Environmental Monitoring Report

Semestral Report for January – June 2015

UZB: Talimarjan Power Project

Prepared by State Joint Stock Company UzbekEnergo for the Republic of Uzbekistan and the Asian Development Bank.

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ABBREVIATIONS

ADB	Asian Development Bank
CGSAP	Community and Gender Strategy Action Plan
CS-MM	Corporate Solutions and Mott MacDonald Team
CCGT	Combined Cycle Gas Turbine
CSCL	Corporate Solutions Consulting Ltd
DMF	Design and Monitoring Framework
DRM	Design Review Meeting
EA	Executing Agency
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPC	Engineering Procurement Construction
GoU	Government of Uzbekistan
GTG	Gas Turbine Generator
HDEC	Consortium of Hyundai and Daewoo
H&S	Health & Safety
HSE	Health, Safety, and Environment
HRSG	Heat Recovery Steam Generator
HVAC	Heating Ventilation and Air Conditioning
IA	Implementing Agency
IC	Implementation Consultant
IAS	International Accounting Standards
IFI	International Financial Institution
ISO	International Organisation for Standardisation
JICA	Japan International Cooperation Agency
MFERIT	Ministry for Economic Relations and International Trade
MoM	Minutes of Meeting
MPR	Monthly Progress Report
PAM	Project Administration Manual
PFS	Project Financial Statements
PMU	Project Implementation Unit
PPE	Personal Protective Equipment
PPMS	Project Performance Monitoring System
STG	Steam Turbine Generator
TPP	Talimarjan Power Project
UE	SJSC UzbekeEnergo
UFRD	Fund for Reconstruction and Development of the Republic of Uzbekistan
UZS	Uzbekistan Som (currency unit)
VAT	Value Added Tax
WA	Withdrawal Application
ZEP	Zone Environmentally Protected -Environmental Effects/Impact Statement

Part I Introduction

The Government of Uzbekistan has received a loan from the ADB to part finance the construction of the Talimarjan Clean Power Project (the project) - a combined cycle gas generation plant. The project is located in Kashkadarya Province of Uzbekistan, 440 km south west of Tashkent. The site is an existing power plant, which currently generates 800 megawatts (MW). The project will install two combined cycle gas turbine (CCGT) units of about 450 MW each at the site.

Construction of CCGT units is planned for the expansion of TPP to improve the overall efficiency and environmental performance of Uzbekenergo's generating activities across the country. The most advanced and efficient CCGT units available in the 370-450 MW range are being considered for this project.

Based on ADB's safeguards policy statement (SPS), the Project is classified as follows: (i) environment (category A) – environmental impact assessment (EIA), (ii) involuntary resettlement (category C) – no actions, and (iii) indigenous peoples (category C) – no actions. Therefore, an environmental clearance from ADB was obtained in December 2009.

According to the Decree of the Cabinet of Ministry of Republic of Uzbekistan № 491 "On government ecological expertise", the Project is classified as a class 1 Project under the Uzbekistan Environmental Legislation. The environmental clearance was obtained from the Nature Protection Committee (NPC) on 5 October 2009. Moreover, in order to comply with environmental legislations of the Republic of Uzbekistan, a new Conclusion of Ecological Expertise № 18/768 was received on 13 August 2013 from the State Nature Protection Committee for the project.

The State Committee for Nature Protection, Kashkadaria regional committee for nature protection, was given the responsibility to oversee compliance to the local environmental legislations on the protection of nature during the project implementation.

The Environmental Impact Assessment (EIA) has been prepared to meet the requirements of the Uzbekistan Environmental Legislation as well as the ADB's environment policy requirements. The EIA was published on 15 December 2009. Two rounds of public consultations were held prior to project appraisal. The environmental sensitivity of the Project site and its surrounding areas is low. Town of Nuristan is the only community close to the plant where the employees of Talimarjan TPP live. The nearest settlements are over 5 km away. The Project's key environmental issues are **air quality** and **emissions, noise impacts** on the Nuristan settlement and **waste management**.

The objective of this report is to report progress of implementing Site Specific Environmental Management Plan and Environmental Monitoring Plan (EMP), as stated in the Environmental Impact Assessment report. This bi-annual environmental monitoring report covers the period January to June 2015. The report is prepared jointly by the Project Implementation Unit (PMU) and the project implementation consultant, Corporate Solutions and Mott MacDonald (CS-MM).

1.1. Construction activities and project progress during the previous 6 months

In this review period, the Project is at an advance stage of construction. Below is a summary of construction activities and project progress during the reporting period:

- The two HRSG steel structure and casings have been erected. HRSG of the Unit 2 modules was installed. HP, IP and LP Steam Drums, as well as Blow Down Tank of HRSG-2 have been installed. Inlet and Outlet Casings were being installed as of the end of June 2015. Erection of the first and second cylinders of the main stack of

HRSG-2, and the first cylinder of HRSG-3, are completed. For HRSG-3, the installation of access stairs and platforms and casing welding are in progress.

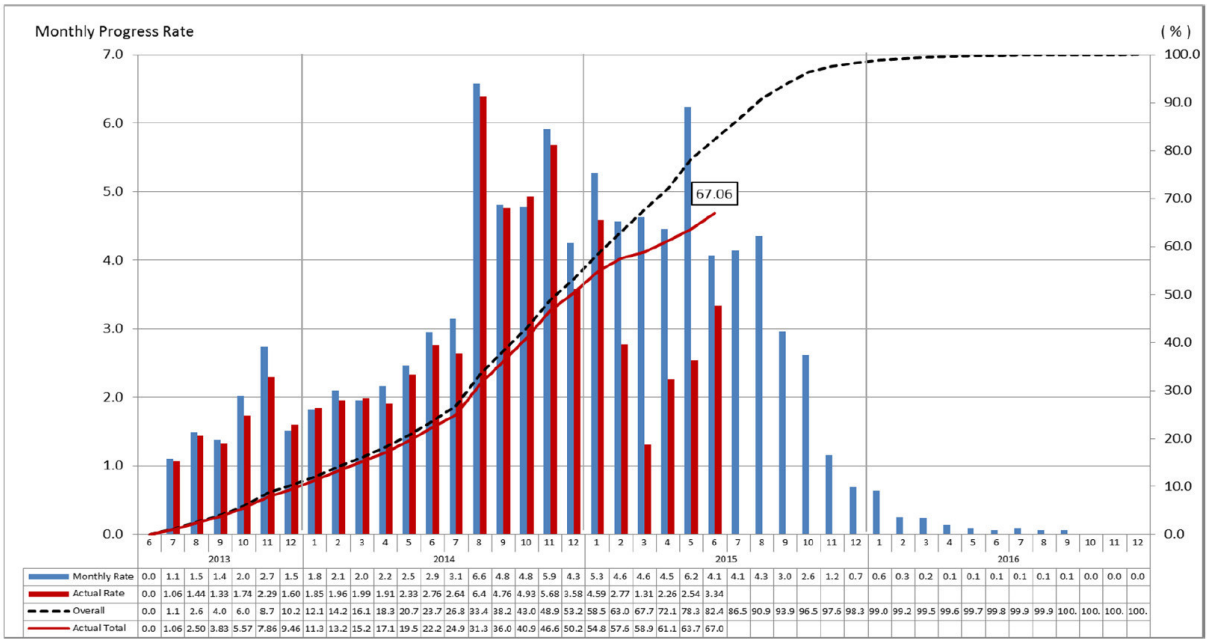
- The foundations of GT-2/GTG-2 and GT-3/GTG-3 are fully completed and the preparation works for installation of equipment and steel plate are on-going. GT auxiliaries' foundation is in progress, which should have been completed in April 2015. Underground oil drain piping installation, coating and PE wrapping are also on-going.
- The foundations of HRSG-2 and HRSG-3 areas are completed with the exception of the pipe rack foundation No.F-15 of HRSG-2. Grouting of the main structure is completed.
- In ST2-STG2 and ST3-STG3 areas, steam turbine and generator's main foundations are completed as well as the Sole plate installation on ST2-STG2. STG Auxiliary foundation works are on-going for both units. Backfilling of foundation area (ground floor) and concreting of ground floor level are in progress. These should have been completed in April 2015.
- For the Unit-2 and Unit-3 MV Switch Gear Rooms and Step-up Transformers Area, all the major civil works have been completed except for the fire wall of the auxiliary transformer. Rebar and form works are in progress.
- In 500 kV Switchyard, all of the major (gantry) foundations have been completed. Backfilling, soil compaction and foundation slab for other equipment, as well as the rebar formwork and concreting of other foundations are in progress. These should have been completed in Feb 2015.
- The main turbine building foundation is completed while the rebar work and concreting of ground floor are on-going. These should have been completed in Jan 2015. Backfilling is in progress but the progress is very slow. Few columns (4) and beams (7) of the main building structure have arrived and three (3) columns including some beams have been installed.
- Ground floor slab work of Administration building is completed but no progress in the building's structure has been observed due to a lack of steel structures. The installation of cable tray, cable ladder and cable support structure at basement level is on-going.
- Circulating water piping system between condenser and the existing channel works are on-going, but progress is slow. Pouring concrete of the base and supporting wall is completed. Backfilling is not yet completed and the excavation work of some portion for circulating water-piping system between condenser and the existing channel has not yet started. This was due for completion in June 2014.
- For the Cable Ducts and Pits, PVC pipe for cable installation and rebar, and the concreting of cable duct is on-going. Embedded materials installation, reinforcement bar and formwork of drainage of cable duct are also on-going and should be completed in July 2014.
- For the standby transformer, the base slab is completed and the rebar, formwork and concreting of pedestal foundation are in progress.
- Emergency Diesel Generator and DM transfer pump Foundation works are in progress. The backfilling and compaction of the soil is also completed and the excavation of the foundation is on-going.
- In the Cooling Tower and Intake Area, rebar work, form work and embedded materials installation of canal and perimeter drainage for cooling tower basin are in

progress. Installation of cooling tower material (FRP/PVC) has started and the backfilling around the canal is on-going.

- In the Fuel Gas Station Area, backfilling is completed and the fuel gas treatment and compressor station floor concreting is in progress. Pipe bridge pedestal foundation and cable gallery are completed.
- Main and Electrical Control Building's foundations are completed, but progress is slow.

The latest overall progress S-curve, extracted from HDEC's Monthly Progress Report, is shown in Figure 1.

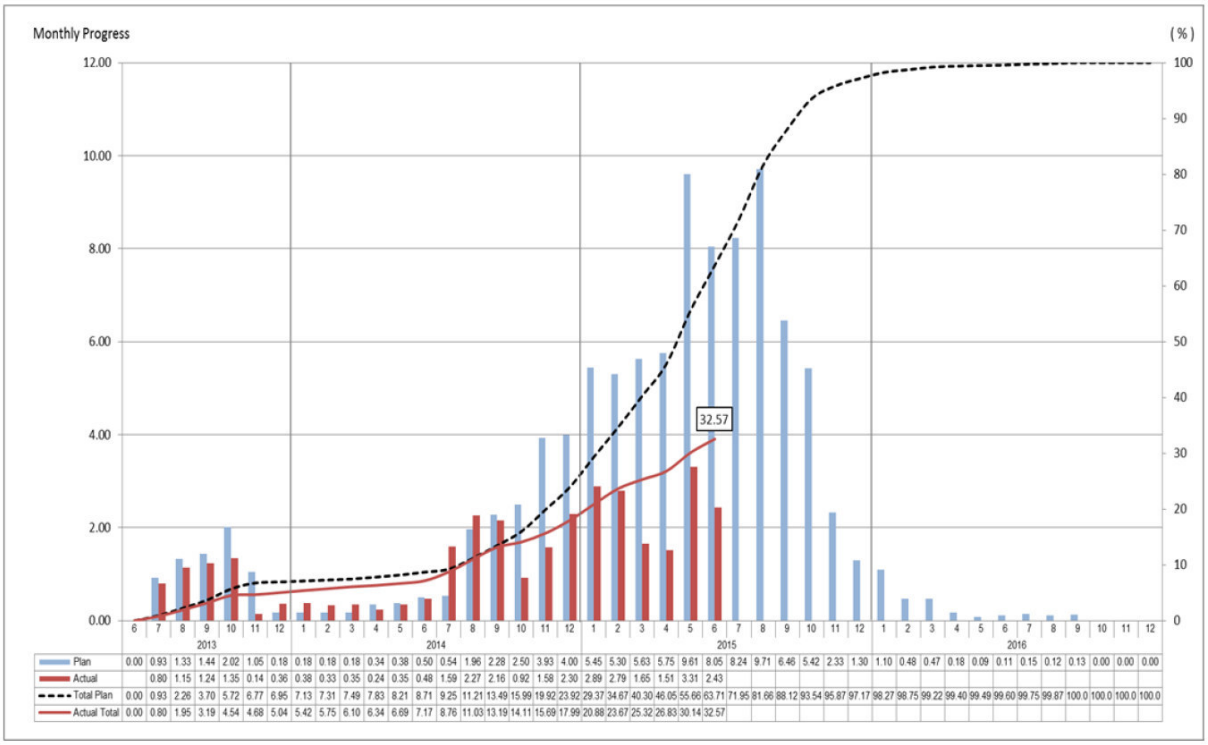
Figure 1: Overall Project S-Curve as of June 2015



* Attached S-Curve was amended based on the Detail Project Schedule submitted on 20th Jun. 2014. (Log No : LET-HDEC-PMU-0229)
* Прилагаемая S-кривая была изменена в соответствии с Рабочим графиком реализации Проекта, представленного 20 июня 2014 г. (№LET-HDEC-PMU-0229)

The overall progress is 67.7% at as at the end of June 2015 which is significantly behind the planned schedule (82.4%).

Figure 2: Construction S-Curve as of June 2015



The overall construction S-curve, extracted from the HDEC's Monthly Progress Report for June 2015, is shown in Figure, above.

Actual construction by the end of June 2015 is 32.57%. Compared to the planned 63.71%, the difference is 31.14%. It was 14.98% by end of March. This shows that the delay in completion of the project is significantly increasing in each quarter. In 2015, the average monthly construction progress is 2.48%, whereas the planned average is 6.63%.

The construction of the plant is now running late by an estimated 22-24 weeks based on the examination of schedules and CS-MM's site visits. It was 15-17 weeks at the end of March 2015. This is CS-MM's estimate of the overall additional time needed to complete the project based on the assessed delays as at the end of June 2015. CS-MM proposed a list of remedial actions to avoid further delay and catch up existing delays to the extent possible. HDEC has not, however, proposed any remedial actions or submit a contingency plan describing how the lost time will be recovered. This proposal has been requested on a number of occasions over the first quarter as well as the last year.

1.2. Change in project organization and environmental management team

The organizational structure of the PMU slightly changed in this reporting period. It was decided by Uzbekenergo that starting from June 2015 Head of Environmental Department of Uzbekenergo, Ms. Magfrat Muminova, will oversee work of environmental expert of both the PMU and TPP. The environmental expert of the PMU, Ms. Yuliya Yakubova resigned from the project in February 2015, and thereafter all the role of environmental expert was handed over to Ms.Diana Rakhimova (Social and Gender expert of the PMU) in addition to her own responsibilities.

The CS-MM's and the HDEC's Organizational Structure has remained the same during this reporting period.

The previous international Environmental and Social expert left the project in October 2014 to pursue voluntary work for a period of 6 months. The new international expert, Mr Asim

Acikel, was proposed in November 2014 and mobilised on 8 March 2015 and is based at Talimarjan. The Additional Agreement 5 was registered in May 2015.

1.3. Relationship with contractor, owner, lender

The project is implemented by the Executing Agency (EA), Uzbekenergo. It is under the control of a Project Management Unit (PMU), headed by a Project Director appointed by the EA. The PMU works closely with the corresponding departments within the existing TPP organization to achieve the necessary coordination and integration with the ongoing operation of TPP Unit 1.

HDEC was appointed in March 2013 as the EPC Contactor responsible for the design, supply, delivery, erection, testing, and commissioning of the two CCGT units. HDEC conducts environmental monitoring at site and prepares and submits monthly environmental monitoring report to the PMU.

The Consultant's contract was signed on 26 November 2011. The role of the Consultant is to help PMU assure that the plant is constructed to the standard specified in the EPC Contract, completed on schedule, and costs are monitored and controlled. The Consultant's role covers design audit, monitoring of the Contractor's works, issuance of necessary progress reports and payment certificates, and the provision of general project management. Audit of compliance with the site-based Environmental Management Plan and site monitoring are carried out on a monthly basis by the Consultant and monthly Environmental Reports are prepared and submitted to the PMU. Consultant's also reviews HDEC's monthly environmental report to identify any non-compliance issues and to evaluate environmental monitoring progress and prepare written comments to allow the PMU to control compliance with the site based Environmental Management Plan, and to be aware of any issues affecting the project.

Initially Monthly Progress Review Meetings were foreseen between the PMU, HDEC, and CS-MM. The PMU decided to cancel the Monthly meetings but instead meet on every Friday since June 2015. The progress of environmental issues was not on the agenda of the monthly progress meetings, but on the recommendation of the CS-MM, it will be on the agenda of the future progress meetings.

Environmental and Social expert of CS-MM and the environmental experts of TPP and HDEC meet regularly to discuss and coordinate environmental concerns and agree remedial actions.

The PMU reviews and analyzes monthly environmental reports both from the HDEC and the CS-MM. To ensure proper and timely implementation of the EMP and adherence to the agreed environmental covenants, the ADB requires Uzbekenergo to submit bi-annual reports on the implementation of the EMP, and this requirement is reflected in the loan agreement. The PMU submits the bi-annual environmental monitoring reports to the ADB. The PMU also sends the bi-annual Environmental monitoring reports to the Kashkadarya Regional Committee of the Nature Protection for reference as well.

There is some reluctance by HDEC to provide access to the environmental documents as well as to copies of requested environmental documents for verification. This makes CS-MM works on environmental issues difficult.

Part II Environmental Monitoring

In the absence of normative documents and local permits, the environmental monitoring at site is not in line with the local statuary monitoring requirements.

2.1 Noise

The EIA requires monitoring of noise during the construction stage. During construction of the CCGT units, there are short-term and reversible impacts on local residents caused by construction noise. Sources of noise include increased traffic and construction equipment. Construction works involving particularly noisy equipment or activities are, however, contained to daylight hours. Equipment are properly maintained and operated to minimize noise and its impact on the residents of Nuriston. A survey of the site and surrounding areas were undertaken during construction at weekly intervals, with additional checks during unusual high noise activities to check for excessive noise levels.

The noise monitoring results at the Nuriston community indicate that the existing noise emissions at and near the site are lower than limits set by Uzbekistan legislation but are higher than limits set by the World Bank. The noise monitoring results are in line with the baseline conditions. The noise measurements were carried out by the HDEC Environmental expert with noise meters of the HDEC. The main concern related to noise data is about its reliability due to absence of licenses/certificate for both the noise meter and for the user.

The noise monitoring data extracted from HDEC monthly environmental report is given at Annex 1.

2.2 Water quality

The area surrounding the TPP has no natural surface water features and the manmade structures, such as the irrigation canal, have low environmental values. The potential risks to surface water features from the construction of the new turbines are therefore low, which is why the EIA does not require monitoring of surface water quality during the construction phase.

As groundwater exits over than 16 m deeper, therefore, the EIA does not require monitoring of ground water quality during construction phase as well.

2.3 Air quality

The EIA does not require monitoring of air emissions, but the EIA requires monitoring of dust levels in the surrounding areas to adjust or increase the frequency or intensity of control measures accordingly during construction phase. Although, dust level monitoring was required by the EIA, the Contractor was not carrying out such monitoring since the beginning of the project. The Contractor was requested to take necessary measures and actions to monitor dust levels in the surrounding areas during rest of construction phase.

2.4 Flora and fauna monitoring

Despite the region generally being a source of habitat to a significant number of native and introduced species, including some of conservation significance, the CCGT and TPP sites are highly modified, having been cleared of vegetation, and having a habitat unlikely to support any flora or fauna species of environmental significance. No impacts that would

adversely affect these areas are likely to result from the construction of the new CCGT units, therefore, the EIA does not requires flora and fauna monitoring during construction phase.

2.5 Others

Record of water consumption: Both the EIA and local environmental regulations require the monitoring of water consumption. But, the Contractor was not monitoring actual water usage since the beginning of the project. The monthly water data for non-potable and potable water is 8412 and 1971 m3 respectively extracted from HDEC monthly environmental report, provided at Annex 1 of this report indicates total monthly allocated water quantity by the TPP, but it is not the actual usage data consumed at the construction site. With advice and clear guidance of the CS-MM, the Contractor did submit applications to the local environmental authorities to obtain normative documents for water usage monitoring (ПОД-11) and started to install additional water meters at the site. After installing of water meters and obtaining normative document (ПОД-11) for monitoring water usage, it is expected that the Contractor will monitor water usage in line with the local environmental regulations and keep records for the rest of the construction period.

Waste: The EIA requires that prior to the start of construction, the HDEC develops an inventory of waste fractions expected to be generated during construction for the approval of disposal routes and sites by the local authorities, but the inventory of waste fractions was not prepared by the HDEC and the issue is still pending since the beginning of the project. Moreover, both the EIA and local environmental regulations require keeping record of waste generated during construction phase. But, the Contractor was not keeping record of waste generated, domestic, hazardous etc., in line with the local environmental regulations since the beginning of the project. Total disposable waste quantity is 16.8 tons as per HDEC monthly report which is indicated at Annex 1of this report. The disposed waste data does not reflect the type of waste, for example quantity of domestic wastes, hazardous wastes and construction wastes generated etc., are not indicated in HDEC waste data. With advice and clear guidance of the CS-MM, the Contractor submitted applications to the local environmental authorities to obtain normative documents. After obtaining normative documents, it is expected that the Contractor will monitor waste generated in line with the local environmental regulations and keep record of it during rest of the construction period. Waste management on site still needs to be improved with more accessible and appropriate waste bins and a site based waste management plan for various waste types and waste classifications, and proper disposal according to the local environmental regulations.

Wastewater: Both the EIA and local environmental regulations require monitoring of wastewater discharges. The HDEC monitors only domestic wastewater quality quarterly, but the quantity of domestic wastewater is not monitored. The domestic wastewater quality data as per HDEC monthly report which is indicated at Annex 1of this report is in line with local domestic wastewater discharge limits. The main concern is the reliability of domestic wastewater quality data due to the absence of accredited certificates of the laboratory for wastewater analysis. Another concern is that wastewater monitoring is not in line with the local environmental regulations. With advice and clear guidance of the CS-MM, the Contractor submitted applications to the local environmental authorities to obtain normative documents for wastewater discharge monitoring (ПОД-13). After obtaining the normative document (ПОД-13) for monitoring wastewater discharges, it is expected that the Contractor will monitor wastewater discharges in line with the local environmental requirements and keep records during rest of the construction period.

Accident and incidents: The EIA requires monitoring and keeping reports of environmental accident and incidents, and during this reporting period there were no environmental incidents.

Overall, project construction stage lacks reliable qualitative and quantitative environmental monitoring data for making proper analysis of environmental assessment. Environmental records needs to be improved. This has been emphasized by CS-MM in monthly environmental reports. Without qualitative and quantitative data it is difficult to do any environmental assessment aside from visual inspections. Photographs are given at Annex 2 in order to illustrate site conditions.

After obtaining normative documents and local permits, it is expected that reliable qualitative and quantitative environmental monitoring data will be available for the rest of the construction period for effective environmental assessment.

Part III Environmental Management

3.1 Environmental management system (EMS), site specific environmental management plan, and work plan

The HDEC established an operational system for managing environmental impacts and carries out the monitoring and mitigation measures set out in the Site based Environmental Management Plan. The HDEC submits to the PMU monthly environmental reports on the implementation of such measures.

The HDEC prepared site specific environmental management plan (EMP) at the beginning of the project. The site specific EMP was revised by the Contractor and was reviewed and approved by the PMU on 6 August 2014. Main concern about the site specific EMP is that local statutory environmental management and monitoring requirements were not reflected in the plan due to the absence of permits and normative documents. A review of the site-based EMP, to facilitate reporting site conditions and status, has not yet been performed by HDEC. The purpose of the review should be to ensure continued improvement of environmental conditions (ISO 14001). The review was pending as of the end of July 2015 despite the agreement to conduct bi-annual reviews. In June 2015, the ADB mission also requested the revision of the site based EMP and environmental monitoring plan. It is expected that the site-based EMP will be revised by HDEC to reflect the statutory environmental management and monitoring requirements and the current situation at the construction site. The two environmental officers from HDEC and the main subcontractor need to continue to work together on implementing the site-based EMP and improving the environmental conditions. The revised site-based EMP from 6 August 2014 has been used for this review. HDEC is not adhering to the EMP in a number of areas. The environmental situation at the construction site is not adequate and many aspects are not compliant with the site-based EMP. Limited progress has been made by HDEC in addressing environmental issues raised during this reporting period. Key issues on site include: drainage, water metering, waste management, wastewater discharges, handling of hazardous materials such as bitumen, storage and disposal of hazardous wastes, vehicle washing area, and environmental monitoring and monthly reporting from HDEC, as well as compliance with the local environmental regulations.

The status of the EMP implementation as of the end of July 2015 is given at Annex 3.

Monitoring of the compliance with site-based EMP for April, May and June 2015 were carried out on the site by CS-MM and monthly environmental reports prepared and submitted to the PMU. HDEC submitted monthly environmental reports for January, February, March, April, May, and June 2015 to the PMU. HDEC's monthly environmental report for April, May and June 2015 were also reviewed by CS-MM to identify any non-compliance issues and to

evaluate environmental monitoring progress. The comments are included as appendices to the monthly environmental reports for April, May and June 2015. The main concern on the monthly environmental reports from the Contractor is that there are many statements in reports that are misleading. Some of the statements do not reflect the actual situation at the site, and some statements are not related or relevant to the mitigation measures. The reports lack information on key environmental issues such as mitigation measures, compliance with local regulations, payments, qualitative and qualitative environmental monitoring data, etc. Moreover, an additional concern is that the site specific EMP requires that HDEC's head office appoints an independent internal environmental audit team to audit the site annually and the results of audits to be included in the monthly environmental reports, but this had not been done as of end of June 2015.

It is required that the HDEC have a Project Execution Plan (POS - plan organizatsiya stroitelstvo). POS contains environmental measures as it is a requirement of the quarterly report to be submitted to the Environmental Committee. Once this is obtained, the HDEC can create the required Statements of Work (PPR - plan proizvodstvo raboti). Statements of work (PPR) are being prepared and submitted to the Employer/CS-MM for approval. At present the PPR does not contain any environmental measures. The PPRs are important and should state how much water is going to be used, how much soil is going to be supplied from borrow site and how much soil is going to be disposed to borrow site as well as how much waste is going to be produced and waste types , etc. It also includes where they will get permissions and where they will dispose of wastewater, waste, etc.

Moreover, the contractors are not providing any reports and statistics for the produced waste, waste water and emissions arising from the construction activities and operation/running of facilities such as the batch plant, vehicle washing area, fuelling area, vehicle maintenance, construction camps, etc., to the local Environmental Committee. The contractors are responsible for providing details of produced wastes and its disposal according to the article 2 and article 9 of the Ministerial decree of 1 May 2003. The HDEC should take immediate action to address this issue which was first raised in January 2014 and should to be closed.

Local environmental regulations require submission of quarterly reports to the Nishon branch of Kaskadaryanski Regional Environment Committee according to terms and conditions and conclusions of the Ecological expertise review. The PMU is submitting quarterly report to the Nishon branch of the Committee, the last quarterly report was submitted in April 2015.

3.2 Site inspections and audits

During the reporting period, in January and February 2015, the site monitoring was not conducted by both the PMU and TPP's environmental experts. After the mobilisation of the new international environmental expert, audit of compliance with the Environmental Management Plan and site monitoring were carried out on a monthly basis by CS-MM and Environmental Reports were prepared and submitted to the PMU in April, May and June 2015.

The TPP's environmental expert monthly conducted site monitoring and the PMU's representatives conducted site monitoring in May 2015. ADB conducted a review mission in June 2015.

Due to the absence of normative documents for the erection works, the regulatory compliance inspections have not yet been carried out by the local environmental authorities.

3.3 Non-compliance notices

During this reporting period, CS-MM issued 13 Non-Conformance Reports (NCR) on environmental issues to HDEC through the PMU. The summary and details of NCRs are as follows:

- Resource records keeping: No accurate monitoring of water usage at the project site. Keeping a resource records for water usage is required by the local environmental regulations, which is a high ranking risk.
- No waste log is kept for all type of wastes produced at the project site. Keeping a waste log is required by both the local environmental regulations and site based EMP, which is a high ranking risk.
- No waste separation to the domestic, metal scrap, used oil, paper, hazardous, etc., as well as no separate waste disposal area designated at the project site. Both local environmental regulations and site based EMP require waste separation and designation of separate waste disposal area in the project site, which is a high ranking risk.
- Normative documents (ПДВ (maximum permitted emissions to air), ПДО (maximum permitted waste disposal), ПДС (maximum permitted water discharges) and permits must be obtained from the local environmental authorities for temporary facilities such as the batching plant, two reinforcement shops, welding stations, inert material warehouses, hazardous chemical materials warehouses, vehicles washing, fuel station, two camps, two canteens, etc., which is a high ranking risk.
- No spill response kits are present at the project site, which is a medium ranking risk.
- Normative documents: ПДВ (maximum permitted emissions to air), ПДО (maximum permitted waste disposal), ПДС (maximum permitted water discharges) must be obtained for the erection works (montajnaya rabota) in the construction site from local environmental committee, which is a high ranking risk,
- The practice of burning of waste, wood, etc., on site, which is a low ranking risk.
- Bitumen is not handled in accordance with provisions of site based EMP as well as the local environmental requirements, which is a medium ranking risk.
- Wastewater and residue from cleaning of concrete-mixing equipment are discharged on the ground, which is a low ranking risk.
- Hazardous waste are not stored separately in accordance with the provisions of site based EMP and local environmental regulations, which is a medium ranking risk.
- The disposal of hazardous waste are not in accordance with site based EMP and local environmental regulations, which is a high ranking risk.
- The watering to control dust is not sufficient due to the summer conditions, which is a low ranking risk.
- The surplus excavated soils are not removed in a timely fashion from the construction site causing dust pollution due to summer conditions, which is a low ranking risk.

HDEC claims that there are no provisions in the EPC Contract allowing the PMU and/or CS-MM to issue NCRs on Environmental issues. This issue should be clarified between the PMU and HDEC.

3.4 Corrective action plans

HDEC is yet to take actions to rectify the NCRs and limited progress has been made to address environmental concerns raised previously during this reporting period. CS-MM is also concerned that the local environmental requirements are not being properly followed. The EIA clearly states that '' *as specified by law,* ***the contractor*** *will be required to retain an ecologic expert with EIA experience to prepare the CEAP and* ***obtain all relevant permits****. The contractor will not be permitted to mobilize the workers without an approved CEAP and the appropriate permits in place*''. Despite issues having been raised previously, there have been no steps taken to obtain normative documents for erection works from the local environmental authorities and ascertain local environmental reporting requirements. The main priority for HDEC is to obtain normative documents for the on-going erection works, which include ПДВ (maximum permitted emissions to air), ПДО (maximum permitted waste disposal), and ПДС (maximum permitted water discharges) for erection works. Due to the absence of the normative documents for erection works, the regulatory compliance inspections for the construction site has not been carried out by the local environmental authorities. This means that the environmental monitoring at site is not in line with the local statuary requirements. There is, therefore, a risk that the local authorities may stop the erection works due to the absence of normative documents, which will further delay the construction.

The mobilisation of the CS-MM's Environmental and Social specialist in early March 2015 has helped address a number of important issues. This included obtaining the required environmental permits from local environmental committee for temporary facilities such as batch plant, vehicle maintenance workshop, etc. This issue has been pending since the start of the project, and with advice and clear guidance from CS-MM, it will be concluded shortly. In this context, the HDEC signed a contract with a local licensed firm on 24 June 2015 to prepare the necessary documents to obtain the required environmental permits to become compliant with the local environmental regulations. It is expected that these permits will be obtained from the local authorities in a month time, which will address majority of the outstanding concerns.

3.5 Consultation and complaints

Grievances redress mechanism is in place at the project site. The logbook is available for logging of complaints at the TPP's entrance gate. A contact phone number and a contact email address were publicly made available at public consultation events and at the TPP entrance. Complaints will be reviewed by the TPP Environmental Management Team as part of each audit. There are no complaints received and logged on the logbook during the construction phase of the project by the stakeholders and local residents as of June 2015.

ANNEX 1. MONITORING DATA

Sound Level (dBA) / Уровень шума (дБА)						
Location Место	Test Date / Дата проверки				Limits Лимит	Remark Комментарий
	03.07.2015	10.07.2015	17.07.2015	24.07.2015		
Contractor Office Офис Подрядчика	49.4	40.8	39.9	41.6	85 dBA	Approve Одобрить
Contractor Camp Городок Подрядчика	52.2	44.1	46.6	43.4		Approve Одобрить
Power Block Gate У Ворот Силового Блока	65.3	66.3	61.7	62.1		Approve Одобрить
Power Bock Area #1 Участок Силового Блока #1	70.1	77.8	73.3	66.8		Approve Одобрить
Power Bock Area #2 Участок Силового Блока#2	68.3	63.9	66.9	63.4		Approve Одобрить
Cooling Tower Gate У Ворот Градирни	71.7	55.1	59.1	51.5		Approve Одобрить
Batch plant Бетонный Завод	72.3	54.7	62.5	48.3		Approve Одобрить
Subcontractor Camp area Городок Субподрядчика	57.6	56.9	60.7	58.3		Approve Одобрить
Existing Power Plant Gate Ворота Существующей ТЭС	48.0	64.5	61.8	58.4		Approve Одобрить
Nuristan Нуристан	55.8	55.2	65.8	56.7		Approve Одобрить
The Greenhouse of Existing TPP Теплица Существую	70.6	68.9	61.9	57.3		Approve Одобрить
Customs Warehouse Таможенный Склад	62.7	50.7	66.0	59.3		Approve Одобрить
Parking lot Автостоянка	69.1	70.1	69.3	54.7		Approve Одобрить

Noise monitoring data extracted from the HDEC Monthly Environmental Report of July 2015.

The Monitoring of: Контроль:		This Month В этом месяце	Cumulative Общий
Fuel(l) Топливо (л)	Diesel Дизель	72450	1420497
	Benzin Бензин	533	7534
Electricity (kv/h) Электричество (кв/ч)		13500	725460
Disposed Waste (tons) Отходы.		16.8	578.9
Water Вода (л)	Non-potable water (m^3) Вода негодная для питья	8412	141602
	Potable water (m^3) Вода годная для питья	1971	34687

Monitoring data extracted from the HDEC Monthly Environmental Report of July 2015.

Wastewater / Сточные воды

The sampling site / Место отбора проб: Sewage purification plant/ Канализационно очистительно сооружение. 23.02.2015

№	Наименование ингредиентов Name of ingredients	Едн.изм Unit	Водовыпуск Drainage outlet #1 КОС вход	ПДК MPC
1	Минеральные соли/ mineral salts	мг/л.mg/l	1540	1000
2	Взвешенные вещества/Suspended solids	мг/л.mg/l	33,4	30.0
3	Сульфаты/Sulfates	мг/л.mg/l	217	500
4	Хлориды/Chlorides	мг/л.mg/l	280	350
5	БПК-5/	мг/л.mg/l	3,4	6.0
6	Аммоний/Ammonium	мг/л.mg/l	0,4	2.0
7	Аммоний Нитрат/Ammonium nitrate	мг/л.mg/l	1,2	25.0
8	Аммоний нитрит/Ammonium nitrite	мг/л.mg/l	0,008	0.5
9	Железо/Iron	мг/л.mg/l	0.56	0.5
10	Нефтепродукты/Oil Products	мг/л.mg/l	0,02	0.3
11	Медь/Cooper	мг/л.mg/l	0,02	1.0
12	Показатель pH/Index pH	мг/л.mg/l	8.5	7.0

Место отбора проб : Канализационное очистительное сооружение

№ п/п	Наименование ингредиентов	Едн.изм.	Водовыпуск №1 КОС	ПДК
1	Минеральные соли	мг/л	1540	1000
2.	Взвешенные вещества	мг/л	33,4	30,0
3.	Сульфаты	мг/л	217	500
4.	Хлориды	мг/л	280	350
5.	БПК-5	мг/л	3,4	6,0
6.	Железо	мг/л	0,56	0,5
7.	медь	мг/л	0,02	1,0
8.	Показатель pH		8,5	7,0
9.	аммоний	мг/л	0,4	2,0
10.	Аммоний нитрат	мг/л	1,2	25,0
11.	нефтепродукты	мг/л	0,02	0,3
12.	Аммоний нитрит	мг/л	0,008	0,5

Watewater monitoring data extracted from the HDEC Monthly Environmental Report of February 2015.

Annex 2. Photographs

Photograph 1: Quarry area, surplus of excavated soil dumped on land adjacent to the quarry(29/05/2015)

Photograph 2: Construction site– inappropriate bitumen handling, no PPE, no spill response kits (12/05/2015)

Photograph 3: Construction site –contaminated soil with oil waste (05/05/2015)

Photograph 4: HDEC camp waste disposal area – no designated hazardous waste storage area , lamps-hazardous waste (27/05/2015)

Photograph 5: Vehicle maintenance area –oil wastes and spills and unproper handling of oil wastes (27/05/2015)

Photograph 6: Hazardous material storage at construction site-not arranged to store compatible materials (27/05/2015)

Photograph 7: Project site –
restoration works for exposed areas (05/05/2015)

Photograph 8: Batch Plant – no proper drainage wastewater is not channelled to the settling tanks (24/04/2015)

Photograph 9: Batch plant area– no dust control (18/05/2015)

Photograph 10: Workers Camp area- tidy and clean (05/05/2015)

Photograph 11: Vehicle maintanence area– no speration of waste, oily waste (27/05/2015)

Photograph 12: Vehicle washing area–no adequate drainage, no oil seperator (05/05/2015)

Photograph 13: Consonstruction site-no proper storage of construction wastes, (18/05/2015)

Potograph 14: Construction site-inproper waste bins, no seperation of wastes (05/05/2015)

Photograph15: Material storage area-water usage not measured, water is leaking(27.05.2015)

Photograph 16: Construction debris in the canal(18.05.2015

Annex 3: Revised Site Based Environmental Management Plan (HDEC, August 2014) with CSMM Status May 2015

No	No	Aspect Аспект	Mitigation Меры по снижению воздействия	Location Место	Monitoring Контроль	Responsible Ответственные	CS-MM comments as of the 31 June 2015
1	Management/ Управление						
	1.1	Informing	Introduce types of emission and countermeasures. Представьте виды выбросов и счетчиков мер.		Officialy Официально	1) PMU ГРП	This plan fulfills this point, and therefore it is considered complete as long as the EMP is periodically (every 6 months) updated for continual improvement.
	1.2	Emergency	a) Every three months has emergency drills. Провести противоаварийную тренировку в каждом три месяце. b) Confirms the role of individual Подтвердить индивидуальную ответственность.	Project Site Площадка проекта	Observation of emergency Наблюдение	1) Contractor Подрядчик 2) Subcontractor Субподрядчик	a) Yes. Emergency drills are taking place and are recorded in the HDEC Monthly Environmental Reports b) Yes
	1.3	Traffic	a) All traffic signs, signals, and road markings must be obeyed. Все дорожные знаки, сигналы и дорожные отметки должны быт соблюдены. b) Authorized transportation of equipments and materials entry to the site Уполномоченная перевозка оборудования и вступления материалов на сайт c) Speed of transport vehicles should be strictly	Project Site Площадка проекта	Inspection of traffic conditions Проверка	1) Contractor Подрядчик 2) Subcontractor Субподрядчик	a) Traffic signals and road signs are present on site. Drivers are occasionally observed driving too fast or talking on their phones while working however it is being controlled by HDEC. b) Yes - checks are made on a random basis c) Yes

			controlled in the access road to TPP Скорость транспортных средств должны быть строго контролированы на подъездных дорогах к ТЭС.				
	1.4	Monitoring	Monthly monitoring of the following should take place: ▪ Fuel (m^3)/ Топливо ▪ Electricity (KWh)/ Электричество ▪ Water (m^3)/ Вода	Project Site Площадка проекта	Observation use of sources Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Resource records need to be improved. HDEC needs to have more detailed and accurate information. The water meters have not been installed properly and the actual consumption is not recorded. This is unacceptable. *Phograph 15* Overall more environmental resource monitoring needs to take place. See **Ошибка! Источник ссылки не найден.** for more information on this.
2	Air / Воздух,						
	2.1	Plan / План	Identify all possible air pollution sources related to construction activities Определить все возможные источники загрязнения воздуха.	Project Site Площадка проекта	Examination of air plan Оценка	1)Contractor Подрядчик	HDEC should provide the plan to CS-MM and the PMU. **Conclusion of ecological expertise as well as ПДВ (maxmimum permitted emissions to air) needs to be obtained from local environmental authorities,**
	2.2	Exhaust fumes Выхлопные газы	a) Regularly serviced and maintained to be in good condition vehicles and Equipment Транспортные средства и оборудование постоянно обслуживаются и поддерживаются в хорошем состоянии b)Forbid the burning of coal, waste, or wood	Maintenance Area Зона обслуживания Project Site	Inspection of air emission Проверка	1)Subcontractor Субподрядчик 2)Appropriate manager	a) Yes - vehicles in bad condition are repaired. The vehicle rental company needs to supply vehicles in good condition. The on-site vehicle repair shop is

			on site Запретить сжигание угля, отходов или дерева на площадке c)Reduce idle time of all vehicles Уменьшить время простоя всех транспортных средств	Площадка проекта	Observation of air polution Наблюдение	Соответствующий менеджер	operational and in good condition. b) Yes – no burning is observed on site. c) Yes – vehicles are not seen idling.
3	Dust / Пыль						
	3.1	Plan / План	Identify all possible dust pollution sources related to construction activities Определить все возможные источники загрязнения пылью, связанные со строительными работами	Project Site Площадка проекта	Examination dust plan Оценка	1)Contractor Подрядчик 2)PMU ГРП	**HDEC should provide CS-MM/PMU with the official list of dust sources; at the moment the environmental officers have only determined the sources informally.** *Photograph 9* **Conclusion of ecological expertise needs to be obtained from local environmental authorities**
	3.2	Watering Увлажнение	Watering shall be implemented to control dust where Увлажнение должно быть применено для контроля запыленности: a) Working areas Рабочие зоны b) Exposed areas Открытые зоны c) Active cuts excavation and fill sites Действующие срезы выемки и засыпки	Project Site Площадка проекта	Observation of watering Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a, b, c) The roads are watered 6 times per day using a water truck. Furthermore stockpiles and exposed areas are also frequently watered. **It is unknown where the water truck is filled up and the monthly environmental reports do not record the actual quantities of water used.**
	3.3	Site control Контроль площадки	a) Minimize size and duration of exposed areas Минимизировать размер и продолжительность открытых зон	Project Site Площадка	Observation dust control Наблюден	1)Contractor Подрядчик	a) Yes – exposed areas are kept to a minimum wherever possible. Exposed areas are restored

			b) Keep hauling roads in good condition Сохранить транспортировочных дорог в хорошем состоянии.	проекта	ие	2)Subcontractor Субподрядчик	*Photograph 7* b) Yes - hauling roads are in decent condition, however no engineering of the access roads has taken place.
	3.4	Material control Контроль материалов	Minimize size and duration of materials stockpiles Минимизировать размер и продолжительность склада материалов.	Lay down Складская площадка	Observation material storage Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Yes – size and duration of stockpiles are kept to a minimum.
	3.5	Material control Контроль материалов	a)Minimum practical height to limit the fugitive dust generation from unloading excavated materials Высота, с которой выкопанные материалы сбрасываются, должна контролироваться до минимальной практической высоты для ограничения образования сдуваемой пыли от разгрузки. b) Cement debagging should take place in a sheltered area. Вынимание из мешков цемента должно происходить на закрытой площадке	Project Site Площадка проекта Batching Plant area	Observation of work Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes – training has been provided on how to control dust related to excavated materials. Dust is still abundant during excavation on windy and dry days but its difficult to practically reduce this. b) Yes – cement is deposited directly from the train into the bunkers.
	3.6	Vehicle control Контроль транспортных средств	a) Limiting vehicle-entrained dust from unpaved roads Ограничивать пыль, поднимаемую транспортными средствами, с грунтовых дорог b) Limiting vehicle speeds (20 km/h in Project Site) and restricting traffic volumes Ограничение скорости транспортных средств и ограничения объемов	Project Site road Дорога площадки проекта	Observation of traffic condition Наблюдение	1) Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes - all roads on site are currently unpaved, however dust is being controlled b) Yes - there are signs on the road limiting speed and vehicles are controlled by HDEC c) Yes d) Yes

			транспортных потоков c) Trucks have proper fitting side and tail boards Грузовики должны иметь подходящие боковые и задние откидные стенки d) Materials shall also be dampened, if necessary, before transportation Материалы также должны быть увлажнены, если необходимо, перед транспортировкой e) Covering trucks during transport of materials (if required) Накрывать грузовики во время транспортировки материалов				e) Not presently necessary
4	Noise / Шум						
	4.1	Plan / План	a) Identify all possible noise pollution sources related to construction activities Определить все возможные источники шума, относящиеся к строительным работам b) Posting Signboards on construction sites and/or stickers on equipment outlining how affected parties can lodge complaint Установить вывески на строительных площадках и/или наклейки на оборудование с изложением как заинтересованные стороны могут подать жалобу.	Project Site Площадка проекта	Examination of noise plan Оценка	1)Contractor Подрядчик 2) Subcontractor Субподрядчик	**a) They have not been identified in a formal or systematic way. This should be improved and a list should be provided to CS-MM/PMU** **Conclusion of ecological expertise needs to be obtained from local environmental authorities** **b) Not taking place**
	4.2	Noise level Уровень шума	a) Inspect noise level of the construction equipment Проверить уровень шума с использованием строительного оборудования b) Equipment Noise limit will comply with Item 223 of EIA. For example. Direction of Nuristan are limited	Project Site Площадка проекта	Inspection of noise level Проверка	1)Contractor Подрядчик 2)Subcontractor Субподр	a, b) Noise levels are inspected 4 times per month using a hand held device. The results are provided to CS-MM and the PMU in the environmental monthly reports. **It is advised to also record the time of the**

			to 80 dba 1m Оборудование определения шума будет соответствовать пункту 223 ОВОС. Например. Направление Нуристан ограничен на 80 дБА 1м c)Use appropriate PPE (earplug, earmuff) if exceeds noise limits Используйте соответствующие СИЗ (затычка для уш,наушник), если превышает пределы шума			ядчик	**measurements.** **c) Not everyone is wearing appropriate PPE for high-level noise. Site staff have been instructed to wear ear protection.**
	4.3	Vehicle control Контроль транспортных средств	a) Limiting vehicle speeds (20 km/h at Project Site) Ограничение скорости транспортных средств b) Restrict truck movements at night time and restrict truck movements to major transport routes Ограничить передвижение грузовиков только в ночные часы и ограничить передвижение грузовиков к основным транспортным маршрутам.	Project Site road Дорога площадки проекта	Observation of traffic control Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes – there are occasionally some violations but HDEC is keeping this under control b) Yes – trucks are not currently being used during night shifts
	4.4	Vehicle control Контроль транспортных средств	Regularly serviced and maintained to be in good condition vehicles and Equipment Транспортные средства и оборудование постоянно обслуживаются и поддерживаются в хорошем состоянии	Maintenance area Зона обслуживания	Inspection of repair records Проверка	1)Subcontractor Субподрядчик 2)Appropriate manager Соответствующиймендер	Yes. There is a vehicle repair workshop on site. All vehicles are kept in good working condition and HDEC is controlling this. Random checks are carried out and inadequate vehicles are removed. **The environmental officer should have a plan for checking the maintenance plans of vehicles and be able to carry out spot**

							checks.
	4.5	Equipment control Контроль оборудования	a)Equipment shall be operated within specifications and capacity Оборудование должно использоваться в пределах спецификаций и мощности b) Equipment shall be operated in as diversified a manner as possible Оборудование должно использоваться максимально диверсифицировано c) Equipment shall be turned off when not in use Оборудование должно выключаться, когда не используется d) Work using machines or vehicles shall be prohibited at night shift work time. Работы с использованием машин или транспортных средств должны быть запрещены в ночное время. e)Air intakes, vents, and stacks should be fitted with suitable noise attenuating equipment (if required) Воздухозаборники, вентиляторы и вентиляционные каналы должны быть оборудованы соответствующим шумопоглощающим оборудованием (при необходимости)	Project Site Площадка проекта	Observation work of equipment Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes b) Yes c) Yes d) Yes - heavy machinery is not being used during night shifts. In the case that it is needed, a working permit must be obtained. e) Yes – vendor packages are being examined to ensure they have the appropriate devices.
	4.6	Equipment control Контроль оборудования	Select the time when the environment is least sensitive to noise impact using pile drivers, jack hammers, and rock drills Выбрать время, когда окружающая среда наименее чувствительна к воздействию шума при использовании сваебойных каперов, отбойных молотков и буров	Project Site Площадка проекта	Inspection of noise level Проверка	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Yes – this is taking place and it should also be noted that the construction site is not near to any sensitive receptors.

5	Waste water / Сточные воды						
	5.1	Plan / План	Identify all possible wastewater pollution sources related to construction activities Определить все возможные источникисточных вод, относящиеся к строительным работам	Project Site Площадка проекта	Examination of wastewater plan Оценка	1)Contractor Подрядчик	**They have not been identified in a formal or systematic way. This should be improved and a list should be provided to CS-MM/PMU** **Conclusion of ecological expertise as well as ПДС (maximum permitted water discharges) needs to be obtained from local environmental authorities** .
	5.2	Batch plant control Контроль РБУ	Waste water from concrete batching plant operation and shall not be discharged overland Сточные воды, образованные от работы РБУ, не должны сбрасываться на поверхность земли	Batching Plant area Зона РБУ	Observation of wastewater Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**Inadequate. The draining as the batch plant is not adequate. This issue has been raised constantly in all monthly environmental reports of CS-MM. The drawings for the drainage plans need to be improved and implemented as soon as possible.** As the batch plant is operational on site, **Conclusion of ecological expertise as well as ПДВ (maxmimum permitted emissions to air) ПДО (maxmimum permitted waste disposal), ПДС (maximum permitted water discharges) needs to be obtained from local environmental**

							authorities *Photograph 8.*
	5.3	Washing water Промывочная вода	Undertake settling and neutralization of alkaline washing water containing excessive cement prior to discharge Произвести осадку и нейтрализацию воды щелочения, содержащей большое количество цемента, до утилизации	Batching Plant area Зона РБУ	Observation of washing water Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**Inadequate. The settling ponds at the batch plant are operational, but not used and they are not properly constructed or designed. The batch plant is in full operation.** *Photograph 8*
	5.4	Washing water Промывочная вода	a) All washing of equipment or machinery shall be undertaken in designated areas Мойка всего оборудования и машин должна производиться в обозначенных зонах b)Washing of equipment areas must be equipped with a suitable impermeable floor and sump/oil trap Зоны мойки должны быть оборудованы подходящими водонепроницаемыми полами источными колодцами / маслоуловителями.	Truck washing area Зона промывки	Observation of washing area Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**a) No – there is a vehicle washing area on site, however vehicles are not always washed there.** *Phograph12* **b) Inadequate – the vehicle washing area is not properly paved and the oil trap is not functional. This needs to be improved as soon as possible.** As the vehicle washing is operational on site, **Conclusion of ecological expertise as well as ПДВ (maxmimum permitted emissions to air), ПДО (maxmimum permitted waste**

							disposal), ПДС (maximum permitted water discharges) needs to be obtained from local environmental authorities *Photograph 12*
	5.5	Waste water emission Выделение сточных вод	Waste water collected within bunded area around the fuelling area be disposed of as hazardous waste Сточные воды, собранные внутри зоны обваловки вокруг заправочной зоны, должны быть утилизированы как опасные отходы	Fuelling area Зона заправки	Observation of wastewater Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**Inadequate. The refueling area does not have proper drainage and therefore the wastewater cannot be collected and discharged effectively.** As the fueling station is operational on site, **Conclusion of ecological expertise as well as ПДВ (maxmimum permitted emissions to air), ПДО (maxmimum permitted waste disposal), ПДС (maximum permitted water discharges) needs to be obtained from local environmental authorities**
	5.6	Natural water Естественные воды	Natural run-off diverted away from any camps Естественный сток должен быть отведен от строительного городка	Camp area Зона строительного городка	Observation of natural water Наблюдение	a)Contractor Подрядчик b)Subcontractor Субподрядчик	Yes – natural runoff is not entering any of the camps. There have been no heavy rains.
	5.7	Rain water Дождевая вода	Rain water plan to be and implemented for the construction phase of the Project План дождевых вод должен быть применен	Project Site Площадк	Observation of rain water	a)Contractor Подрядч	**HDEC should provide the rain water plan to CS-MM and the PMU.**

			для строительной фазы Проекта.	а проекта	Наблюдение	ик b)Subcontractor Субподрядчик	There has been no heavy rain during this reporting period.
	5.8	Contaminated water Загрязненная вода	Sand, silt and silt-laden water do not enter the water drain system or KMC Песок, осадок и вода, насыщенная взвешенными наносами не должны попадать в систему дренажа сильных дождевых вод или КМК	Project Site Площадка проекта	Observation of water system Наблюдение	a)Contractor Подрядчик b)Subcontractor Субподрядчик	a) Yes this is being controlled.
	5.9	Material control Контроль материалов	a) All hazardous material storage areas designed to reduce risk of spillages Все зоны хранения опасных материалов должны быть спроектированы для уменьшения риска утечек b) All materials covered during transport to prevent them from spilling (if needed). Все материалы должны быть накрыты во время транспортировки для предотвращения утечки (При необходимости). c)Store all liquid/solid waste properly above ground to avoid spills/leaks Хранение всех жидких/твердых отходов как следует над землей во избежание розлива/утечки d)Develop a hazardous materials and handling plan .provide spill response kits at all HazMat storage areas and work site Разработать план опасных материалов и	Material storage areas Зоны хранения материалов	Observation of material storage condition Наблюдение	a)Contractor Подрядчик b)Subcontractor Субподрядчик	a) Yes – there are hazardous materials on site at the moment and there is only one storage area designated for all hazardous materials. But, it should be arranged such as to store in compatible materials, *Photograph 6* b) Not necessary to cover materials. c) Yes – there is minimal liquid waste, and all solid waste is stored above ground. d) **Spill kits are not currently available on site. They need to be provided in all areas where hazardous material will be stored and employees must be trained on how to**

			обработки. Предоставить комплектов ликвидации разливов на всех местах хранения Опасные вещества и на рабочих сайтах. e) Chemicals and fuels on site should be kept to a minimum Химикаты и топлива на площадке должны храниться в минимальном количестве				**use them. Not all workers are aware of what a spill response kit is or what the procedure is if there is a spill.** However there are oil spill trays located at the vehicle repair shop. e) Yes – chemicals and fuels are being kept to a minimum.
	5.10	Straining Фильтрование	Construct of dirt trap, interceptor pond and the attenuation dam (if required) commenced as early as possible in the construction phase Строительство грязеуловителя, отстойника коллектора сточных вод и сдерживающей плотины (при необходимости) должно быть произведено как можно раньше до начала фазы строительства.	Project Site Площадка проекта	Observation of strain system. Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Not necessary
	5.11	Hazardous waste Опасные отходы	Storage of hazardous waste in bunded areas to avoid leaks escaping to the ground or nearby surface waters Хранение опасных отходов в обвалованных местах, чтобы избежать утечек на землю или поблизости поверхности воды	Hazardous waste bunded area	Observation of harzardous waste Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	There is no designated hazardous waste storage area for storage of hazardous waste. Hazardous waste has not been identified in large quantities on site. *Photograph 4*
	5.12	Monitoring Контроль	a) Monitoring water quality according to local standards Контроль качества воды в соответствии с местными стандартами. b) Water samples, sent to Talimarjan TPP laboratory to be tested for water quality. Образцы воды, отправленные на местной	Project Site Площадка проекта	Experimentation of waste water	1)Laboratory Лаборатория	a) Water quality results both for drinking water and wastewater were presented in the HDEC environmental monthly report. Some substances were found over the MPC limit. **Furthermore the quality indicators for discharge do**

			лаборатории, которые будут проверены на качество воды.				**not show the locations and quantities of discharge.** b) No – water samples are not sent to the Talimarjan TPP laboratory. The laboratory has no accreditation certificate.
6	Soil / Почва						
	6.1	Plan / План	Identify all possible soil pollution sources related to construction activities Определить все возможные источники загрязнения почвы, относящиеся к строительным работам	Project Site Площадка проекта	Examination of soil plan. Оценка	1)Contractor Подрядчик	**They have not been identified in a formal or systematic way. This should be improved and a list should be provided to CS-MM/PMU** **How and Where contaminated soil disposed is questioned** *Phograph 3* **Conclusion of ecological expertise needs to be obtained from local environmental authorities**
	6.2	Site control Контроль площадки	a) Minimize size and duration of exposed areas Минимизировать размер и продолжительность открытых зон b) Minimize the excavation during construction of fuel oil Минимизировать экскаваторные работы во время строительства дамбы топливного масла и известняка c) Minimize the overall slope of the site Минимизировать общий откос площадки d) Ensure good landscaping and erosion control Гарантировать хороший контроль благоустройства и разрушения	Project Site Площадка проекта	Observation of soil emission Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes b) This point is still unclear c) Yes – the overall slops of the site are being controlled d) Yes – there are no observed erosion risks on site, especially given the climate

	6.3	Covering Накрытие	a)Exposed slope surface shall be covered during the rainy day Открытая поверхность скоса должна быть накрыта в дождливые дни b)Open stockpiles of construction materials covered during rainy day Открытые склады строительных материалов должны быть накрыты во время ливней	Project Site Площадка проекта	Observation of material store Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a, b) There have been no heavy rains during this reporting period.
	6.4	Sediment Осадок	Sediment tanks can be used for settling wastewater prior to disposal Грязеуловители достаточной могут быть использованы для осаждения сточных вод до утилизации	Equipment Maintenance, Batch plant and Truck washing areas	Inspection of sediment tank ability Проверка	1)Contractor Подрядчик b)Subcontractor Субподрядчик	**Sediment tanks have not been properly constructed or installed. This needs to take place.** See comments to points 5.2, 5.3, 5.4, and 5.5
	6.5	Drainage facilities Дренажные устройства	All drainage facilities, erosion and sediment control structures shall be regularly inspected and maintained Все дренажные сооружения, конструкции контроля осаждения и эрозии должны постоянно проверяться и обслуживаться		Inspection for maintenance Проверка	a)Contractor Подрядчик b)Subcontractor Субподрядчик	**The drainage facilities at the construction site are inadequate.** See comments to points 5.2, 5.3, 5.4, and 5.5 *Photograph 8, 11,*
	6.6	Vehicle control Контроль транспортных средств	a) All vehicles must be cleaned once in a week Все транспортные средства должны быть очищены один раз в неделю. b) Ensure no earth, mud, debris and the like is deposited by them on roads Обеспечить, чтобы земля, грязь, строительный мусор и тому подобное не скапливались на дорогах	Equipment maintenance shop	Observation of traffic condition Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**a) No Vehicles are washed on a regular basis however the vehicle washing area needs to be improved. See comment on point 5.4** b) Yes – roads are kept clean and free of debris
	6.7	Road control Дорожный	a) All road works separated from surface waters	Project Site road	Observation of traffic	1)Contractor	a) N/A - No road works are taking place as of yet

		контроль	Все дорожные работы должны быть отделены от поверхностных вод b) All roads shall be properly sloped and have adequate culverts to manage run off Все дороги должны быть скошены надлежащим образом и иметь соответствующие водоспуски для управления стоками c) Earth works to construct drainage ditches and to lay subsurface drainage conduits Земляные работы для строительства дренажных канав и для прокладки каналов подпочвенного дренажа	Дорога площадки и проекта	condition Наблюдение	Подрядчик 2)Subcontractor Субподрядчик	b) No road works as of yet, but current access roads are not sloped, paved, and do not have any engineered drainage c) No road works as of yet, however the current access roads do not have drainage ditches or conduits
	6.8	Excavated material Материалы выемки	a) Excavated materials possible to used reclamation fill Материалы выемки могут быть использованы для повторного заполнения b) Surplus excavated materials quarry over burden, rock rejected for aggregate, aggregate surplus to the requirements and the like not discarded indiscriminately Излишние материалы выемки, избыточные камни, камни, не принятые для заполнения, излишние заполнители и тому подобное не должны беспорядочно списываться c) Different types of surplus excavated materials deposited separately in the spoil dumps designated for the purpose outside the Project site Различные типы материалов выемки могут накапливаться отдельно в отвалах вынутого грунта, предназначенных для данной цели за пределами площадки	Project Site Площадка проекта	Observation of excavated material Наблюдение	1)Contractor Подрядчик 2) Subcontractor	a) Yes b) Yes – this is being controlled by HDEC c) Yes, but surplus excavated soils sometimes are dumped on adjacent land to the quarry *Photograph* 1
7		Overall Spill Control/ Общая управления разливов					
	7.1	Management Управление	a) Any spillage of fuel shall straight away be absorbed using sand or other absorbent	Project Site	Observation spill	1) Contract	**a) Not adequate – workers are not trained on spill**

			materials Любая утечка топлива должна быть незамедлительно впитана с использованием песка или других впитывающих материалов. b) Develop spill response plan разработать план ликвидации разливов. c) Only people with adequate training and knowledge should handle fuel and chemicals to avoid spills Только люди с адекватной подготовкой и знанием должны управлять топливо и химические вещества, чтобы избежать от утечек. d) Fuelling should be one on concrete surface provided with spill catch tank that can be easily cleaned and all spilled fuel recovered/safety disposed Заправка топливом должна происходить на бетонном покрытии, снабженном коллектором утечки который легко моется и все разлитое топливо восстанавливается /безопасно хранится e) All repair and maintenance work to be done either on concrete surface with oil spill catch basins or oil catch pans provided at all service areas Все ремонтные работы и работы по техническому обслуживанию должны проводиться на бетонной поверхности с коллектором для масла или поддоном-ловушкой для масла, которые должны быть предоставлены на всех сервисных площадках	Площадка проекта	Наблюдение Examination of spill plan Оценка Observation of spilling Наблюдение	or Подрядчик 2) Subcontractor Субподрядчик	**control and there are no spill kits available on site.** *Photograph 2* **b) HDEC has an internal spill response plan and this plan should be well communicated to and implemented by all subcontractors** **c) More training should be provided to subcontractors regarding spills and fuel handling.** **d) Inadequate – fuelling is done on a concrete surface however there is no spill catch tank** e) Yes – the repair and maintenance workshop is concrete and there is oil spill tray. f) Yes g) Yes h) Waste oils are not produced in large enough quantities to be recycled. i) Yes

			f) Routinely inspect all equipment handling hazardous materials for leaks and spills monthly Регулярно проверять все оборудование оперирующего с опасными материалами на утечки и розлив g) All fuel where spills and leakage area possible e.g. the generator, must have basins installed to prevent leakage На всех местах где возможна утечка и розлив топлива, например генератор, должны быть предоставлены резервуары для предотвращения утечки h) The recovered materials must be recycled monthly Вторичное сырье должно перерабатываться i) Fuelling equipment must be fitted with proper fuel nozzles and devices to avoid accidental spills Заправочное оборудование должно быть оснащено должными топливными форсунками для предотвращения случайных утечек				
	7.2	Storing Хранение	a) All fuel stored on site shall be kept in drums or in bulk tanks Все топливо, хранимое на площадке, должно держаться в металлических бочках или наливных цистернах b) Fuel storage are a be locate data designated place away from any source of ignition or open drain Зоны хранения топлива должны быть расположены в определенном месте вдали	Fuel Storage area Зона хранения топлива	Observation of oil storage Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) Yes – fuel is kept at the refueling area in two large tanks (the area around should be paved over to contain accidental spills) b) Yes c) Yes **d) Inadequate – the concrete embankment needs to be improved.**

			от любых источников возгорания или открытого дренажа c)"**NoSmoking"** sign displayed at the storage location and a charged fire extinguisher of the correct type Знак **«Не курить»** должен быть повешен в месте хранения и заряженный огнетушитель соответствующего типа должен быть готов к использованию. d) All fuel tanks and storage areas provided with concrete embankments to readily contain spills Все топливные баки и зоны хранения должны быть предусмотрены с бетонным защитными дамбами для удержания утечек e) Provide spill response kits at all working areas Обеспечить комплектов ликвидации разливов на всех рабочих местах				**e) Inadequate – there are no spill response kits on site.** *Photograph 2.*
	7.3	Oil emission Выброс масла	Treat oily wastewater in coalescence separator prior to discharge Обрабатывать нефтезагрязненные промстоки в сепараторе-коагуляторе до слива.	Project Site Площадка проекта	Observation of oily water Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**Inadequate – there is no oil separator at the vehicle washing area. This needs to be improved as soon as possible.** *Photograph 12.*
	7.4	Refueling Заправка	Refueling of vehicles shall take place only in designated areas Заправка автомобилей будет пройти только в специально отведенных местах.	Fuel Storage area Зона хранения топлива	Observation of refuelling Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Yes

	7.5	Training Обучения	Fuel handling training shall include chemical handling in the training program for assigned personnel. Обучения управлением топливо будет включить в себе химическую обработку в программе подготовки для назначенных персоналов.	Training Center Центр обучения	Training of oil handling Обучение	Contractor Подрядчик	**Training needs to be increased to include environmental emergency situations and chemical handling**
8		Waste control/ Контроль отходов					
	8.1	Plan / План	a) Identify all possible waste pollution sources Определить все возможные источники отходов b) Procedures detailed in the Material Safety Data Sheet (MSDS) for hazardous materials included in pollutants spillage control plan and followed in the event of an emergency situation Процедуры, детально описанные в Листах данных безопасности материалов для опасных материалов, должны быть включены в план контроля утечки загрязнителей и соблюдаться в случае чрезвычайной ситуации. c) Should have "Keep a waste log" for all type of wastes produced in construction area. Должен иметь "Журнал для отходов» для всех типов отходов, образующихся в строительной площадки.	Project Site Площадка проекта	Examination of waste plan Оценка	1)Contractor Подрядчик	**a) They have not been identified in a formal or systematic way. This should be improved and a list should be provided to CS-MM/PMU** **Conclusion of ecological expertise as well as ПДО (maxmimum permitted waste disposal) needs to be obtained from local environmental authorities.** **b) The spillage control plan needs to be better communicated to all subcontractors** **c) There is no waste log describing the quantities and types of waste produced on site. It is a requirement of this plan and local environmental regulations.**
	8.2	Waste Disposal Утилизация отходов	Dispose unusable waste streams at permitted waste disposal facilities Ликвидировать непригодные потоки отходов в разрешенных местах удаление отходов	Disposal facilities Установки утилизации	Observation of waste facility Наблюдение	Waste disposal company Организация коммунальных	the contractor has a contract with a waste disposal company. Waste from the vehicle maintenance area is taken away and deposited by the vehicle rental company. **Conclusion of ecological**

						хозяйств	**expertise as well as ПДО (maxmimum permitted waste disposal) needs to be obtained from local environmental authorities.**
	8.3	Waste disposal Утилизация отходов	a) Separate waste disposal area shall be designated on the construction site Отдельная зона утилизации отходов должна быть разработана на строительной площадке b)Separate waste disposal area contains clearly demarcated skips and bins to allow different types of waste Отдельная зона утилизации отходов содержит разграниченные контейнеры и мусорные баки для разделения различных типов отходов c) Waste is separated into non-hazardous and hazardous / potentially hazardous prior to reuse, recycling or transport to Landfill Разделение отходов на неопасные и опасные / потенциально опасные перед повторным использованием, переработкой или транспортировкой на свалку. d) Must be separated to the domestic, metal scrap, used oil, paper, hazardous etc. Должны разделяться на внутренний, металлолом, отработанные масла, бумаги, опасные и т.д.	Disposal area Зона утилизации	Observation of waste control Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик 3)Disposal company Утилизирующая компания	**a) No- there is no separate waste disposal area for hazardous waste** *Photograph 4* **b) There are different bins for different types of domestic waste however waste separation is not taking place properly and needs to be improved. Some form of waste identification is required on each and every bin in both Uzbek and Russian.** **c) No- waste is not separated into non-hazardous and hazardous/potentially hazardous** *Photograph 13, 14*

	8.4	Reuse Вторичное использование	a) Re-use the waste during construction Вторично использовать отходы во время строительства b) Re-use or recycle waste streams to other users at other locations Вторично использовать потоки отходов к другим пользователям в других местах c)The design of formwork will maximize the use of standard wooden panels Проект опалубки будет увеличить использование стандартных деревянных панелей d)Alternatives such as steel formwork or plastic facing can be considered to increase the potential for re-use Альтернативы, такие как стальная опалубка или пластмассовая облицовка, могут быть учтены для увеличения возможного повторного использования	Project Site Площадка проекта	Observation of reuse waste. Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a, b) Yes – reuse takes place where possible. c) Yes d) Yes
	8.5	Recycle Waste Переработка	Develop dedicated area for storage of recycled material away from active construction works and near site access point Разработать отдельную зону для продажи переработанных материалов от действующих строительных работ и около места доступа на площадку.	Out of the project site Вне площадки	Training of waste disposal Обучение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Behind the rebar shop at the cooling tower there is a temporary storage area for scrap metal. **There are bins near the administration building for domestic waste disposal. However they are not being used properly.**
	8.6	Rubbish bins Мусорные баки	a) Provide sufficient bins with lids to store the solid waste produced on a daily basis Предоставить достаточное количество баков с крышками для хранения твердых отходов,	Project Site Площадка	Observation of waste disposal Наблюдение	1)Contractor Подрядчик	**a) The quantity of waste bins should be increased. Some of the bins provided are too heavy to be manually lifted**

			производимых ежедневно. b) Bins not allowed to become overfull and shall be emptied as a minimum on a weekly basis Баки не должны быть переполнены и должны опустошаться как минимум еженедельно.	проекта	ие	2)Subcontractor Субподрядчик 3)Disposal company Утилизирующая компания	**and therefore need to be emptied using shovels resulting in a high waste to human contact, which is a health risk.** *Photograph 14* b) The bins are emptied in a timely manner by the waste disposal company
	8.7	Rubbish bins Мусорные баки	Install signage encouraging use of rubbish bins on site and in construction camps Установить знаки, рекомендующие использование мусорных баков на площадке и в строительном городке	a)Project Site Площадка проекта b)Camp	Observation of waste disposal Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик 3)Disposal company Утилизирующая компания	**Yes –however inadequate signage and proper separation of waste does not take place.** *Photograph 14*
	8.8	Discharge Сброс	Prohibit dumping of dredge material in canal or elsewhere on site Запретить сброс вынутого грунта в КМК, канал и прочие районы на площадке	Project Site Площадка проекта	Observation of dumping Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Construction debris in the canal *Photograph 16*
	8.9	Storing Хранение	a) Design and implement a temporary waste storage area for domestic waste located away from living and eating areas	Project Site Площадк	Observation of waste store area	1)Contractor Подрядч	a.) Yes, but not in accordance with local environmental regulations

			Разработать и применить место временного хранения отходов для бытовых отходов расположенного вдали от жилых мест и мест употребления пищи b)Separation of storage of hazardous and non-hazardous waste Отдельное хранение опасных и неопасных отходов	а проекта	Наблюдение	ик 2)Subcontractor Субподрядчик	**b.) no separation of storage of hazardous and non-hazardous waste** Photograph 4, 13, 14
	8.10	Storing Хранение	Containers used for the storage of chemical wastes shall Контейнеры, используемые для хранения химических отходов, должны a) Be suitable for the substance they are holding, resistant to corrosion, maintained in a good condition, and securely closed Подходить для веществ, которые в них хранятся, быть устойчивыми к коррозии, содержать в хорошем состоянии, и плотно закрываться b)Stored chemical in roofed areas with concrete flooring. Хранить химикаты в местах с крышей и бетонным полом.	Storage area Зона хранения	Observation of waste store area Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	a) The containers are not suitable for storage of chemical wastes. There is minimal chemical waste produced on site. b) Yes- chemical materials are stored in roofed area with concrete flooring. (Note: here the wording and content of b) is not clear if it is related to the chemical materials or chemical waste) **Conclusion of ecological expertise needs to be obtained from local environmental authorities**
	8.11	Storing Хранение	The storage area for chemical waste shall Зона хранения химических отходов должна a) Be located away from surface water bodies. Находиться вдали от поверхностных вод b) Be constructed with a weatherproof cover, concrete floor with bunding, and with adequate securable storage bins for waste. Быть построена с устойчивой к погоде крышей,	Project Site Площадка проекта	Observation of waste store area Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	**a) There is no chemical waste storage area in the project site** **b) No** **c) No** **d) No** **e) No** **f) No**

			бетонным полом с обваловкой и с соответствующими закрепляющимися баками для отходов c) Have appropriate signage and signage system. Иметь соответствующие знаки и систему вывесков. d) Be clearly labeled and used solely for the storage of chemical waste. Быть четко промаркированной и использоваться исключительно для хранения химических отходов e) Been closed on at least 3 sides. Быть закрытой как минимум с трех сторон f) Be arranged such as to separate in compatible materials Быть организованной таким образом, чтобы разделять несовместимые материалы				
	8.12	Training Обучение	Include information on solid waste management in construction worker training program Включить информацию об управлении твердыми отходами в программу обучения строительных рабочих	Training center Учебный центр	Training of waste disposal Обучение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Yes – this is taking place in the monthly HSE meetings and in the induction sessions for workers.

	8.13	Separating Сортировка	Wood and other scrap material with a commercial value shall be separated and stored in segregated areas prior to removal Дерево и прочие отходы с коммерческой ценностью должны быть отделены и храниться в раздельных зонах до удаления	Project Site Площадка проекта	Observation of waste control Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Yes – there is a scrap metal storage area behind the rebar workshop in the cooling tower area.
	8.14	Battery Батареи	a) The dead batteries will be given to specialized organizations for reuse Отработанные батареи будет переданы специализированным организациям для повторного использования	Project Site Площадка проекта	Observation of battery Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик	Batteries are removed by the vehicle rental company **Conclusion of ecological expertise needs to be obtained from local authorities**
	8.15	Chemical waste Химические отходы	Disposal of chemical waste shall Утилизация химических отходов должна a) Be treated by a licensed waste collector. Обрабатываться лицензированным коллектором отходов b) Be to a facility licensed to receive chemical waste, such as the chemical waste treatment Быть учреждением, лицензированным на получение химических отходов, таким как учреждение обработки химических отходов c) Hazardous and toxic waste shall not be disposed of on the canal Опасные и токсичные отходы не должны утилизироваться в канал d) Hazardous waste shall be removed from the site property within 6 month.	Project Site Площадка проекта	Observation of chemical waste Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик 3)Waste collector Коллектор отходов	a, b) There are plans in place for this. **Conclusion of ecological expertise needs to be obtained from local authorities** c) Yes d) Yes e) Yes – **although there is potentially oily waste that is not being disposed of properly at the refueling area, and vehicle maintenance area.**

			Опасные отходы должны быть удалены с площадки в течение 6 месяцев. e) Hazardous waste shall not be dumped onto the ground, into rain water sewers or into sanitary sewer system Опасные отходы не должны сбрасываться на землю, дождевые стоки или санитарные стоки				
	8.16	Waste of catering Кухонные отходы	a)Catering wastes is divided into food waste and non-food waste Кухонные отходы подразделяются на пищевые и непищевые отходы b)All organic food waste generated by kitchen facilities to be disposed of at the farm Все органические пищевые отходы, производимые на кухнях должны утилизироваться на ферме c)Food waste daily removed from the kitchen Пищевые отходы должны ежедневно удаляться с кухни d)Food waste always contained in plastic containers for disposal Пищевые отходы должны всегда храниться в пластиковых ящиках для утилизации e) Non-food waste collected in separate containers as beverage cans, packing materials, etc. Непищевые отходы должны собираться в отдельные контейнеры, например, банки из-под напитков, упаковочные материалы и пр.	Catering Места общественного питания	Observation of catering Наблюдение	1)Contractor Подрядчик 2)Subcontractor Субподрядчик 3)Catering company Компания общественного питания	a) Yes b) Food waste is taken to farms for disposal c) Yes d) Yes **e) Separation of waste needs to improve (see comment to 8.5)**
	8.17	Oily wastewater Масло содержащие сточные воды	Oil and other lubricants collected in drums and disposed of in accordance with CONTRACTOR instructions Масло и прочие смазки должны собираться в металлические баки и утилизироваться в	Project Site Площадка проекта	Observation of oily waste water. Наблюден	1)Contractor Подрядчик 2)Subcon	**Inadequate – oily wastewater is not being disposed of properly and needs to be improved.**

			соответствии с инструкциями Подрядчика		ие	tractor Субподрядчик	**Conclusion of ecological expertise needs to be obtained .**