Contractor, allow the use of any equipment and the carrying out of any construction activities provided that he is	Reduce construction noise impact	a o	Whole site	U	Tender Specification 2.13.2 (vi)

	FM&A		Objectives of the				
EISA Ref.		Recommended Mitigation Measures	Recommended Measure	Who to implement the measure?	Location of the measure	When to implement the	What requirements or standards for the measure
		satisfied the application is of absolute necessity or of emergency nature, and not in contravention with the Noise Control Ordinance in any respect.	address			measure?	to achieve?
B2.7		For the purposes of the above clauses, any domestic premises, hotels, hostel, temporary housing accommodation, hospital, medical clinic, educational institution, place of public worship, library, court of law, performing arts centre or office building shall be considered a noise sensitive receiver.	Reduce construction noise impact	SS	Whole site	O	Tender Specification 2.13.2 (vii) and 2.11.4
B2.8	2.4	The Contractor shall, when necessary, apply as soon as possible for a construction noise permit in accordance with the Noise Control (General) Regulations, display the permit as required and copy to the Employer.	Reduce construction noise impact	22	Whole site	O .	Tender Specification 2.13.2 (viii)
		Operational noise from the LRWF is subject to the provisions of the Noise Control Ordinance Environmental Guidelines for Planning in Hong Kong and the Technical Memorandum for the Assessment of Noise from Places other than Domestic Premises, Public Places or Construction Sites.	Control noise impact during operation	SS	Within	0	Tender Specification 2.11.4
		Air Quality					
B3.1	1	The Contractor shall undertake at all times to prevent dust nuisance as a result of his activities. Any air pollution control systems installed shall be operated whenever the plant is in operation.	Reduce construction dust	22	Whole site	U	Tender Specification 2.13.1 (i)
B3.2		The Contractor shall at its own cost, and to the satisfaction of the Employer, install effective dust suppression equipment and take such other measures as may be necessary to ensure that the statutory criteria are not exceeded.	Reduce construction dust	))	Whole site	O	Tender Specification 2.13.1 (ii)
			Reduce construction dust	22	Whole site	O	Tender Specification
53.4		Where dusty materials are being discharged to a vehicle from a conveying system at a fixed transfer point, a three-sided cooped enclosure with a flexible curtain across the entry shall be provided. Exhaust should be provided for this enclosure	Reduce construction dust	22	Whole site	C C	Tender Specification 2.13.1 (iv)
		מוחססומוז סוויי יסי					

What requirements or standards for the measure	to achieve?	Tender Specification 2.13.1 (v)	Tender Specification	Tender Specification 2.13.1 (vii)	Tender Specification 2.13.1 (viii)	Tender Specification 2.13.1 (ix)	Tender Specification 2.13.1 (x)	Tender Specification 2.11.1
When to implement the measure?	casar c:	U	U	v	O .	U	D)	D&O
Location of the measure		Whole site	Whole site	Whole site	Whole site	Whole site	Whole site	Within LRWF
Who to implement the measure?		J)	သ	J)	20	20	20	သ
Objectives of the Recommended Measure & Main Concerns to	4441	Reduce construction dust	Reduce construction dust	Reduce construction dust	Reduce construction dust	Avoid burning of debris or any other matter	Control bulk storage of cement or PFA	Operational requirement – negative pressure ventilation system
Recommended Mitigation Measures	and vented to a fabric filter system.	Stockpiles of sand and aggregate greater than 20m³ shall be enclosed on three sides, with a wall extending above the pile and 2 metres beyond the front of the pile. In addition, water sprays shall be provided and used both to dampen stored materials and when receiving raw material.	The Contractor shall frequently clean and water open areas to minimize the fugitive dust emissions.	The Contractor shall restrict all motorized vehicles to a maximum speed of 15 km per hr and confine haulage and delivery vehicles to designated roadways inside the site. Areas of roadway longer than 100m where movement of motorized vehicles exceeds 100 vehicular movements/day or as directed by the Employer shall be furnished with a flexible pavement surfacing.	Permanent conveyor belts shall be fitted with windboards, and conveyor transfer points and hopper discharge areas shall be enclosed to minimize emission of dust. All conveyors carrying materials which have the potential to create dust shall be totally enclosed and fitted with belt cleaners.	Unless specifically instructed by the Employer, the Contractor shall not light fires on Site for the burning of debris or any other matter.	Bulk storage of cement or pulverized fuel ash shall not be permitted.	Operational measures taken to protect workers in the LRWF, such as the negative pressure ventilation system (from less active to potentially most active areas), together with the use of control mechanisms including high efficiency particulate (HEPA) filters, will reduce the potential environmental impacts to negligible levels.
EM&A Ref.		1	1	1	1 3 1 3 S	7 0 0		3.9 8 8 8 8 6 6 6 8 8 8 8 8 8 8 8 8 8 8 8 8
EISA Ref.		B3.5	B3.6	B3.7	B3.8		33.9	1

What standar	measure? to achieve?  D&O Tender Specification 2.11.1			O EP-131/2002 and FEP-063/2003 Condition 2.7	C&O EP-131/2002 and FEP-063/2003 Condition
Location of the measure	Within LRWF			Within LRWF	Whole site
Who to implement the measure?	CC			22	သ
Objectives of the Recommended Measure & Main Concerns to	address Operational requirement – ventilation with filtration system			Control production of radioactive liquid effluent	Control sewage discharge
Recommended Mitigation Measures	The Low-level Radioactive Waste Storage Facility will require general ventilation, with a filtration system to trap dust from in-coming air, and remove air borne particles using a High Efficiency Particulate Air Filter from out-going air.  The following design and operation features shall be required to be incorporated by the Contractor:	all gases and emissions must pass through a High Efficiency Particulate Air Filter with an efficiency of at least 99.99%; the Facility must be kept under a negative pressure ventilation system (the direction of air currents being from areas least potentially radioactive or contaminated, to areas most potentially radioactive or contaminated); any air pollution control systems installed shall be operated continuously; the Contractor shall not install any furnace, boiler or other plant or equipment or use any fuel that might in any circumstance produce smoke or any other air pollution without the prior approval of the Independent Consultants and consent of the Employer; and the Contractor's attention is drawn to the Air Pollution Control Ordinance and its subsidiary legislation, particularly the Air Pollution (Furnaces, Ovens and Chinneys) (Installation and Alternation) Regulations and the Air Pollution Control (Smoke) Regulations.	The Contractor shall operate the LRWE of dur. 60.111.	no production of radioactive liquid effluent.	the LRWF unless otherwise agreed by the Director.
EM&A Ref.	3.10				<b>-</b>
EISA Ref.	1		1	1	

(

What requirements or standards for the measure	to achieve? EP-131/2002 and FEP-063/2003 Condition 2.9	Tender Specification 2.13.3	Pender Specification 2.13.3	Tender Specification 2.13.3	Tender Specification 2.13.3
he	C&O EP. FEI	D&C Ter	C&O Tender 2.13.3	C&O Tender 2.13.3	C&O Tend 2.13.
Location of the measure	Whole site	Whole site	Whole site	Whole site	Whole site
Who to implement the measure?	20	22	20	သ	22
Objectives of the Recommended Measure & Main Concerns to	Use electric powered vehicles	Control surface runoff	Control of effluent	Control of foul water	Compliance with relevant ordinance
Recommended Mitigation Measures	The Contractor shall use electric powered vehicles at the LRWF unless otherwise agreed by the Director.	The Contractor shall not discharge directly or indirectly (by runoff) or cause or permit or suffer to be discharged into any channel, stream-course or sea any effluent or foul or confaminated water or cooling or hot water without the prior consent of the Employer who may require the Contractor to provide, operate and maintain at the Contractor's own expense, within the premises or otherwise, suitable works for the treatment and disposal of such effluent or foul or contaminated or cooling or hot water. The design of such treatment works shall be submitted to the Independent Consultants or, as the case may be, the Employer for approval.	All water and other liquid waste products arising on the Site shall be collected, removed from Site via a suitable and properly designed temporary drainage system and disposed of at a location and in a manner that shall not cause either pollution or nuisance. In addition, the effluent shall comply with the standards stated in the "Technical Memorandum on Standards for Effluent discharged into Drainage and Sewerage Systems, Inland and Costal Waters" for the appropriate Water Control Zone, whether or not the Zone has been declared as one subject to control of discharges.	If any office, site canteen or toilet facilities are erected, foul water effluent shall be directed to a foul sewer or to a sewage treatment facility either directly or indirectly by means of pumping or other means approved by the Independent Consultants or, as the case may be, the Employer.	Ordinactor's attention is drawn to the Building Ordinance, Water Pollution Control Ordinance and the Technical Memorandum "Standards for Effluent Discharged into Drainage and Sewerage Systems, Inland and Costal Waters" issued by EPD.
EM&A Ref.	1	1	1		
EISA Ref.			1	1 1	

EISA Ref.	EM&A Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to	Who to implement the measure?	Location of the measure	When to implement the	What requirements or standards for the measure
1	1	The Contractor shall operate the Facility under the principle of minimising the volume of water or other liquids that shall be used in areas where potential radioactive contamination exists, to minimize the generation of contaminated effluents and discharges.	Measure to minimize contaminated effluents	DD DD	Within Facility	neasure; D&O	to achieve? Tender Specification 2.11.2
ı	4.38	Carry out earth works in dry season as much as possible.	Avoid surface runoff	22	Whole site	Ü	
ı	4.38	Cover areas of exposed earth.	Avoid surface runoff	22	Whole site	Ü	
1	4.38	Install sand traps or catchpits at all drainage discharge points.	Avoid surface runoff	22	Whole site		
ı	4.38	Oil and fuel bunkers to be bunded.	Avoid surface runoff	22	Whole site	) [	
1	4.38	Immediate disposal and correct handling of any chemical spill.	Avoid surface runoff	သ	Whole site	) 0	
ı	4.38	Prevent surface runoff into coastal water through construction of bunds between works area and sea shore.	Avoid surface runoff	သ	Whole site	O	
1	4.38	Provide proper sewage treatment facilities for site workers.	Provision of sewage treatment facilities	20	Whole site	C&O	1
		Good site practices to be undertaken during marine works:					
I	4.38	Unnecessary disturbance to the seabed will be minimized by exerting care when lowering and lifting the tools/equipment into seabed;	Reduce water pollution	22	Whole site	O	
1	4.38	All vessels will be sized such that adequate clearance (i.e. minimum clearance of 0.6 m) is maintained between vessels and the seabed in all tide conditions, to ensure that undue turbidity is not generated by turbulence from vessel movement or propeller wash;	Reduce water pollution	S	Whole site	D&C	
1	4.38	Use of silt curtains surrounding the dredger and the dredged area during dredging;	Reduce water pollution	A CC	Whole site	C	
7	4.38 I	Barges will be used which are fitted with tight fitting seals to their bottom openings to prevent leakage of material;	Reduce water pollution	CC	Whole site	O O	

RICA Dof	EM&A		Objectives of the	Who to		VAVE	,
EISA NEI.	Ref.	Recommended Mitigation Measures	Recommended Measure & Main Concerns to address	<u></u>	Location of the measure	When to implement the measure?	What requirements or standards for the measure to achieve?
1	4.38	Barge loading will be ensured accurately to avoid splashing of loading material to the surrounding water;	Reduce water pollution	22	Whole site	C	
ı	4.38	Adequate freeboard (i.e. minimum of 200mm) will be maintained on barges to ensure that decks are not washed by wave action;	Reduce water pollution	22	Whole site	Ü	
ı	4.38	Grabs (if any) will be closed tightly and that hoist speed will be suitably low; and	Reduce water pollution	၁၁	Whole site	D D	1
ı	4.38	No visible foam, oil, grease, scum, litter or other objectionable matter will be present on the water within the site or dumping grounds.	Reduce water pollution	22	Whole site	U	I
		Waste Management					
		Liquid waste:					
B5.1	9.9	The Contractor will not permit any sewage, waste water or effluent containing sand, cement, silt or any other suspended or dissolved material to flow from the site onto any adjoining land or sea or allow any waste matter or refuse to be deposited anywhere within the site or onto adjoining land and will have all such matter removed from the site.	Measures to control liquid waste	S	Whole site	O	
B5.3	8.9	The Contractor will be responsible for temporary training, diverting or conducting of open streams or drains intercepted by any works and for reinstating these to their original courses on completion of the Works.	Measures to control liquid waste	22	Whole site	U	
B5.4	6.9	The Contractor will be responsible for adequately maintaining any existing site drainage system at all times including removal of solids in sand traps, manholes and stream beds.	Measures to control liquid waste	22	Whole site	U	
B5.5 (	6.10	Any proposed stream course and nullah temporary diversions will be submitted to the Employer for agreement one month prior to such diversion works being commenced. Diversions will be constructed to allow the water flow to discharge	Measures to control liquid waste	22	Whole site	D D	

What requirements or standards for the measure								
When to implement the smeasure?		U		O O	O	O	C)	ı O
Location of the measure		Whole site		Whole site	Whole site	Whole site	Whole site	Whole site
Who to implement the measure?		J)		22	22	))	သ	22
Objectives of the Recommended Measure & Main Concerns to measure?		Measures to control liquid waste		Measures to control solid waste	Measures to control solid waste	Measures to control solid waste	Measures to control solid waste	Measures to control solid waste
Recommended Mitigation Measures	without overflow, erosion or washout. The area through which the temporary diversion runs is to be reinstated to its original condition or as agreed by the Employer after the permanent drainage system has been completed.	The Contractor will furnish, for the Employer's information, particulars of the Contractor's arrangements for ensuring that material from any earthworks does not wash into the drainage system. If at any time such arrangements prove to be ineffective the Contractor will take such additional measures as the Employer will deem necessary and will remove all silt which may have accumulated in the drainage system whether with the Site or not.	Solid waste:	The Contractor will segregate all inert construction waste material suitable for reclamation or land formation and will dispose of such material at such public dumping area(s) as may be specified from time to time by the Director of Civil Engineering Services.	Inert material deemed unsuitable for reclamation or land formation and all non-inert construction waste material deemed unsuitable for reclamation or land formation and all other waste material will be disposed of at a public landfill.	Chemical waste as defined by Schedule 1 of the Waste Regulations (Chemical 1992), will be stored in accordance with approved methods defined in the Regulations and the chemical waste disposed of at the Chemical Waste Treatment Facility located at Tsing Yi.	The Contractor's attention is drawn to the Waste Disposal Ordinance, the Public Health the Municipal Services Ordinance and the Water Pollution Control Ordinance.	Any dredged material will be disposed of at an approved marine dumping ground.
EM&A Ref.		6.11		6.12	6.13	6.14		6.15
EISA Ref.		B5.6		B5.7	B5.8	B5.9	B5.10	B5.11 (

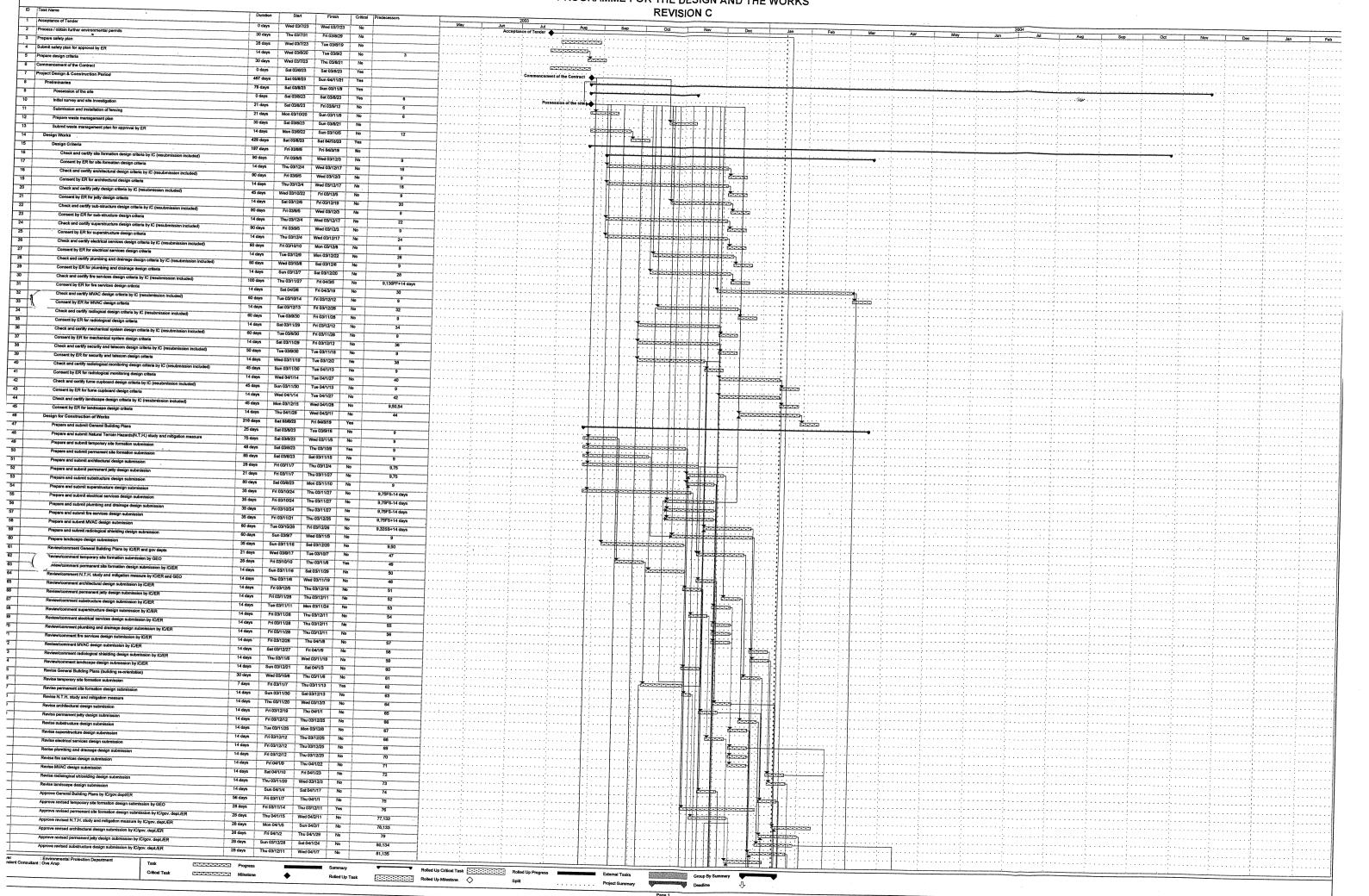
What requirements or standards for the measure	Tender Specification 2.11.3		EP-131/2002 and FEP-063/2003 Condition 2.6	cification	cification	cification	cification
	Tender Sp. 2.11.3		EP-131/2002 and FEP-063/2003 Cc 2.6	Tender Specification 2.13.5	Tender Specification 2.13.5	Tender Specification 2.13.5	Tender Specification 2.13.5
When to implement the measure?	D&O		C	D,C&O	C&O	D D	O
Location of the measure	Within Facility		Whole site	Whole site	Whole site	Whole site	Whole site
Who to implement the measure?	S		SS	D)	22	22	SS
Objectives of the Recommended Measure & Main Concerns to	Measures to control solid waste		Reduce ecological impact	Reduce ecological impact	Reduce ecological impact	Reduce ecological impact	Reduce ecological
Recommended Mitigation Measures	The Contractor will operate the Facility under the principle of minimising the volume of consumables or other materials that will be taken into areas where potential radioactive contamination exists, to minimise the generation of contaminated waste. Volumes of material entering the active areas are to be kept to a minimum, for instance by the removal of packaging from incoming waste, prior to transfer into the active areas and only allowing essential items into such areas.	Ecology	The Contractor shall restore the grassland and low shrub habitat affected by the construction works with the use of native, local grass and shrub species. Shotcrete shall not be used for re-establishment of the cut slope behind the LRWF.	The Contractor shall ensure that work takes place only within agreed site boundaries, that care shall be taken to minimise damage within the area and that materials are not burnt on site. Discharges and disposal of waste to sea will not be permitted and measures shall be taken to minimise the risk of spillage.	No smoking, cooking or any fires shall be allowed on the Siu A Chau Island and all staff shall be made aware of the high fire risk of the construction site. Should a fire accidentally break out due to site work, the contractor shall supply adequate manpower and equipment to fight the fire.	All topsoil and soil on site shall be suitably stored at an agreed location for reuse on site once the project is completed.	Whenever possible, machinery that does not require water shall be utilised. If machinery does require water, then this shall be imported onto site. This is to ensure that water courses are retained in their natural state. No substances shall be discharged into existing water courses on or near the working areas or into the marine environment.
	9. 9		5.7	1		1	
EISA Ref.	1		1		1	1	1

EISA Ref.	EM&A Ref.	Recommended Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to	Who to implement the	Location of	When to implement the	
			address	measure?	the measure	measure?	standards for the measure to achieve?
ı	1	The Contractor shall specify whether underwater blasting and use of explosives is proposed and if so, bubble curtains shall be used to minimise damage to the marine environment. The Contractor shall specify the methods to be used for jetty construction and these shall be agreed, with suitable mittigating measures to minimise damage or nuisance to the	Reduce ecological impact	SS	Whole site	O	Tender Specification 2.13.5
1.	1	Following construction, the Site shall be restored to an agreed plan using plants native to the area and which have been recorded within the Site prior to the construction.	Reduce ecological impact	22	Whole site	Ŋ	Tender Specification 2.13.5
1	1	The Contractor shall design the Facility under the principle of minimising the detrimental impact on the ecology of the terrestrial and marine environment.	Reduce ecological impact	22	Whole site	D&C	Tender Specification 2.11.6
1	1	Prior to carrying out any work on site, a detailed vegetation survey of the habitats and plant species present on the site, their abundance and density shall be undertaken. This is for the purposes of establishing the species to be affected and for the restoration of the site once it is completed.	Reduce ecological impact	SS	Whole site	Prior to construction	Tender Specification 2.11.6
1		The Contractor's attention is drawn to the need to comply with the various Government Ordinances covering the protection of wildlife and countryside.	Reduce ecological impact	22	Whole site	Ü	Tender Specification 2.11.6
	1	Historical and Cultural Heritage					
		During construction works the Contractor shall allow site access to representatives of the Antiquities and Monuments Office, to enable observation of construction in new of the proximity of Siu A Chau Special Site Archaeological Interest (SSAI/NT2). The Contractor shall inform the Antiquities and Monuments Office of the Leisure and Cultural Services Department of HKSARG immediately if antiquities are discovered during construction work.	Measures on antiquities being discovered	22	Within whole site	U	Tender Specification 2.13.6
1		Visual Impact					

EISA Ref. Ref.   EMAA   Recommended Miligation Measures   Recluce visual impact   CC   Within   D.C&O   El    The maximum building height shall not exceed 14mPD.   Reduce visual impact   CC   Within   D.C&O   El    The LRWF shall be an enclosed structure constructed with the visual impact   CC   Within   D.C&O   El    The LRWF shall be constructed with a sloping flat nifed roof   Reduce visual impact   CC   Within   D.C&O   El    The LRWF shall be constructed with a sloping flat nifed roof   Reduce visual impact   CC   Within   D.C&O   El    The LRWF shall be constructed with a sloping flat nifed roof   Reduce visual impact   CC   Within   D.C&O   El    The LRWF shall be constructed with a sloping flat nifed roof   Reduce visual impact   CC   Within   D.C&O   El    The DRAWF shall be constructed with a sloping flat nifed roof   Reduce visual impact   CC   Within   D.C&O   El    The building appearance and architectural features of the fine flat with the surroundings to match with the surroundings to make the construction of the LRWF flat be minimum or on memory with the visual impact   CC   Within   D.C&O   Terminate visual impact   CC   Within   D.C&O   Terminate visual impact   CC   Within   CC   Within   D.C&O   Terminate visual impact   CC   Within   D.C&O   Terminate visual impact   CC   Within   CC   Within   CC   Terminate visual impact   CC   Within   CC   Within   CC   Terminate visual impact   CC   Within   CC   Within   CC   Terminate visual impact   CC   Within   CC   Within   CC   Terminate visual impact   CC   Within   CC   Terminate visual impact   CC   Terminate visual impact   CC   Terminate visua					,			
The LRWF shall be an enclosed structure constructed with rectuee visual impact  The LRWF shall be an enclosed structure constructed with a sloping flat tiled roof farea about filted with waterpoofing materials. The column and the external wall of the LRWF shall be constructed on the costant side of the Facility.  The bridging area of the LRWF shall be in subdued colour. Reduce visual impact  The bridging appearance and architectural features of the final financials with the surroundings to the LRWF the Contractor shall receive visual impact  The bridging appearance and architectural features of the final flat manning with the surroundings to the LRWF the Contractor shall receive visual impact  The bridging appearance and architectural features of the final flat manning with the surroundings to fine construction are as limited to the minimum of the construction are as limited to the minimum of the construction programm as a means of reduce visual impact  Whole site  Within  C Within  Dic&O  Within  Dic&O  The external surfaces of the LRWF the Contractor shall require visual impact  C Within  Whole site  C Within  Dic&O  The bridging appearance and architectural features of the final requirement of the LRWF the Contractor shall require visual impact  C Within  C Within  C Within  C C C C C C C C C C C C C C C C C C C	EISA Ref		Recommended Mitigation Measures	Objectives of the Recommended Measure & Main Concerns to	Who to implement the measure?	Location of the measure	When to implement the	What requirements or standards for the measure
The LRWF shall be an enclosed structure constructed with reinforced concrete or structural steel frame of area about reinforced concrete or structural steel frame of area about reinforced concrete or structural steel frame of area about at the by 24m and with an elevation of 6.5m.  The LRWF shall be constructed with a sloping flat tiled roof fitted with waterpool with a sloping flat tiled roof fitted with waterpool materials. The column and the external wall of the LRWF shall be constructed on the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure into the natural solone cradding to help integrate the structure of the construction are is finited to the minimum impact.  The building appearance and architectural features of the final commensurate with the construction programme as a means of reducing the levels of potential visual impact.  Duming the construction of the LRWF shall barrondon continued or commensurate with the construction programme as a means of reducing the levels of potential visual impact.	ı	ı	The maximum building height shall not exceed 14mpD	address	casan c.		measure?	to achieve?
The LRWF shall be an enclosed structure constructed with reinforced convertee or structural steel frame of area about reinforced convertee or structural steel frame of area about reinforced convertee or structural steel frame of area about reinforced convertee or structural steel frame of a stoping flat tiled roof f. 5m.  The LRWF shall be constructed with a sloping flat tiled roof fitted with waterproofing materials. The column and the store cridding to help integrate the structure into the nature setting.  The hardstanding area of the LRWF shall be constructed on the costal side of the Facility.  The external surfaces of the LRWF shall be in subdued colour Reduce visual impact CM Within Di,C&O II to match with the surroundings before operation.  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to of the commensurate with the construction programme as a means of reducing the levels of potential visual impact.  During the construction of the LRWF the Contractor shall commensurate with the construction programme as a means of reducing the levels of potential visual impact.  Debesign: C=Construction of poperation: CC=Construction of contractor.				Neduce Visual Impact	ည	Within whole site	D,C&O	EP-131/2002 and FEP-063/2003 Condition 2.10
reinforced concrete or structural steel frame of area about 44m by 24m and with an elevation of 6,5m.  - The LRWF shall be constructed with a sloping flat tiled roof fluted with waterproofing materials. The column and the external wall of the LRWF shall be wapped with natural solutions of the LRWF shall be constructed on the construction of the LRWF shall be constructed on the construction of the LRWF shall be constructed on the construction of the LRWF shall be in subdued colour.  The hardstanding area of the LRWF shall be in subdued colour. Reduce visual impact  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to match with the construction of the LRWF the Contractor shall commensurate with the construction programme as a means  D=Design. C=Construction; O=Operation; CC=Construction Contractor	1	ı	The LRWF shall be an enclosed structure constructed with	-	C			
The LRWF shall be constructed with a sloping flat tiled roof filted with waterproofing materials. The column and the external wall of the LRWF shall be wrapped with natural stone cradding to help integrate the structure into the nature setting.  The hardstanding area of the LRWF shall be constructed on the costal side of the Facility.  The waternal surfaces of the LRWF shall be in subdued colour to match with the surroundings before operation.  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to maint wise visual impact.  During the construction of the LRWF the Contractor shall ensure that the construction programme as a means of reducing the levels of potential visual impact.  Debesign: C=Construction: O=Operation: CC=Construction Contractor			reinforced concrete or structural steel frame of area about 44m by 24m and with an elevation of 6.5m.	Reduce visual impact	3	Within whole site	D,C&O	EP-131/2002 and FEP-063/2003 Condition
Feduce visual impact a visual impact a visual impact a visual impact because visual impact a visual visu	1	1	The LRWF shall be constructed with a sloning flat tiled roof					7.11
The external surfaces of the LRWF shall be constructed on the costal side of the Pacility.  The external surfaces of the LRWF shall be in subdued colour to match with the surroundings before operation.  The building appearance and architectural features of the final minimise visual impact.  During the construction of the LRWF the Contractor shall results of reducing the levels of potential visual impact.  Debesign: C=Construction: O=Operation.  The building area of the LRWF shall be in subdued colour actions are a signified to the minimum of reduce visual impact and architectural features of the final minimum of reduce visual impact.  During the construction area is limited to the minimum of reducing the levels of potential visual impact.  D=Design: C=Construction: O=Operation; CC=Construction Contractor.			fitted with waterproofing materials. The column and the external wall of the LRWF shall be wrapped with natural stone cradding to help integrate the structure into the nature setting.	Reduce visual impact	SS	Within whole site	D,C&O	EP-131/2002 and FEP-063/2003 Condition 2.12
the costal side of the Facility.  The external surfaces of the LRWF shall be in subdued colour to match with the surroundings before operation.  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to minimise visual impact.  During the construction area is limited to the minimum commensurate with the construction programme as a means of reducing the levels of potential visual impact.  D=Design; C=Construction; O=Operation; CC=Construction Contractor	ı	1	The hardstanding area of the LRWF shall be constructed and					
The external surfaces of the LRWF shall be in subdued colour to match with the surroundings before operation.  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to minimise visual impact.  During the construction of the LRWF the Contractor shall ensure that the construction programme as a means of reduce visual impact.  D=Design: C=Construction; O=Operation; CC=Construction  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to minimise visual impact.  Seduce visual impact  CC Within D,C&O  Within CC  Within D,C&O  Within CC  Within D,C&O  Within CC  Within			the costal side of the Facility.	Reduce visual impact	))	Within whole site	D,C&O	EP-131/2002 and FEP-063/2003 Condition
to match with the surroundings before operation.  The building appearance and architectural features of the final design of the LRWF shall harmonise with the surroundings to minimise visual impact.  During the construction of the LRWF the Contractor shall ensure that the construction area is limited to the minimum commensurate with the construction programme as a means of reducing the levels of potential visual impact.  D=Design; C=Construction; O=Operation; CC=Construction Contractor			The external curfaces of the 1 page of the 1					2.13
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Reduce visual impact CC Within C whole site			design of the LRWF shall harmonise with the surroundings to minimise visual impact.	Reduce visual impact		Within whole site		Tender Specification 2.11.5
Reduce visual impact CC Within C whole site			During the construction of the I RWR the Contraction and					
* D=Design; C=Construction; O=Operation; CC=Construction Contractor			ensure that the construction area is limited to the minimum commensurate with the construction programme as a means of reducing the levels of potential visual impact.	Reduce visual impact		Within whole site		Tender Specification 2.13.4
	*	=Design; (	=Construction; O=Operation; CC=Construction Contractor					

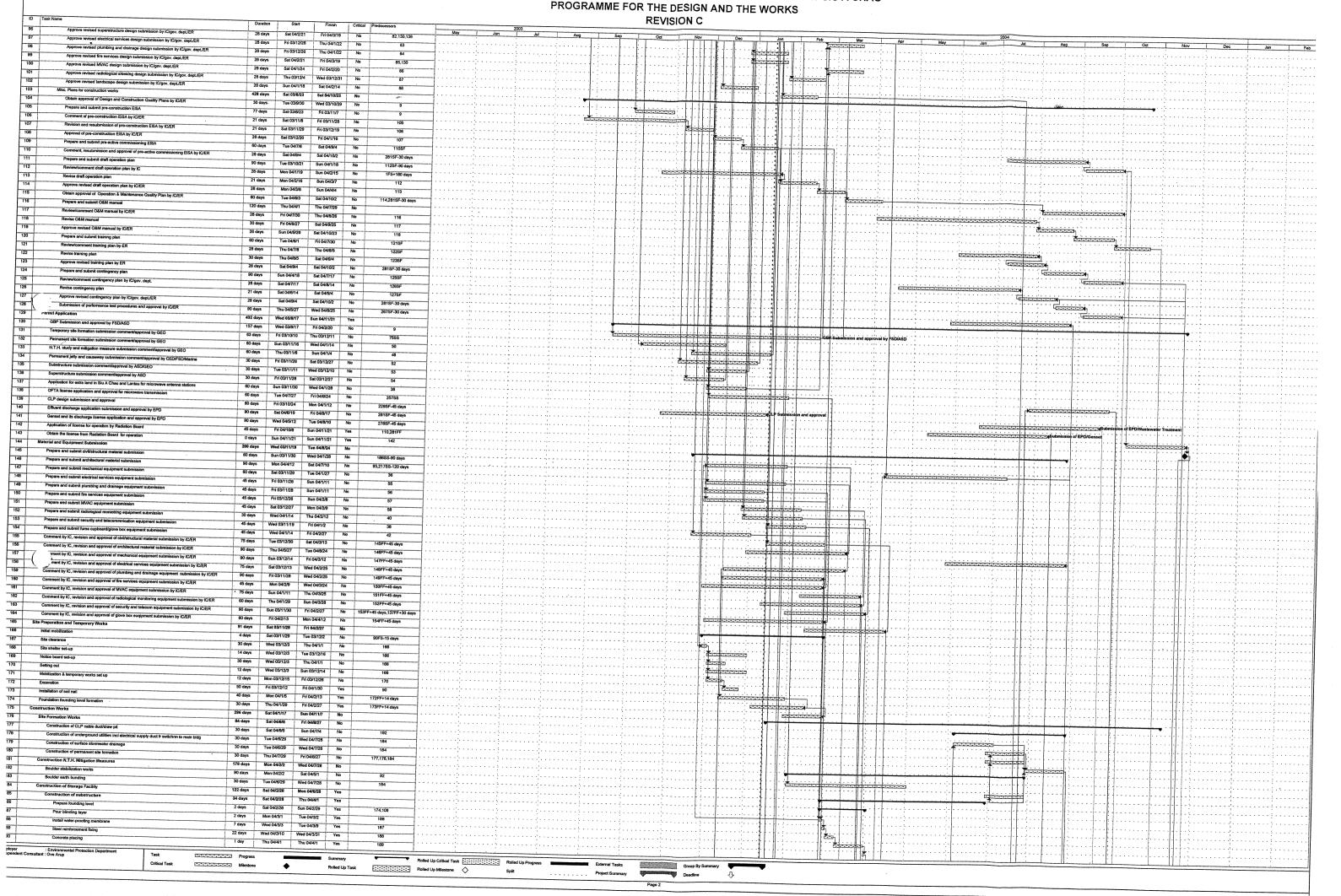
APPENDIX B TENTATIVE WORKS PROGRAMME

# ATAL BELGOPROCESS JOINT VENTURE EP/SP/40/02 LOW-LEVEL RADIOACTIVE WASTE STORAGE FACILITY AT SIU A CHAU PROGRAMME FOR THE DESIGN AND THE WORKS

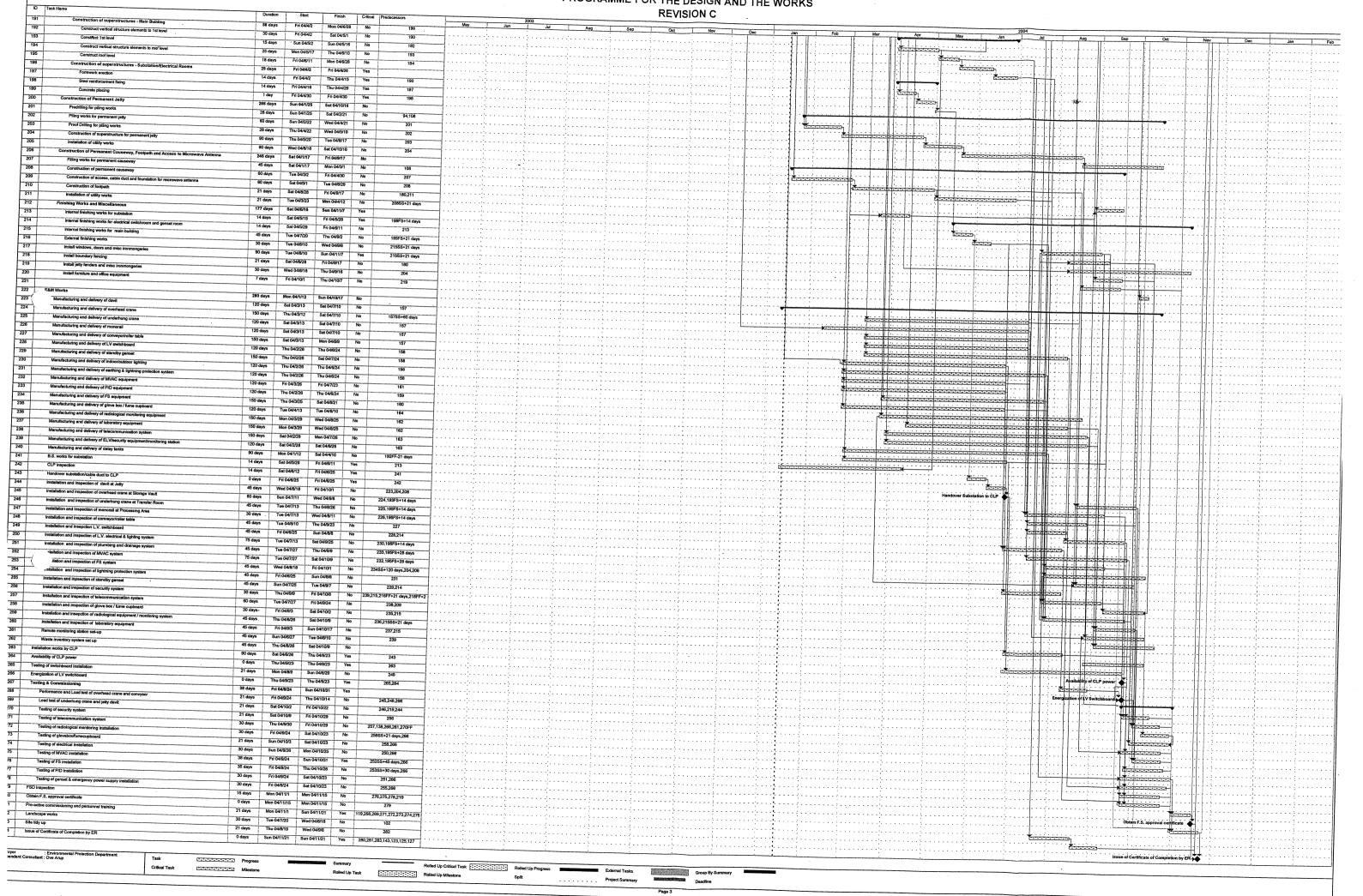


## ATAL BELGOPROCESS JOINT VENTURE PROGRAMME FOR THE DESIGN AND THE WORKS

EP/SP/40/02 LOW-LEVEL RADIOACTIVE WASTE STORAGE FACILITY AT SIU A CHAU **REVISION C** 



# ATAL BELGOPROCESS JOINT VENTURE EP/SP/40/02 LOW-LEVEL RADIOACTIVE WASTE STORAGE FACILITY AT SIU A CHAU PROGRAMME FOR THE DESIGN AND THE WORKS



APPENDIX C SAMPLE OF WATER QUALITY FIELD DATA SHEET

## Contract No. EP/SP/40/02 LRWF at Siu A Chau



Water Quality Monitoring Data Record Sheet

						Mid-Flood / Mid-El	bb			
Weather:	Sunny / F	Fine / Cloudy / I	Rainy	Vessel N	4o:		Sea Condit	ion: <u>Calm / Mo</u>	derate / Rough	
	Equip	ment		Model		Equ	ipment No.		Rem	arks
YSI 6820	Multi-Param	eter	68	20	□ w	′-03-01				
YSI 650-N	MDS Handhe	ld Display	65	0-MDS	□w	7-04-01 W-04-02				
					_					<del></del>
Location	Login I.D.	Sampling Start Time	Water Depth (m)		npling epth	Appearance of Water	Obso	ervation	Coordinate	Remark
	WISE			S	1.0	Clear   Turbid	Dredging	Plume	22°10.7138	
WI	WIME			М		Clear Turbid	Dumping Reclamation	Scum Rubbish	113°55.1044 or	
	WIBE			В		Clear Turbid	Dead fishes	not observed	OI	
	W2SE			S	1.0	Clear Turbid	Dredging	Plume	22°10.6377	
W2	W2ME			М		Clear Turbid	Dumping Reclamation	Scum Rubbish	113°55.1073 or	
	W2BE			В		Clear 🔲 Turbid	Dead fishes	not observed		
W3	W3SE			S	1.0	Clear   Turbid	Dredging	Plume	22°10.6723	
***	W3ME W3BE			M		Clear Turbid	Dumping Reclamation	Seum Rubbish	or	•
	WORL		-	В	-	Clear 🔲 🔲 Turbid	Dead fishes	not observed	-	
WS				М		Clear 🔲 🗍 Turbid	Dredging Dumping Reclamation Dead fishes	Plume Scum Rubbish not observed	22°10.7592 113°55.0605 or	
Any dum	ping barge	h is 3m-6m, e nearby ?	Y/N		If yes		nap on reverse	side and indica	below water surface	or not.
		ration of the			Y/N	If yes,			vs the number on the narks on appearance.	*
Any red ti	ide?	Υ /	'N		If yes,	, please mark on map				
Any fish l	killed ?	Y	/N			please mark on map				
Remark :										
				•						
								. 10		
Conducted	by:					Cl. 1				
						Checked by :				
D	ate:					Dota				

Project No. HW3025

APPENDIX D SAMPLE OF COMPLAINT LOG

ATAL-Belgoprocess Joint Venture

Contract No.EP/SP/40/02 Low-Level Radioactive Waste Storage Facility at Siu A Chau Environmental Monitoring and Audit Manual (Non-radiological)

Appendix D - Sample Complaint Log

Complainant	Complainan	t,			
Date/Location Date of Details of Complaint Contact		Details of Con	nplaint	Investigation/ Mitigation Action	File Closed
			-		
					_

Filled by Environmental Team Leader:\_\_\_\_\_

D - 1

Date:\_

APPENDIX E SAMPLE OF THE INTERIM NOTE: CATIONS OF EXCEPDANCES

Contract No.EP/SP/40/02

Low-Level Radioactive Waste Storage Facility at Siu A Chau

Environmental Monitoring and Audit Manual Appendix E - Sample of Template for Interim Notifications of Environmental Quality Limits Exceedances (Water Quality Monitoring)

Monitoring Date

Report No.

Level Exceeded							
Target Level (mg/l)							
Action Level (mg/l)							
Target Level (mg/l)				-			
Measured value				ion			
Monitoring Parameter(s)		lan		ations for mitigat	the mitigation		
Tide		action p	tion plan	ommend	plement		
Station No. Time of Measurement	Remarks (a) cause of exceedances	(b) action required under the action plan	(c) action taken under the action plan	(d) ET's conclusions and recommendations for mitigation	(e) Contractor's actions to implement the mitigation	(f) Contractor's comment	
Statio	Remarks (a) cause of	(b) act	(c) act	(d) ET	(e) Cor	(f) Con	

H-1

Contractor Signature & Date:\_

ET Signature & Date:\_